



LOUDOUN COUNTY DATA CENTER INTELLIGENCE HISTORY

2015-2025

A chronological political and policy intelligence review of Loudoun County Board of Supervisors records

Source corpus	881-page merged Loudoun County action-report corpus
Coverage	2015-2025
Search universe	224 exact data-center phrase occurrences across 119 PDF pages
Method	Primary-record chronology, cross-record pattern analysis, and investigative lead identification

Prepared from the uploaded Master Loudoun Data Center Corpus. Findings below are source-derived unless explicitly labeled analytical inference. Page references are to the 881-page master corpus PDF.

Executive Intelligence Summary

1. **The policy arc is unmistakable: Loudoun moved from facilitating and economically optimizing data-center growth toward progressively tighter land-use, design, residential-compatibility, environmental, and infrastructure controls.** The shift begins visibly with the 2015 effort to require a special exception in the CLI district, becomes formalized in the 2019 Comprehensive Plan, accelerates after the 2022 Data Center Land Study, and culminates in the 2024-2025 countywide Standards and Locations process.
2. **2015-2019 was the first regulatory recalibration.** In July 2015, Supervisor Matt Letourneau successfully initiated removal of data centers as a by-right CLI use, while the Board simultaneously defended the state sales-tax exemption and analyzed local computer-equipment tax policy. By 2019, data centers were retained as a conditional rather than core use in Suburban Employment, paired with a direction to develop compatibility standards.
3. **Revenue dependence and land-use concern developed in parallel.** Records show repeated Board attention to data-center tax revenue and tax treatment while simultaneously increasing scrutiny of noise, land-use compatibility, and the geographic footprint of by-right development.
4. **Power infrastructure became a core land-use issue, not a side issue.** By 2021 the Board was directly involved in routing Dominion transmission infrastructure to serve multiple Route 28 data-center campuses; by 2024-2025 it was exploring cost assignment for underground transmission, adding utility-infrastructure details to land-use staff reports, and studying separation distances for substations.
5. **2022 is the clearest turning point.** The Data Center Land Study triggered a countywide reassessment of where data centers should be by-right, including Route 7, Route 28, Suburban Mixed Use areas, and the proposed Dulles Cloud South concept. Later that year, the Board directed Comprehensive Plan and Zoning Ordinance changes to constrain locations and add design, residential-proximity, and sustainability standards.
6. **The 2023 Zoning Ordinance Rewrite converted policy concerns into detailed operating standards.** The Board debated and adopted measures dealing with facades, screening, sound barriers, generator testing, setbacks, residential adjacency, and where data centers should require special exceptions.
7. **The 2024-2025 process moved from piecemeal standards to a countywide locational regime.** Phase 1 and Phase 2 addressed grandfathering, 500-foot residential standards, conditional/core-use status, Transition Policy Area encroachment, transit-oriented redevelopment, and substation separation.
8. **Supervisor positions are not reducible to simple pro- or anti-data-center labels.** The record shows shifting coalitions depending on issue: growth and economic policy, property rights/grandfathering, residential buffers, design controls, environmental requirements, and infrastructure costs each produced different voting alignments.
9. **The most promising investigative questions concern consistency, not presumed misconduct.** Useful follow-up targets include comparing campaign-finance sectors to specific land-use votes; tracking developers that recur across zoning, generator, and transmission matters; testing whether officials' public messaging matched their recorded votes; and quantifying the fiscal tradeoff between tax revenue and infrastructure/mitigation costs.

10. **The corpus reveals an institutional evolution from “Data Center Alley” as an economic asset to data centers as a comprehensive planning constraint.** By late 2025, Board policy explicitly sought to preserve transit-oriented development, prevent encroachment into sensitive place types, and integrate large-load electrical infrastructure into the land-use review process.

Bottom Line

Loudoun did not simply “turn against” data centers. The record shows a decade-long transition from permissive industrial siting plus revenue optimization to a mature regulatory regime focused on location, compatibility, power delivery, environmental impacts, and protection of residential/transit-oriented land. The political story is the tension between preserving the tax base and existing investments while restricting where and how the next generation of facilities can be built.

