

STOKES COUNTY
PLANNING AND INSPECTIONS DEPARTMENT

STAFF REPORT

Conditional Zoning District Application *"Project Delta"*

Applicant/Petitioner: Engineered Land Solutions, LLC

Property Owner: DFC Stokes, LLC and DFC Stokes 2, LLC

Request: Rezoning from Residential-Agricultural (R-A) to Heavy Manufacturing Conditional Zoning District (M-2-CZ)

Property PINs: 6964-91-8321; 6973-49-0574; 6973-76-7124; 6973-73-4188

Total Acreage: +/- 1,848.74 acres

Location: Along US Highway 311, Tuttle Road, Oldtown Road, and Coon Joyce Road, in the vicinity of Walnut Cove, North Carolina

Public Information Meeting: July 8, 2026, 5:00-6:00 p.m., Stokes County Administrative Building, 1014 Main Street, Danbury, NC

*Prepared by the Stokes County Planning and Inspections Department
For consideration by the Stokes County Planning Board and Board of Commissioners*

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1. Executive Summary

Engineered Land Solutions, LLC ("the Applicant"), acting on behalf of the property owners DFC Stokes, LLC and DFC Stokes 2, LLC, has petitioned Stokes County to rezone four contiguous and proximate parcels totaling approximately 1,848.74 acres from Residential-Agricultural (R-A) to a Heavy Manufacturing Conditional Zoning District (M-2-CZ) (Combined Rezoning Package, Application Cover Sheet, p. 8). The property is located along US Highway 311, Tuttle Road, Oldtown Road, and Coon Joyce Road, generally between the Town of Walnut Cove and the Dan River, and is identified by Stokes County Parcel Identification Numbers 6964-91-8321, 6973-49-0574, 6973-76-7124, and 6973-73-4188 (Combined Rezoning Package, Application Cover Sheet, p. 8).

The Applicant proposes to develop the property for a data center campus and supporting infrastructure, subject to a series of use restrictions and development standards proposed as conditions of the requested zoning district (Combined Rezoning Package, Statement of Conditions, pp. 3-7). These conditions address, among other matters, permitted and prohibited uses, building height, lighting, noise, setbacks and buffers, cooling-system technology and water use, floodplain protection, and generator use (Combined Rezoning Package, Statement of Conditions, pp. 3-7).

The Applicant held a Public Information Meeting ("PIM") on July 8, 2026, at the Stokes County Administrative Building, as required by Section 132.2 of the Stokes County Zoning Ordinance (Combined Rezoning Package, Public Information Meeting Report, pp. 10-13); ¹. The PIM Report documents seventeen topic areas raised by attendees, including project structure, floodplain protection, cultural and historical resources, noise, power and electric generation, water, air quality, lighting, fire and safety, property values, and tax revenue (Combined Rezoning Package, Public Information Meeting Report, pp. 10-13). In response to input received, the Applicant revised several proposed conditions prior to filing, including increasing the vegetative buffer adjacent to residential uses from 100 feet to 250 feet, lowering the permitted noise limits for residential-adjacent areas and adding a C-weighted (low-frequency) sound limit, and prohibiting the use of groundwater, private wells, or the Dan River as a water source for the facility (Combined Rezoning Package, Public Information Meeting Report, pp. 10-13).

This report has been prepared by Planning and Inspections Department staff to assist the Planning Board in its review of the application under N.C. Gen. Stat. § 160D-604², and to support the Board of Commissioners' subsequent statutory findings under N.C. Gen. Stat. § 160D-605³, including a statement of consistency with the Stokes County 2035 Vision Plan and a statement analyzing the reasonableness of the proposed rezoning. This report addresses the application's consistency with the adopted Comprehensive Plan and evaluates cumulative water, wastewater, and energy impacts; noise; environmental justice considerations; compatibility with surrounding land uses; cultural and historical resources; and infrastructure capacity, in the order set out below.

