

December 12, 2025

VIA EMAIL

Gretchen Biernot
Current Planning Manager, Hanover County
7516 County Complex Road
Hanover, VA 23069
gwbiernot@hanovercounty.gov

Ms. Biernot,

Please accept this letter in response to the comment letter dated October 17, 2025 from Hanover County Planning Staff and related agencies, for the Hunting Hawk Technology Park (REZ2025-00020, CUP2025-00014, CPA2025-00003, and SE2025-00021) Below, please find the list of comments received and our applicable responses.

Planning Department

1. Comprehensive Plan Amendment: Note that the BOS must authorize advertisement of the requested CPA at a future meeting. Note that the boundaries of the area to be designated Employment Center are general in nature (not parcel specific) and may be prepared to follow natural or manmade boundaries where possible, such as roadways, transmission lines, waterways, etc.

Applicant's Response: Thank you for the comment, it has been noted. The Hanover County Board of Supervisors authorized advertisement of the requested CPA on 12/10/2025.

2. Residual Areas Zoned A-1 : Provide the acreage of the residual land that will remain zoned A - 1 . Verify that these parcels maintain legal access and meet all dimensional standards for the A-1 zoning district (minimum requirements regarding lot size, lot width, lot frontage, etc.).

Applicant's Response: The acreage for the residual remainder parcel that will remain zoned A-1 has been included on the updated zoning exhibit titled "Compiled Zoning Exhibit Showing Eleven Parcels Lying Along Ashland Road to be Rezoned as M-1" and dated June 5, 2025. Please see updated zoning exhibit.

3. Conceptual Plan Legend: Provide a legend with the conceptual plan. It is unclear what the dark green areas specify. It is unclear what the lighter tan areas note surrounding the conceptual building areas. Note what type of uses/activities are permitted in these areas.

Applicant's Response: The conceptual plan has been updated to better differentiate between colors and a legend has been included. Please see updated conceptual plan.

4. Ultimate Right-of-Way: Show the ultimate right-of-way along Ashland Road on the conceptual plan as specified in the Comprehensive Plan.

Applicant's Response: The conceptual plan has been updated to show the ultimate right-of-way along Ashland Road and Cauthorne Road. Right-of-way dedication is included in the submitted proffers. Please see updated conceptual plan and proffered conditions.

5. Proposed Entrances (Proffers and Conceptual Plan): For clarity, proposed entrances from Ashland Road should be numbered on the conceptual plan and cross-referenced in the proffers (Proffer #8 specifically). As the existing entrance to Hunting Hawk Golf Course has a left-turn lane, consider proffering that the left-turn lane remain at that entrance.

Applicant's Response: Site entrances have been labeled (1-3) on the updated conceptual plan. The proffered conditions have been updated to reflect the new site entrance numbers and to state that the existing turn lanes at site entrance 2 shall remain. Please see updated conceptual plan and proffered conditions.

6. Internal Roads: Please clarify whether internal roads will be public or private. Please provide a typical section. The construction plans submitted for a similar project (CON2025-00010: Hanover Technology Park Loop Road A) show wide utility easements on either side of the right-of-way creating a wider cross-section that involves additional tree clearing, particularly in buffer areas. Are additional utility easements planned for this project adjacent to and outside of the right-of-way road easements? Also note that Sec. 26-162.5 requires a landscape buffer 25 feet in width along internal roads within the M-1 zoning district.

Applicant's Response: The project will utilize private internal roads. Proffered conditions have been updated to reflect this. The applicant does not propose any buffers along private roads. Please see updated proffered conditions.

7. Construction Traffic Damage (Proffer #8.d): Specify what segment of Ashland Road will be evaluated and corrected due to construction damage (Example: Ashland Road between Pouncey Tract Road and the existing high-voltage transmission line).

Applicant's Response: Proffered conditions have been updated to specify that the segment of Ashland Road between Pouncey Tract Road and Cauthorne Road are subject to repairs from construction damage. Please see revised proffered conditions.

8. Perimeter Buffers (Proffers and Conceptual Plan)

- a. Inconsistency between Conceptual Plan and Proffers: The width of perimeter buffers is inconsistent between the conceptual plan and proffered conditions. The conceptual plan shows buffers that are generally 150 feet in width, with a buffer 200 feet in width along Ashland Road (and an area along the southern boundary that is only 100 feet in width). That does not align with the buffer widths described in Proffer #4.a.i, which only mentions buffers that are 100 to 150 feet in width.