Methodology and Evidentiary Rules

- This report is based only on the uploaded 881-page Master Loudoun Data Center Corpus 2015-2025, a merged set of Loudoun County action reports selected because they contained “data center.”
- The corpus contains 224 exact phrase occurrences across 119 PDF pages. Incidental mentions were filtered from the principal chronology; representative administrative air-permit certifications are discussed as evidence of industry expansion rather than treated as policy turning points.
- Votes, dates, motions, names, and project references are presented as documented in the corpus. Analytical conclusions are labeled as interpretation or investigative lead when they go beyond the face of the record.
- Chronology is based on meeting dates contained in the action reports. Master PDF page numbers are supplied so findings can be traced back to the merged corpus.

Chronological Intelligence Timeline

Date	Milestone	Documented action	Source
2015-01-07	Industry institutionalization	James Leach appointed as the Economic Development Advisory Commission data-center representative.	Master p. 8
2015-07-01	CLI special-exception initiative	Letourneau moved to remove data centers as a permitted CLI use and require a Special Exception; passed 6-3. Clarke’s broader all-district special-exception amendment was not accepted.	Master p. 44
2015-09-16	Tax policy enters agenda	Letourneau requested information on the sunset of the state data-center sales-tax exemption.	Master p. 68
2015 (later)	Sales-tax exemption defense	Board backed extending or eliminating the 2020 sunset of the data-center sales-tax exemption; passed 9-0.	Master p. 88

2016-04-05	Formal zoning amendment initiated	Board adopted the Resolution of Intent for ZOAM-2016-0002, Data Center in CLI; passed 9-0.	Master p. 104
2016-09-14	CLI zoning change adopted	Board approved ZOAM-2016-0002 governing data centers in the Commercial Light Industry district; passed 9-0.	Master pp. 124-125
2016-10-20	Local tax-base analysis	Letourneau directed analysis of computer-equipment personal-property tax rates in relation to Loudoun's data-center market.	Master p. 134
2016-11-01	Noise mitigation policy	Board directed additional research on funding incentives for data-center noise attenuation; motion passed 6-2-1.	Master p. 143
2017-05-10	Fiscal comparison	Board requested long-range net fiscal-impact comparisons between data-center and mixed-use development on a hypothetical 20-acre site.	Master p. 178
2018-11-07	Energy efficiency	Chair Randall reported attending a data-center energy-policy discussion focused on efficiency.	Master p. 252
2019-01-02	Revenue growth scrutiny	Supervisor Meyer requested a chart showing growth in data-center revenue.	Master p. 280
2019-06-15	Comprehensive Plan pivot	Board retained data centers as a Conditional Use in Suburban Employment and directed future performance standards for design, landscaping, and compatibility; substitute motion passed 8-0-1.	Master pp. 295-296
2019-12-17	Economic branding	Board directed a branding review of Loudoun's data-center cluster and possible signage campaign.	Master p. 331
2021-07-14	Undergrounding enters project review	Letourneau requested a proffer commitment to underground power lines if a site developed as a data center.	Master p. 385
2021-07-20	Transmission routing	Board authorized steps to promote a less-intrusive Dominion high-voltage transmission route serving multiple Route 28 data-	Master p. 397

		center campuses; passed 8-0-1.	
2021-10-19	Energy strategy expansion	Supervisors requested research on waste-heat reuse, efficiency certification, data-center energy share, and County influence over energy supply.	Master pp. 403-404
2022-04-05	Data Center Land Study turning point	Board sent the Land Study back for broader discussion of targeted policy/regulatory revisions, focusing on Route 7, Route 28, Suburban Mixed Use, and by-right parcels; main motion passed 7-2.	Master pp. 476-477
2022-09-20	Countywide policy redesign	Data Center Discussion Series advanced Comprehensive Plan and Zoning Ordinance changes to constrain locations and add design, residential-proximity, and environmental standards.	Master pp. 523-525
2023-06-20	Dedicated locations CPAM	Board funded a separate data-center locations Comprehensive Plan Amendment to update Place Type maps and establish appropriate locations; passed 5-4.	Master p. 631
2023-09 to 10	Detailed operating standards	Zoning rewrite work sessions addressed facades, screening, acoustical barriers, generator testing, setbacks, residential adjacency, and special-exception status in multiple districts.	Master pp. 650-699
2023-11-09	Sequencing decision	Board deferred the Data Center Locations CPAM until completion of the Zoning Ordinance Rewrite and directed a joint design-standards/locations CPAM-ZOAM process afterward; passed 5-1-2-1.	Master p. 731
2024-09-17	Infrastructure cost allocation	Letourneau directed staff to develop a strategy for assigning underground transmission-line costs to data-center customers, including possible taxes/service districts.	Master p. 770
2025-02-12	Phase 1 public hearing	Board advanced Data Center Standards and	Master pp. 787-788