¹Stokes County Zoning Ordinance § 132.2, Public Information Meeting (PIM) — <https://cms9files.revize.com/stokescountync/Planning%20&%20Inspections/Documents/StokesCountyZoningOrdinance26.pdf>

²N.C. Gen. Stat. § 160D-604 — https://www.ncleg.gov/EnactedLegislation/Statutes/PDF/BySection/Chapter_160D/GS_160D-604.pdf

³N.C. Gen. Stat. § 160D-605 — https://www.ncleg.gov/EnactedLegislation/Statutes/PDF/BySection/Chapter_160D/GS_160D-605.pdf

2. Application and Procedural Background

2.1 Nature of the Request

The Applicant seeks approval of a conditional zoning district, a mechanism authorized under N.C. Gen. Stat. § 160D-703, which allows the Board of Commissioners to approve site-specific development standards proposed by an applicant as binding conditions of the rezoning Chapter 160D, Article 7⁴. If approved, the M-2-CZ district would govern development of the property in place of the current R-A district, subject to the conditions proposed in the application. Any additional condition the Board of Commissioners might wish to add during its review would require the Applicant's written consent before it could become part of an approved conditional zoning district, as discussed in Section 2.4 below N.C. Gen. Stat. § 160D-703(b)⁵. Staff also notes that a data center use of this scale is not a by-right use in the M-2 district; it is authorized only through Ordinance Amendment R, adopted July 13, 2026, which added data centers as a use permitted in the M-2 district solely by conditional zoning district approval under Stokes County Zoning Ordinance § 92.2, and is discussed further in Section 6.3 below ⁶.

2.2 Notice and Public Meeting Requirements

Section 132.2 of the Stokes County Zoning Ordinance requires an applicant for a conditional zoning district rezoning to hold a public information meeting prior to the application deadline, for the purpose of informing nearby property owners and the public of the proposed request and receiving input ⁷. The ordinance requires that notice of the meeting's date, time, and place be mailed to owners of all abutting properties and properties directly across a street, easement, or right-of-way, postmarked at least fourteen days before the meeting, and that a sign advertising the meeting be posted on the property at least fourteen days beforehand ⁸. N.C. Gen. Stat. § 160D-601 separately governs the procedure for the Board of Commissioners' own legislative hearing on the zoning amendment itself (mailed and posted notice under § 160D-602, and published newspaper notice under § 160D-601); Chapter 160D does not itself impose a pre-application public information meeting requirement, and that requirement instead arises solely from Section 132.2 of the Stokes County Zoning Ordinance, discussed above N.C. Gen. Stat. § 160D-601⁹; ¹⁰. The Applicant provided notice of the PIM by mail to adjoining and nearby property owners

⁴Chapter 160D, Article 7 —

https://www.ncleg.gov/EnactedLegislation/Statutes/PDF/BySection/Chapter_160D/GS_160D-703.pdf

⁵N.C. Gen. Stat. § 160D-703(b) —

https://www.ncleg.gov/EnactedLegislation/Statutes/PDF/BySection/Chapter_160D/GS_160D-703.pdf

⁶Stokes County Zoning Ordinance § 92.2, as amended by Amendment R (adopted July 13, 2026) —

<https://www.co.stokes.nc.us/departments/planning.php>

⁷Stokes County Zoning Ordinance § 132.2, Public Information Meeting (PIM) —

<https://cms9files.revize.com/stokescountync/Planning%20&%20Inspections/Documents/StokesCountyZoningOrdinance26.pdf>

⁸Stokes County Zoning Ordinance § 132.2, Public Information Meeting (PIM) —

<https://cms9files.revize.com/stokescountync/Planning%20&%20Inspections/Documents/StokesCountyZoningOrdinance26.pdf>

⁹N.C. Gen. Stat. § 160D-601 —

https://www.ncleg.gov/EnactedLegislation/Statutes/PDF/BySection/Chapter_160D/GS_160D-601.pdf

¹⁰Stokes County Zoning Ordinance § 132.2, Public Information Meeting (PIM) —

<https://cms9files.revize.com/stokescountync/Planning%20&%20Inspections/Documents/StokesCountyZoningOrdinance26.pdf>

and conducted the meeting on July 8, 2026, from 5:00 to 6:00 p.m. on the second floor of the Stokes County Administrative Building, 1014 Main Street, Danbury, North Carolina (Combined Rezoning Package, Public Information Meeting Report, pp. 10-13).