Applicant's Response: Proffered conditions have been updated to better reflect the buffers shown on the conceptual layout. *Please see updated proffered conditions.*

- b. Minimum Recommended Width: Consider providing a minimum perimeter buffer width of 150 feet around the entire property as provided as part of REZ2023-00035 (Proffer #3), a comparable approved development for data centers, to help mitigate potential noise and visual impacts to nearby residential properties.

Applicant's Response: Thank you for the comment. Due to existing environmental conditions and parcel configuration, a 150' buffer is not feasible at all locations. The conceptual layout indicates all proposed buffer widths. *Please see revised conceptual layout.*

- c. Perimeter Buffers in Open Space: Language regarding the timing and installation of supplementary plantings within buffer areas located in common open space should be included within the proffers. It seems like some perimeter buffers are in open space areas that are not near building sites requiring site plan approval (such as areas separated from building sites by the primary access road), so there should be clarity on what party is responsible for the supplementary plantings and when those should occur.

Applicant's Response: The proffered conditions have been revised to require a phasing plan, which will show buffer plantings associated with each phase. *Please see revised proffered conditions.*

- d. Relationship to Ultimate Right-of- Way: The conceptual plan or proffers should clearly state that the perimeter buffer along Ashland Road is measured from the ultimate right-of-way specified in the Comprehensive Plan.

Applicant's Response: The proffered conditions have been updated to specify the measurement standards for widths of perimeter buffers. *Please see updated proffer conditions.*

- e. Substation at Northeast Corner: Consider additional buffering, setbacks, and other design techniques to minimize visibility of the proposed substation at the northeastern corner of the property from Ashland Road, as the adjacent transmission line and curvature in the road may allow visibility of that feature. Ashland Road is a locally-designated scenic road on the Comprehensive Plan, so minimizing visibility of the project from the roadway is highly encouraged.

Applicant's Response: The proffered conditions have been updated to state that any substation adjacent to an existing easement for transmission lines must be setback at least 100' feet from the easement boundary. This has been reflected in the updated conceptual plan. This measure will mitigate visual impacts. Due to Dominion clearing standards adjacent to transmission lines, a fully planted buffer cannot be provided adjacent to the substation. Please see updated proffered conditions and conceptual plan.

- 9. Open Space and Property Owners Association: Consider proffering that there will be a property owners' association that will be responsible for the maintenance of open space areas and ensure consistent design within the development should there be multiple property owners (Comprehensive Plan: p. 48). Any proffer regarding establishment of the Property Owners Association should specify when the association will be formed (e.g. prior to construction plan approval, prior to subdivision approval, prior to approval of the first site plan, etc.). As part of REZ2023-00006 (Proffer #14), formation of a property owners' association is required prior to or concurrent with final approval of the initial subdivision of the property. Within the Employment Center land use designation, the Comprehensive Plan (p. 47) recommends at least 10% of the project area be dedicated as open space.

Applicant's Response: Proffered condition 15 has been added to address instances where the property is not held in sole common ownership, to include the potential creation of a property owners association. Please see updated proffered conditions.

- 10. Screening of Mechanical Equipment (Proffer #12): This proffer specifies that mechanical equipment will only be screened from "adjacent public streets and residential dwellings located in Hanover County." This proffer should be revised to require screening of mechanical equipment from View of any residential property, regardless of the locality, to mitigate potential visual and noise impacts.

Applicant's Response: Proffered condition 5 now states that mechanical equipment that is visible from public rights-of-ways and/or adjacent residential dwellings must be screened. Please see updated proffered conditions.

- 11. Fencing (Proffers, Conceptual Plan, and Special Exception Request)

- a. There are inconsistencies regarding the proposed fencing height. Sheet C4.0 (Note #2) of the conceptual plan/sketch plan states that fencing will be 7 — 10 feet tall, while Proffer #6 states that fencing will be 6 - 10 feet tall.

Applicant's Response: All documents have been revised to reflect a special exception request for fencing of 7 – 10 feet in height. *Please see updated proffered conditions and special exception application.*

- b. The application submitted with SE2025-0002 does not specifically state that fences up to 10 feet tall are being requested, but that information is included in the sketch plan. Please ensure consistency between the conceptual plan, sketch plan, and proffered conditions and amend the application for SE2025-00021 to specifically state the maximum fence height requested.