		Locations Phase 1 and began explicit grandfathering decisions; initial forwarding motion passed 6-2-1.	
2025-03-18	Phase 1 adopted	Board adopted Phase 1 after extensive grandfathering debate; main motion passed 7-2. The record also defined substantial modifications involving height, setbacks, uses, and land area.	Master pp. 803-806
2025-04-15	Phase 2 reset	Board sent Phase 2 scope to TLUC for re-evaluation; the motion was amended to clarify the March 18 intent to require a Special Exception for all data-center applications permanently; passed 9-0.	Master pp. 824-825
2025-07-15	Power infrastructure becomes standard land-use evidence	Board required high-voltage transmission-line and substation narrative/mapping in staff reports for industrial and data-center land-use applications; passed 8-0-1.	Master p. 838
2025-09-16	Transition-area protection	Phase 2 project plan advanced with policy direction that data centers should not encroach into Transition Policy Area locations outside designated industrial place types; passed 8-1.	Master p. 846
2025-10-21	Transit and substation separation	Board directed policy to preserve future transit-oriented development near Loudoun Gateway while accommodating existing data centers, and called for a substantial substation-to-residential separation distance such as 500 feet.	Master p. 862
2025-12-02	Large-load power planning	Board considered HVDC, renewable integration, and infrastructure delivery directly to “Data Center Alley,” showing power-system planning had become inseparable from data-center policy.	Master pp. 878-879

I. 2015-2016: From By-Right Growth to First Regulatory Controls

First visible constraint on by-right development

The July 1, 2015 Board Member Initiative is the earliest major policy inflection in the corpus. Letourneau sought to require a Special Exception for data centers in the Commercial Light Industry district rather than allow them as a permitted use. The motion passed 6-3, while Clarke's proposed expansion of the requirement to all zoning districts was not accepted. This is evidence that the Board was already distinguishing between support for the industry and support for unrestricted siting. (Master p. 44)

Economic incentive policy remained strongly supportive

At the same time, the Board treated data centers as an economic asset. Records show interest in extending or eliminating the state sales-tax exemption sunset and analyzing local computer-equipment tax rates to protect or optimize Loudoun's market position. The sales-tax position passed 9-0. (Master pp. 68, 88, 134)

Noise emerged early as a policy cost

By November 2016 the Board was researching ways to fund incentives for noise attenuation, signaling that community-impact mitigation had become a recurring cost of the industry's expansion. (Master p. 143)

II. 2017-2019: Fiscal Value Versus Land-Use Compatibility

The fiscal case was explicit

In 2017 the Board requested a 2040 net-fiscal-impact comparison between data-center and mixed-use development on a hypothetical 20-acre site. In January 2019 Meyer requested a chart detailing data-center revenue growth. These requests show that land-use decisions were being evaluated against the industry's fiscal contribution. (Master pp. 178, 280)

Administrative approvals reveal rapid physical expansion

The corpus repeatedly records DEQ-related local certifications for RagingWire, Digital Realty, QTS, Wheeler, Compass, Hayden Technologies, Sentinel, Vantage, CyrusOne, Aligned Energy, and others from 2017 onward. These items are often administrative rather than discretionary policy decisions, but collectively they document the scale and pace of facility expansion.