N.C. Gen. Stat. § 160D-601 further requires published newspaper notice, and § 160D-602 requires mailed notice to owners of the subject property and abutting parcels, both prior to the public hearing on the proposed zoning map amendment N.C. Gen. Stat. § 160D-601¹¹; N.C. Gen. Stat. § 160D-602¹². These are hearing-notice obligations of the County for the Planning Board and Board of Commissioners hearings on this application, which have not yet occurred as of the date of this report; staff will confirm compliance with §§ 160D-601 and 160D-602 as part of the standard hearing-scheduling process, and will provide the Board with proof of publication and mailing prior to each hearing.

2.3 Planning Board and Governing Board Review

N.C. Gen. Stat. § 160D-604 requires that proposed zoning map amendments be submitted to the Planning Board for review and comment, including a written recommendation addressing the amendment's consistency with the adopted Comprehensive Plan N.C. Gen. Stat. § 160D-604(b)¹³. A Planning Board recommendation that an amendment is inconsistent with the Comprehensive Plan does not preclude the Board of Commissioners from approving the amendment N.C. Gen. Stat. § 160D-604(d)¹⁴.

Following Planning Board review, N.C. Gen. Stat. § 160D-605 requires the Board of Commissioners to approve a brief statement of consistency (or inconsistency) with the adopted Comprehensive Plan when it takes action on the amendment, as well as a separate statement analyzing the reasonableness of the proposed rezoning N.C. Gen. Stat. § 160D-605(a)-(b)¹⁵. The reasonableness statement may consider the size and physical conditions of the area to be rezoned; benefits and detriments to landowners, neighbors, and the surrounding community; the relationship between the current actual and permissible development and the development that would be permissible under the proposed amendment; why the action is in the public interest; and any changed conditions warranting the amendment N.C. Gen. Stat. § 160D-605(b)¹⁶. This report is intended to provide the factual record to support both statements.

2.4 Enforceability of Conditions and Binding Effect on Future Owners

The PIM Report reflects that attendees asked whether the commitments proposed in the Statement of Conditions would remain binding if the property were sold or the facility were operated by a different company in the future (Combined Rezoning Package, Public Information Meeting Report, pp. 10-13). Staff addresses the applicable statutory framework below.

¹¹N.C. Gen. Stat. § 160D-601 —

https://www.ncleg.gov/EnactedLegislation/Statutes/PDF/BySection/Chapter_160D/GS_160D-601.pdf

¹²N.C. Gen. Stat. § 160D-602 —

https://www.ncleg.gov/EnactedLegislation/Statutes/PDF/BySection/Chapter_160D/GS_160D-602.pdf

¹³N.C. Gen. Stat. § 160D-604(b) —

https://www.ncleg.gov/EnactedLegislation/Statutes/PDF/BySection/Chapter_160D/GS_160D-604.pdf

¹⁴N.C. Gen. Stat. § 160D-604(d) —

https://www.ncleg.gov/EnactedLegislation/Statutes/PDF/BySection/Chapter_160D/GS_160D-604.pdf

¹⁵N.C. Gen. Stat. § 160D-605(a)-(b) —

https://www.ncleg.gov/EnactedLegislation/Statutes/PDF/BySection/Chapter_160D/GS_160D-605.pdf

¹⁶N.C. Gen. Stat. § 160D-605(b) —

https://www.ncleg.gov/EnactedLegislation/Statutes/PDF/BySection/Chapter_160D/GS_160D-605.pdf