Applicant's Response: All documents have been revised to reflect a special exception request for fencing of 7 – 10 feet in height. *Please see updated proffered conditions and special exception application.*

- c. The conceptual plan seems to show the fence crossing creeks and Resource Protection Areas (RPAs) (Example: Tributary at south-central portion of site west of a conceptual substation and well). Consider removing the fence from these areas, so that waterways and riparian corridors remain natural and serve as wildlife corridors (Comprehensive Plan Strategy EN.3d (p. 155 — 156).

Applicant's Response: The conceptual layout has been revised to show new security fencing layout which better respects environmental features while continuing to provide site security. *Please see updated conceptual layout.*

12. Building Height (SE2025-00021): Please specifically state the maximum building height requested on the application for SE2025-00021. It is shown on the sketch plan but not specifically stated on the application. Consider preparing line-of-sight renderings to provide a better understanding of potential visual impacts of buildings that exceed maximum height requirements, based upon topography and vegetation.

Applicant's Response: The special exception application has been revised to specify a maximum building height of 62'. Visual impact renderings have been prepared and made available for reference and will be made available in the FAQ document submitted with the hard copy physical resubmission. *Please see revised special exception application and visual renderings.*

13. Building Elevations: Please provide building elevations that align with the proffered conditions. If building elevations are conceptual in nature, please identify key elements that align with proffered conditions and recommendations in the Comprehensive Plan (examples below).

Applicant's Response: Conceptual building elevations have been provided with the revised application plan set and zoning exhibits. Please see submitted conceptual elevations.

14. CUP and SE Conditions: Note the Hanover County may impose any reasonable conditions the Board of Supervisors deems necessary to mitigate potential impacts of any uses requested with the CUP and SE applications. While the application included suggested conditions, the Planning Department will develop recommended conditions to mitigate potential impacts identified during the review process. Those conditions will be included in the staff report and may differ from the suggested conditions included in the application.

Applicant's Response: Thank you for the comment. Recommended conditions have been included to assist County staff and Board members with their decision making process and are meant only as aids in this process. Revised recommended CUP and SE conditions have been included in the application resubmission. Please see recommended CUP and SE conditions.

15. Wastewater Utility Pumping Station and Treatment Plant: To help the Planning Department identify potential impacts, please provide additional information regarding the capacity of the conceptual well, hydro tank, and wastewater utility pumping station and treatment plan. Due to the project's location on the edge of the Suburban Service Area (with the Opposite side of Ashland Road being outside of the Suburban Service Area), nearby residents have expressed concerns regarding potential impacts to groundwater. Please provide information or studies on how the proposed private well and wastewater systems may impact (or may not impact) groundwater and nearby wells. If there is an impact, please identify mitigation measures. Please provide elevations of the hydro tanks and indicate their maximum height.

Applicant's Response: The wastewater treatment plant has been removed from this case. Resubmitted documents reflect a proposal utilizing private drainfields that are not anticipated to have any impacts to adjacent wells or septic systems. The remaining pump stations are solely for the purpose of pumping wastewater to the drainfields and are located primarily below grade. Proffered condition 13 states that no public or private potable water will be utilized for cooling of the industrial equipment. Please see updated applications, conceptual layout, and proffered conditions.

16. Community Meeting: Please organize a community meeting for these zoning requests (organized by the applicant in coordination with the Planning Department). 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 and public feedback received. I have attached community meeting guidelines for reference.

Applicant's Response: A community meeting for the project was held on November 17, 2025. Notifications were sent to adjacent landowners and landowners adjacent to adjacent landowners.

17. Response Letter Requested: Please submit a response sheet to this comment letter.

Applicant's Response: Applicant thanks County staff for their thorough review of the application documents and their comments.

18. Review Meeting: Please contact me to schedule a meeting to review the contents of this letter prior to resubmittal.

Applicant's Response: Applicant met with County staff via video conference prior to resubmission.

19. Resubmittal Deadline for Planning Commission Meeting (Tentative Date: January 15, 2026): Please email me a PDF of the revised sketch plan and proffers before submitting hard copies. Electronic copies will be due by December 12, 2025, but hard copies will be due January 5, 2026 [Sec. 26-307(c)].