2019 Comprehensive Plan changed the policy vocabulary

During the June 15, 2019 work session the Board retained data centers as a Conditional Use in the Suburban Employment Place Type and directed the future zoning overhaul to develop design, landscaping, and compatibility standards. This is a shift from regulating individual districts toward embedding data-center compatibility into the County's long-range planning framework. (Master pp. 295-296)

Economic promotion remained active

Later in 2019 the Board directed a branding review of the Loudoun data-center cluster, illustrating that tighter land-use controls coexisted with active promotion of “Data Center Alley.” (Master p. 331)

III. 2020-2021: Power, Environment, and Infrastructure Move to Center Stage

Transmission infrastructure became a Board-level policy problem

By July 2021 the Board was taking direct action on the routing of high-voltage Dominion transmission lines needed to serve multiple Route 28 data-center campuses. Letourneau also sought undergrounding commitments in project proffers. (Master pp. 385, 397)

Energy policy broadened beyond electricity supply

In the 2021 Energy Strategy discussion, supervisors requested research on waste-heat reuse, LEED/Energy Star-style certification, the industry’s share of County energy use, and ways the County could influence data-center efficiency and energy supply. This marks a clear transition from “how much power is needed” to “what energy consequences should be regulated or mitigated.” (Master pp. 403-404)

IV. 2022: The Countywide Reassessment

The Land Study reframed data centers as a countywide land-use challenge

The April 2022 Data Center Land Study directed attention to Route 7, Route 28, Suburban Mixed Use areas, and parcels where data centers remained by-right under the 1993 zoning ordinance. The Board explicitly linked acreage analysis to future fiscal-impact and zoning decisions. (Master pp. 476-477)

The September 2022 Discussion Series converted study into policy instructions

The Board directed Comprehensive Plan changes for place types where data centers were not envisioned, considered the status of the Urban Employment/Urban Transit Center areas, and directed zoning standards for design quality, residential proximity, and environmental sustainability. The vote splits around industry flexibility and Dulles Cloud South show competing priorities over existing investment expectations versus future constraints. (Master pp. 523-525)

V. 2023: Standards Become Detailed and Operational

Location planning became a funded work program

In June 2023 the Board approved a separate data-center locations CPAM and \$90,000 in funding to update Place Type maps and establish appropriate locations. The 5-4 vote demonstrates that the scope and urgency of the policy intervention remained politically contested. (Master p. 631)

The Zoning Ordinance Rewrite became highly granular

Work sessions in September and October addressed mechanical-equipment screening, facade treatment, setbacks, building massing, residential adjacency, acoustical barriers, generator testing, and whether data centers should remain permitted or become Special Exception uses in multiple districts. (Master pp. 650-699)

Residential compatibility became a central regulatory principle

A 9-0 motion required acoustical barriers around exterior mechanical equipment when data centers are adjacent to residential uses. Other motions tested generator-testing restrictions and adjacency rules. This is evidence that nuisance mitigation had moved from project-specific negotiation to standardized countywide regulation. (Master pp. 667-672)

VI. 2024-2025: Countywide Locational Control and Infrastructure Accountability

Phase 1 and Phase 2 institutionalized a new regime

The 2024-2025 Standards and Locations process addressed which applications would be grandfathered, how far facilities should be from residential uses, when modifications trigger new approvals, and where data centers should be core, conditional, or special-exception uses. (Master pp. 787-825)

Infrastructure costs increasingly shifted toward the industry

In September 2024 Letourneau directed staff to explore assigning underground transmission-line costs to data-center customers using mechanisms including personal-property tax, special tax districts, and service districts. In July 2025 TeKrony required high-voltage transmission and substation information in land-use staff reports. (Master pp. 770, 838)

Planning policy began protecting future non-data-center land uses

Phase 2 direction in late 2025 sought to prevent encroachment into most of the Transition Policy Area, preserve transit-oriented development near Loudoun Gateway, and create substantial substation separation from existing residences. (Master pp. 846, 862)

Large-load power planning is now part of land-use strategy

The December 2025 discussion of HVDC infrastructure, renewables, battery storage, and direct service to “Data Center Alley” shows that the County’s data-center policy has expanded beyond zoning to the architecture of the regional electric system. (Master pp. 878-879)

Political Actor Analysis - Key Supervisors

Actor	Documented pattern	Analytical reading
Matt Letourneau	Early and recurring actor on zoning controls and economic/infrastructure policy. Initiated the 2015 CLI special-exception requirement; later sought tax analysis, undergrounding	The record reflects both industry-economic concern and increasingly explicit cost/compatibility controls; not a simple pro/anti profile.

