



# Friends of the Rappahannock

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## Position Statement: Data Centers

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Friends of the Rappahannock (FOR) acknowledges that data centers are integral to modern life, supporting essential digital infrastructure. We all benefit from the services provided that are supported by data centers. We recognize the need for these facilities. But just like any development project, there is a right place and a wrong place, a better and worse option; especially when it comes to sensitive areas and resources like streams, wetlands, forests, wildlife habitat, historic and cultural resources, and our communities.

Like other large development projects, the construction of data center buildings have impacts and are subject to erosion and sediment control, stormwater management, CBPA, wetland protection, and other regulations. However, these projects also require a significant increase in the development of support infrastructure. Some of this infrastructure includes water collection, distribution and discharging (for cooling), and energy transmission. The demand for energy to power data centers requires significant increases in energy generation demand. This demand has additional environmental impacts to our land, water, and air. Data center projects and their subsequent support projects must be carefully managed to minimize environmental impact.

### Siting Considerations

1. Converting prime agricultural land, wetlands, forests, and floodplains, especially adjacent to major rivers or wetland areas, to industrial scale facilities is not in the public interest and presents a risk to water resources and downstream landowners.
2. Proximity to residential areas, especially marginalized communities, should be a consideration.
3. Impacts to the water supply of all beneficial users needs to be fully evaluated, shared publicly and addressed.
4. Transmission infrastructure siting needs to consider all of the above.

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### Construction Considerations

1. Robust erosion and sediment control and onsite stormwater management to prevent damages to water resources are essential practices. Green infrastructure practices should be incorporated in designs to the maximum extent practicable. These practices need to be designed to handle full containment of a 50 year storm.
2. Buffers for setbacks from property lines, roads and sensitive sites features such as waterways, wetlands, steep slopes, and cultural/historical heritage sites should be included.
3. Mature tree canopy should be maintained as much as possible and used as screening as existing site conditions allow.

### Energy Resource Considerations

Virginia has committed to transitioning to 100% carbon-free electricity generation by 2050. Data centers require an enormous amount of electricity. At the same time that Virginia is trying to reach our clean energy goals, our energy production will need to increase significantly in order to provide this power. While FOR supports this clean energy goal, we have the same concerns for siting and constructing large scale renewable energy sites as stated above. These projects, when done incorrectly, pose a serious risk to our water resources. Therefore, we cannot ignore the energy issue that is posed by data centers in our watershed.

### Transparency in Process Considerations

Water in Virginia is a public trust resource. There needs to be transparency in how much and in what way our water resources will be used. It is in the public's best interest to have this information. Data center companies and local governments must be open and truthful during the planning and permitting processes for data center and associated supportive infrastructure projects.

Friends of the Rappahannock (FOR) maintains a balanced and pragmatic approach toward the potential development of data centers. FOR believes in engaging constructively with all stakeholders, including corporations and government entities, and our focus is on ensuring that any development is carried out responsibly and sustainably. **The best way to engage with FOR is proactively at the beginning of a proposed project.** We are available to review and make recommendations on site considerations and plans to ensure our water resources are protected.

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