Note that the Planning Commission public hearing will not be advertised until a community meeting is held and VDOT approves the Traffic Impact Analysis. VDOT presented significant issues with the Traffic impact Analysis and transportation network in its comment letter, so please ensure these issues are addressed prior to resubmittal. Note that Hanover County has also sent the Traffic Impact Analysis to a third-party consultant for review and will be forwarding their comments in early November.

Applicant's Response: Comment is noted.

Virginia Department of Transportation

1. Please provide the trip generation information (both of full buildout traffic and construction) in the Appendix.

Applicant's Response: Trip generation information for the full buildout and construction has been included in the Appendix of the revised TIA. *Please see revised TIA.*

2. Please include an access management section discussing if the proposed site entrances will meet VDOT's spacing requirements.

Applicant's Response: Access management has been included in the revised TIA. *Please see revised TIA.*

3. The EB and WB through volumes at the site entrances in Figure 7-2 are incorrect.

Applicant's Response: Figure 7-2 has been revised to accurately reflect EB and WB through volumes. *Please see Figure 7-2 of the revised TIA.*

4. Figure 7-1 shows construction traffic distributed at 25% at Site Entrance 1, 50% at Site Entrance 2, and 25% at Site Entrance 3. It is likely that the construction traffic will be more concentrated at one or two of the entrances changing during different phases of the construction depending on where the building activities actual occur.

Applicant's Response: Per conversation with Hanover County, construction trip distribution has been limited to Site Entrance 2.

5. With the construction traffic distributions as shown in Figure 7-1, the AM construction volumes would warrant right turn lanes at Site Entrances 1 and 2.

Applicant's Response: The turn lane warrant analysis has been revised. *Please see revised TIA.*

6. Signal timing adjustments are recommended at the intersection of Ashland Road at Pouncey Tract Road. Please clarify if the MOEs reported are with or without these signal timing adjustments.

Applicant's Response: Clarification has been provided in the text of the TIA that signal timing splits were optimized for future scenarios. *Please see revised TIA.*

7. The capacity analysis shows the following:

- Under 2035 conditions, site traffic causes the SBL queue to exceed the available storage at the Ashland Road Pouncey Tract signal in the AM peak hour. Additionally, site traffic causes a significant increase in EB and WB queuing, as well as increasing overall delay by over 100 seconds over 2035 background conditions.

Applicant's Response: Additional clarification has been provided in the text of the revised TIA. *Please see revised TIA.*

- Construction traffic causes an increase in overall intersection delay above existing conditions of nearly 90 seconds and 40 seconds in the 2027 AM and PM peaks, respectively, as well as significant increase in EB queuing during the 2027 AM peak. And WB queuing during the 2027 PM peak. These degradations need to be specifically called out in the report with discussions on whether or not mitigations are recommended.

Applicant's Response: Additional clarification has been provided in the text of the revised TIA. *Please see revised TIA.*

8. It is the responsibility of the engineer who signs and seals the plans to verify that the intersection and stopping distances at the proposed entrance locations have been checked.

Applicant's Response: Comment is noted. Plans will be submitted in accordance with VDOT regulations.

Department of Public Utilities

1. This development is within the Suburban Service Area (SSA) but public water and sanitary sewer are not immediately available for this development and will require both extensive, off-site extensions and off-site Water and Sanitary Sewer Easements to provide public service.

Applicant's Response: Thank you for the comment. The project will not utilize public water or wastewater services, as reflected in the proffered conditions.

2. If required, any improvements, extensions or new connections to the public water or sanitary sewer systems will need to be completed in accordance with DPU requirements. If public water and sanitary sewer are required, additional comments will be generated.

Applicant's Response: Thank you for the comment. The project will not utilize public water or wastewater services, as reflected in the proffered conditions.

3. The developer is responsible for all approvals required for their proposed private wells, water storage tanks, water pump stations and wastewater treatment plant.

Applicant's Response: Comment is noted. Applicant will pursue required approvals in accordance with DPU regulations.

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

Applicant's Response: Comment is noted. Required costs and fees will be paid as applicable.

5. This development represents approximately 400+ acres at the western limits of the SSA. This area is not currently served by public water and sanitary sewer. A development of this scale in this area could impact DPU's Utility Master Plan including the need for future public water storage tanks with pump stations and wastewater pump stations. This development's continued inclusion or removal from the SSA should be considered and evaluated to allow DPU to adjust planning for future support facilities/improvements accurately.

Applicant's Response: Thank you for the comment. The project will not utilize public water or wastewater services, as reflected in the proffered conditions.