	commitments, and a strategy for assigning underground transmission costs to data-center customers.	
Phyllis Randall	As Chair, appears repeatedly in energy-efficiency, Comprehensive Plan, grandfathering, and transmission matters. In 2019 she moved the substitute motion retaining data centers as Conditional Uses in Suburban Employment.	Often positioned at the institutional center of policy consolidation and compromise.
Mike Turner	Major driver of the 2022 Data Center Land Study follow-up and Discussion Series, as well as later land-use/location revisions.	Strongly associated in the corpus with moving from study to countywide regulatory redesign.
Juli Briskman	Frequent advocate for tighter location/use controls and residential/environmental standards; sponsored the 2023 dedicated locations CPAM and multiple 2023 zoning-rewrite restrictions.	Often appears on the restrictive/regulatory side of close votes.
Kristen Umstattd	Frequently offered amendments emphasizing flexibility, alternative land designations, or different grandfathering outcomes, while also pursuing specific generator/residential standards.	The record shows a mixed posture: skeptical of some countywide restrictions but active on certain operational safeguards.
Sylvia Glass	Recurring role in project-level scrutiny, maps, architecture, transmission routing, and data-center land-use decisions.	Often emphasizes project impacts and infrastructure evidence.
Caleb Kershner	Recurring advocate for preserving flexibility and existing development expectations during the countywide regulatory shift. In the September 2022 Discussion Series he sought industry-stakeholder language allowing existing data-center properties flexibility to request zoning modifications; the amendment failed 3-5-1. He and Umstattd opposed the July 2024 Phase 1 project plan, and in March 2025 he repeatedly sought a later grandfathering cutoff while also winning a 9-0 technical amendment to the grandfathering resolution.	The record places Kershner consistently on the property-rights / existing-investment side of several close data-center votes, especially on flexibility and grandfathering. That does not equal blanket opposition to standards: he participated in the final framework and secured amendments, but generally resisted provisions he viewed as narrowing previously available development rights.
Laura TeKrony	Prominent in 2025 Phase 1/2 debates, permanent Special Exception intent, utility-infrastructure disclosure, transit-oriented development, and substation separation.	Represents the later-stage shift toward integrating power infrastructure into planning review.
Koran Saines	Appears as seconder/supporter on multiple residential-compatibility, design, and Phase 1 actions, including acoustical barriers and Phase 1 adoption.	Frequently aligned with tighter compatibility standards in the 2023-2025 period.

Actor summaries are descriptive of actions in this corpus, not comprehensive political profiles. They should be cross-checked against full voting records, public statements, campaign finance, and meeting video before being used as claims of ideological consistency or inconsistency.

Corporate and Infrastructure Actor Analysis

- **RagingWire / NTT:** Multiple DEQ-related local certifications and facilities in Ashburn; illustrates early growth of large-campus operators.
- **Digital Realty / Digital Loudoun:** Repeated facility and permit references; part of the established Ashburn cluster.
- **CyrusOne:** Expansion/FAR and air-permit activity across the period.
- **Microsoft:** Multiple data-center and generator certifications, including Compass Creek/Blue Ridge locations.
- **Vantage Data Centers:** Repeated certifications and 2023 land-use application activity, including Vantage VA2 and Broad Run.
- **Aligned Energy / Aligned Data Centers:** 2019 facilities, 2022 generator approvals, and 2023 land-use application; a recurring actor across operational and legislative records.
- **Amazon Data Services:** Large generator counts appear in 2023 administrative certifications, illustrating the scale of backup-generation infrastructure.
- **Dominion Energy:** Not a data-center operator, but a central infrastructure actor as transmission routing and undergrounding became inseparable from data-center land-use policy.

Cross-Record Patterns and Connections

Economic dependence vs. locational restraint

The County repeatedly sought to preserve tax competitiveness and measure data-center revenue while simultaneously tightening where and how facilities could be built. This tension is the central policy through-line of the decade.

By-right development became politically unsustainable

The earliest 2015 CLI action, the 2019 Conditional Use decision, the 2022 Land Study, and the 2025 permanent Special Exception intent all point in one direction: decreasing political tolerance for unrestricted by-right data-center development.

Residential compatibility became progressively more concrete

Noise attenuation research evolved into explicit facade, acoustical barrier, generator-testing, setback, and substation-separation rules.

Power infrastructure migrated into land-use review

Transmission routing, undergrounding, generator counts, substation locations, and large-load power delivery went from technical background to explicit Board policy variables.

