



Martin Crim
Town Attorney
21 Main Street
Warrenton, VA 20186

With Copy To:

Robert Walton
Heather Jenkins
21 Main Street
Warrenton, VA 20186

August 17, 2023

Re: SDP-2023-6 plan resubmission

Dear Sir:

In connection with a site plan submission in response to the Town of Warrenton's ("**Town**") comments on SDP-2023-6, Amazon Data Services, Inc. hereby requests the Town invoke its discretion under Virginia Code § 2.2-3705.2 to exclude the below described information from disclosure pursuant to the Virginia Freedom of Information Act ("**FOIA**"). We understand that this written request for FOIA exclusion is a public record that is subject to public disclosure pursuant to FOIA. We further understand that this request, including a notation of the resulting approval or denial, will be scanned into the Town's land management system as a viewable public record.

We make this request for the following reasons:

- A. Code § 2.2-3705.2(14): The information proposed for exclusion is contained in engineering drawings, architectural drawings, construction drawings or other records that reveal any of the information below, the disclosure of which would jeopardize the safety or security of any person; any governmental facility, building, or structure; or any public or private commercial office, multifamily residential, or retail building:
 1. Critical infrastructure information or the location or operation of security equipment and systems of any public building, structure, or information storage facility, including ventilation systems, fire protection equipment, mandatory building emergency equipment or systems, elevators, electrical systems, telecommunications equipment and systems, or utility equipment and systems;
 2. Vulnerability assessments, information not lawfully available to the public regarding specific cybersecurity threats or vulnerabilities, or security plans and measures of an entity, facility, building structure, or information technology system, or software program;



- 3. Surveillance techniques, personnel deployments, alarm or security systems or technologies, or operational or transportation plans or protocols; or
- 4. Interconnectivity, network monitoring, network operation centers, master sites, or systems related to the Statewide Agencies Radio System (STARS) or any other similar local or regional public safety communications system.

Such information is found on the sheets/pages of the records submitted and is described as follows:

The datacenters depicted in the plans and information support critical functions for both Amazon and its customers (both private and public) in different industries, including banking, healthcare, defense, government, etc. Disclosure of these could enable others to exploit security vulnerabilities to adversely impact Amazon, its customers, and their respective end users.

- B. Code § 2.2-3705.2(2): The information proposed for exclusion describes the design, function, operation, or access control features of any security system that is used to control access to or use of any automated data processing or telecommunications system. Such information is found on the sheets/pages of the records submitted and is described as follows:

The information contained in the sheets cited in the table below describe the design and access control features comprising the security system used to control access to or use of the applicant's automated data processing or telecommunications system. Disclosure of the information in the cited sheets would undermine the physical security measures implemented by applicant.

If this request is approved by Town staff, the following representatives of the applicant, upon providing satisfactory proof of identity, may access, view, and/or receive hard copies of the non-redacted records and information to which an exclusion may apply:

Applicant's representatives from Bohler Engineering and Corgan

Concurrent with the submission of this request, we submit an electronic version of the applicable record(s) with the requisite redactions, for inclusion in the public file. We also submit a complete file for the Town to continue its review of the plans.

AMAZON DATA SERVICES, INC. Signed by:

By: Josh Weissman
68784E59B2CD47C...

Name: Josh weissman

Title: Authorized Signatory

Date Signed: August 21, 2023



Item	Statutory Citation	Sheet Numbers	Justification for Requested Exclusion
1	Va. Code § 2.2-3705.2(14)	C-106, C-107, C-108, C-109, C-111, C-301, C-302, C-303, C-304, C-305, C-306, C-307, C-401, C-402, C-403, C-404, C-405, C-407, C-408, C-501, C-502, C-503, C-504, C-505, C-512, C-602, C-709, C-710, C-711, C-712, C-715, C-715, C-717, C-718, C-904, CS-401, CS-402, CS-403, CS-404, CS-405, CS-501, CS-502, CS-503, CS-504, CS-505.	<p>The sheets listed under Item 1 are a part of applicant's engineering and construction drawings, architectural drawings, and other records, and reveal the layout of the facility and individual buildings, personnel deployments, operational and/or transportation plans. This includes, for example, information concerning the location of the perimeter fence and materials used in its construction, security systems or technologies applicant uses, the facility's security plans and measures, and information including electrical systems and utility equipment and systems.</p> <p>Physical security is a central pillar of cybersecurity because physical breaches can facilitate hacking. Implementing stringent physical security measures mitigates risks against this danger.</p> <p>Disclosure of this information would jeopardize the safety or security of persons at the facility and, more broadly, could jeopardize the security of individuals relying upon the continuous functionality of the services provided by the facility due to the unique nature of applicant's customers. Failure to preserve the confidentiality of this information would also create a cybersecurity vulnerability, impermissibly reveal the security plans and measures of the facility, building structures, and information technology systems contained in the buildings. Due to the unique nature of applicant's customers, which includes public and private clients, disclosure of this information could impermissibly reveal the location or operation of security equipment and systems of about the site's electrical systems, telecommunications equipment and systems, or utility equipment and systems.</p>
2	Va. Code § 2.2-3705.2(2)	C-106, C-107, C-108, C-109, C-111, C-301, C-302, C-303, C-304, C-305, C-306, C-307, C-401, C-402, C-403, C-404, C-405, C-407, C-	The sheets listed under Item 2 are a part of applicant's engineering and construction drawings and plans which describe various security features of the facility and buildings and being constructed by the applicant to house an automated data processing system or telecommunications system. This includes information concerning the location of the perimeter fence and materials used in its construction, security systems or technologies applicant uses



		408, C-501, C-502, C-503, C-504, C-505, C-602, C-709, C-710, C-711, C-712, C-715, C-717, C-718, C-902, C-904, CS-401, CS-402, CS-403, CS-404, CS-405, CS-501, CS-502, CS-503, CS-504, CS-505.	to control access to the facility or buildings, and the location(s) of manual or automated security features.
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