Office of the Fire Marshal

1. 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)

Applicant's Response: Thank you for the comment. Fire hydrant counts and locations will be finalized at the time of site and construction plans review.

2. Fire hydrants must be located within 400 feet (600 feet if Sprinklered) of all parts of the building: VSFPC - 507.5.1 (2021)

Applicant's Response: Thank you for the comment. Fire hydrant counts and locations will be finalized at the time of site and construction plans review.

3. 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)

Applicant's Response: Thank you for your comment. This information will be provided at the time of site and construction plans review.

4. 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.

Applicant's Response: Thank you for your comment. Access roads shall be constructed to reflect these requirements and finalized at the time of site and construction plans review.

5. Where a fire hydrant is located on a fire apparatus access road, the minimum road width shall be 26 feet. VSFPC - D103.1 (2012)

Applicant's Response: Thank you for your comment. Access roads shall be constructed to reflect these requirements and finalized at the time of site and construction plans review.

6. The approximate location of all required fire lane markings shall be indicated on the plans. Fire lanes between twenty and twenty-six feet in width shall be marked on both sides of the roadway. The required forms and installation instructions for the fire lane details can be obtained from Hanover Fire and EMS Office of the Fire Marshal website.
<https://www.hanovercounty.gov/1082/Plans-Review>

Applicant's Response: Thank you for your comment. Fire lanes will be finalized at the time of site and construction plans review.

7. An approved lock shall be installed on buildings, gates, or similar barriers where required by the fire code official. VSFPC - 505.1.1 (2021)

Applicant's Response: Thank you for your comment. This will be provided and finalized at the time of site and construction plans review.

8. 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)

Applicant's Response: Thank you for your comment. This will be provided and finalized at the time of site and construction plans review.

9. 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)

Applicant's Response: Thank you for your comment. This will be provided and finalized at the time of site and construction plans review.

10. 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)

Applicant's Response: Thank you for your comment. This will be provided and finalized at the time of site and construction plans review.

11. 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)

Applicant's Response: Thank you for your comment. This will be provided and finalized at the time of site and construction plans review.

12. Parking stalls or other obstructions shall not be placed in front of the access to fire hydrants, fire pump test headers, fire department sprinkler system connections, fire department standpipe connections, or fire protection system control valves. VSFPC -507.5.4/507.5.5 (2021)

Applicant's Response: Thank you for your comment. This will be provided and finalized at the time of site and construction plans review.

13. 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>

Applicant's Response: Thank you for your comment. Applicant will adhere to all requirements of the Hanover Fire Marshal's Office.

Department of Public Works

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

Applicant's Response: Wetland delineation & CBPA/RPA evaluation have been completed. WQIA certification will be provided at the time of construction plan review.

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

Applicant's Response: Comment is noted, thank you.

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

Applicant's Response: Stormwater detention ponds are included in the conceptual layout and will be provided per DPW regulations. Please see the updated conceptual layout.

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

Applicant's Response: Applicant will ensure DPW requirements are met.

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

Applicant's Response: Applicant will comply with an energy balance and 10/10 pre/post detention.

6. There does not appear to be a clear outfall from the site to a manmade or natural stormwater conveyance. Easement on adjacent sites may be required.

Applicant's Response: Applicant will ensure compliance with applicable DPW regulations.

7. NWI wetlands are prevalent on the site. Site specific evaluation/determination of the extent of wetlands will be required.

Applicant's Response: Onsite wetlands were delineated and confirmed by the USACOE in 2025. Documentation will be provided to Hanover County at the time of construction plans review.

8. Tiller dam located onsite is regulated by DCR. Inundation mapping will be needed to show areas to avoid development.

Applicant's Response: Comment is noted. Site will be developed with respect to the existing inundation limitations and provided at the time of site and construction plans review.

9. Onsite ponds must meet the requirements of the Hanover County Drainage Design Handbook. Tiller dam must be current with state permitting.

Applicant's Response: Thank you for your comment. Applicant will ensure compliance with all DPW and state requirements.

10. Offsite ponds must not be impacted by development. See Hanover County Drainage Design Handbook.

Applicant's Response: Thank you for your comment. Applicant will ensure compliance with all DPW and state requirements.

Sincerely,

A handwritten signature in blue ink, appearing to read "M.G. Roberts", with a stylized flourish at the end.

Matthew G. Roberts