Grandfathering became the fault line of the mature regime

By 2025, much of the political disagreement was no longer about whether standards should tighten, but which existing applications and property expectations should be protected from the new rules.

Transit-oriented redevelopment emerged as a competing land-use priority

Late-2025 policy around Loudoun Gateway explicitly balances ongoing operation of existing data centers against future transit-oriented development, showing land scarcity and opportunity cost becoming central.

Administrative air-permit certifications are a hidden growth indicator

Dozens of certifications for generators and facilities show ongoing physical expansion even when the Board's headline policy debate was increasingly restrictive. The administrative record can therefore be used to test whether regulatory tightening actually slowed or merely redirected development.

Potential Red Flags and Investigative Leads

Priority	Lead	What to test
HIGH	Campaign finance vs. specific land-use votes	Build a vote-by-vote dataset for major data-center applications and countywide zoning changes, then overlay contributions from developers, landowners, law firms, engineering firms, utilities, and industry groups. The corpus does not establish influence; this is a verification path.
HIGH	Tax revenue vs. infrastructure cost	Quantify annual data-center tax revenue against County/state costs tied to transmission, road improvements, environmental mitigation, noise, staffing, and proposed undergrounding. The Board itself repeatedly linked fiscal analysis to policy.
HIGH	Grandfathering beneficiaries	Identify every administrative and legislative application protected by the 2025 grandfathering rules, the property owners/operators involved, and the economic value of retaining pre-rule entitlements.
HIGH	Route 28 / transmission corridor relationships	Map data-center campuses, Dominion transmission routes, County property exchanges/easements, substations, and related applications to determine which projects benefited from infrastructure-routing decisions.
MEDIUM-HIGH	Dulles Cloud South policy fight	Reconstruct the 2022 debate over whether Dulles Cloud South should receive special treatment or remain open to future legislative changes, including land ownership and industry advocacy.

MEDIUM-HIGH	Public rhetoric vs. recorded votes	For supervisors with strong public messaging on data centers, compare speeches/campaign statements to their actual votes on 2019, 2022, 2023, and 2025 policy changes and individual applications.
MEDIUM	Generator/environmental exposure	Use DEQ records to quantify generator counts, diesel capacity, testing schedules, variances, and proximity to residential areas, then compare against the timing of the County's generator/noise standards.
MEDIUM	Industry representation in advisory bodies	Trace Data Center Coalition representation on the Environmental Commission and other advisory bodies, including nominations, recusals, policy recommendations, and whether representatives participated in matters directly affecting the industry.
MEDIUM	Conditional/SPEX conversion impacts	Identify parcels whose development rights changed as data centers moved from core/permitted uses to conditional or special-exception status, and quantify value/entitlement impacts.
MEDIUM	Transit opportunity cost	Analyze how existing data centers around Loudoun Gateway constrain future transit-oriented development and compare assessed value/tax revenue against alternative development scenarios.

These are investigative leads, not allegations. Timing, association, donations, or shared interests do not establish quid pro quo, corruption, or improper influence without independent evidence.

Contradictions and Position-Change Tests

Economic promotion vs. restriction

The same institution that promoted “Data Center Alley,” defended tax incentives, and measured revenue later imposed increasingly restrictive siting and compatibility standards. This is an institutional policy evolution, not necessarily a contradiction; individual officials’ records should be tested separately.

Existing investment vs. future regulation

2022-2025 debates repeatedly distinguish protection of existing facilities/applications from tighter rules for future development. Public statements that blur this distinction may overstate or understate an official’s actual position.

Environmental policy vs. generator approvals

The Board simultaneously advanced energy-efficiency/noise/environmental standards and routinely certified large numbers of emergency generators. This is not inherently inconsistent because DEQ certifications may be ministerial, but it is a useful public-policy tension to explain.

Transit-oriented development vs. existing data-center land use

By 2025, the County explicitly sought to preserve future transit-oriented development while accommodating existing data centers near Loudoun Gateway. Officials' earlier support for those facilities should be compared with later redevelopment positions.

Undergrounding support vs. cost allocation

The policy evolved from seeking less-intrusive/underground transmission to asking who should pay. Tracking which officials supported undergrounding before and after cost-allocation proposals could reveal meaningful position changes.

Research Gaps

- The action reports summarize decisions but often omit full staff analysis, applicant presentations, public testimony, and the complete reasoning behind votes.
- The corpus does not contain comprehensive campaign-finance data, lobbying disclosures, property ownership histories, or all proffer documents needed to test donor-to-policy relationships.
- Administrative DEQ certification items document facilities/generators but do not by themselves show emissions, operating hours, testing frequency, or compliance history.
- The master corpus is built from records containing the phrase “data center”; relevant power, substation, zoning, tax, or land-use actions that omit that phrase may be missing.
- Individual supervisors' public statements, newsletters, campaign websites, interviews, and social-media posts are not systematically represented.
- Planning Commission and committee records should be incorporated for applications where Board action was the endpoint of a longer policy process.

Top 10 Follow-Up Investigations

11. Build a complete 2015-2025 data-center roll-call dataset by supervisor, motion type, project, and policy category.
12. Overlay VPAP/CFReports contributions by data-center developers, utilities, law firms, engineering firms, and industry organizations against the vote timeline.
13. Create a parcel-level map of all by-right, conditional, Special Exception, grandfathered, and prohibited data-center locations before and after Phase 1/2.
14. Identify all 2025 grandfathered applications and calculate the acreage, planned MW/load, operator, landowner, and estimated tax value preserved by grandfathering.
15. Reconstruct the Dulles Cloud South debate from TLUC, staff reports, land records, and stakeholder submissions.
16. Quantify annual data-center personal-property/real-estate revenue against County infrastructure and mitigation expenditures.
17. Create a Dominion/data-center transmission map showing projects, substations, easements, undergrounding proposals, and Board actions.
18. Build a generator database from DEQ permits: facility, generator count, fuel, capacity, permit date, testing schedule, nearby residences, and variance history.

19. Compare each current/recent supervisor’s public rhetoric on data centers with their recorded votes and amendments in the 2019, 2022, 2023, and 2025 turning-point proceedings.
20. Analyze Loudoun Gateway and other transit-area parcels for the fiscal and land-use opportunity cost of continued data-center occupancy versus transit-oriented redevelopment.

Appendix A - Representative Facility / Generator Certifications

These administrative items are included as a growth indicator. They should not be interpreted as discretionary policy endorsements unless the underlying item establishes that character.

Date	Operator / project	Location	Source
2017-04-20	RagingWire VA3	44245 Gigabit Plaza, Ashburn	Master p. 173
2017-09-05	Digital Realty Trust / Digital Loudoun 3	44602 Round Table Plaza, Ashburn	Master p. 183
2018-01-03	QTS Investment Properties Ashburn	22271 Broderick Drive, Sterling	Master p. 198
2018-03-22	Wheeler Data Center	24325 Wyckoff Drive, Sterling	Master pp. 206-207
2018-06-05	Compass Data Centers	Thunderball Drive, Leesburg	Master p. 220
2018-09-04	Hayden Technologies / Sentinel Ashburn	Leesburg / Sterling	Master pp. 231-232
2018-09-20	Vantage Data Centers	45200 Vantage Data Plaza, Sterling	Master p. 241
2019-04-02	Aligned Energy	Uunet Drive, Ashburn	Master p. 292
2020-04-07	Microsoft	19540 Compass Creek Parkway	Master p. 338
2021-07-20	Microsoft Ashburn	19540 Compass Creek Parkway	Master p. 391
2021-11-16	Microsoft Blue Ridge	24282 Quail Ridge Lane	Master p. 410
2022-03-01	Digital Western Lands	Multiple parcels	Master p. 452
2022-03-15	ASH 2 Lockridge	22426 Lockridge Road	Master p. 460
2022-06-07	Vizsla Ventures	Shellhorn / Lockridge	Master p. 483
2023-07-05	Vantage Data Centers VA2	22435 Glenn Drive	Master p. 635
2023-09-05	Leesburg IAD 01-04 / Amazon Data Services	Compass Creek Pkwy / Quail Ridge Lane	Master pp. 643-644

Source Note

Primary source used for this report: “Master Loudoun Data Center Corpus 2015-2025,” 881-page merged PDF supplied by the user. All page references in this report point to that master PDF. The report intentionally does not supplement the corpus with outside web research so that the chronology remains a clean primary-record analysis.