Under N.C. Gen. Stat. § 160D-703(b), conditions approved as part of a conditional zoning district are incorporated into the zoning regulations applicable to the property N.C. Gen. Stat. § 160D-703(b)¹⁷. Because those conditions become part of the zoning district classification itself, a legislative enactment, rather than a separate permit or development approval, they remain binding on the property regardless of a subsequent change in ownership or operator, unless and until the zoning is lawfully amended through the same process required for the original rezoning. (N.C. Gen. Stat. § 160D-104's separate "development approvals run with the land" provision does not independently apply to this conclusion: § 160D-102(13) defines "development approval" as limited to administrative or quasi-judicial approvals, and § 160D-102(7) expressly defines conditional zoning as a legislative zoning map amendment, not an administrative or quasi-judicial development approval N.C. Gen. Stat. § 160D-102¹⁸.) Accordingly, if the Board of Commissioners approves the M-2-CZ district with the conditions proposed in the Statement of Conditions (or as modified by the Board), those conditions would remain enforceable against the property regardless of any subsequent change in ownership or operator, unless and until the zoning is lawfully changed.

Separately, N.C. Gen. Stat. § 160D-703(b) governs how conditions attached to a conditional zoning district may later be modified, and also governs how conditions may be added in the first instance: any condition proposed by the Board of Commissioners beyond those the Applicant itself proposed becomes part of the approved district only with the Applicant's written consent. Except for minor modifications as may be defined by ordinance, any subsequent change to the approved conditions likewise requires the same approval process as the original zoning map amendment, including Planning Board review and a Board of Commissioners public hearing; a future owner or operator could not unilaterally alter the approved conditions without going through this same public process N.C. Gen. Stat. § 160D-703(b)¹⁹. Enforcement of the conditions as approved would occur through the County's standard zoning compliance and code enforcement mechanisms, in the same manner as any other zoning condition of record.

¹⁷N.C. Gen. Stat. § 160D-703(b) —

https://www.ncleg.gov/EnactedLegislation/Statutes/PDF/BySection/Chapter_160D/GS_160D-703.pdf

¹⁸N.C. Gen. Stat. § 160D-102 —

https://www.ncleg.gov/EnactedLegislation/Statutes/PDF/BySection/Chapter_160D/GS_160D-102.pdf

¹⁹N.C. Gen. Stat. § 160D-703(b) —

https://www.ncleg.gov/EnactedLegislation/Statutes/PDF/BySection/Chapter_160D/GS_160D-703.pdf

3. Site and Surrounding Area Description

3.1 Location and Physical Characteristics

The subject property consists of four parcels the Applicant reports as totaling approximately 1,848.74 acres, based on the Applicant's own survey and title data (Combined Rezoning Package, Application Cover Sheet, p. 8). Staff's independent query of the Stokes County GIS parcel layer returns a combined tax/deeded acreage of 1,848.38 acres and a combined calculated (geometric) acreage of approximately 1,827.76 to 1,828.08 acres for the same four parcels, depending on the specific GIS acreage field consulted; the approximately 20-acre difference between the Applicant's figure and the GIS parcel layer is consistent with the ordinary variance between recorded deed acreage and GIS-calculated geometric acreage and does not affect any conclusion in this report ²⁰. For consistency with the application materials, this report uses the Applicant's reported figure of approximately 1,848.74 acres throughout, except where a GIS-specific calculation is separately cited. The property is located along US Highway 311, Tuttle Road, Oldtown Road, and Coon Joyce Road, north and east of the Town of Walnut Cove and north of the Dan River, in southeastern Stokes County. The property is currently zoned Residential-Agricultural (R-A), which staff independently confirmed using the Stokes County GIS's official zoning layer ²¹. Portions of the property lie within the Dan River floodplain, as mapped on FEMA Flood Insurance Rate Map panels 3710696200K and 3710696400K, effective June 10, 2026 (Combined Rezoning Package, Statement of Conditions, pp. 3-7). Staff independently confirmed June 10, 2026 as the current effective countywide flood map date for Stokes County using ²². The floodplain overlap figures discussed in Section 4.1 below are calculated using the Stokes County GIS's Flood Zones layer, which staff uses as a planning-level proxy for the effective FIRM panels; staff notes for completeness that this GIS layer's own metadata carries a 2006 revision date, and while staff independently confirmed June 10, 2026 as the current effective FIRM date through FEMA's Flood Map Service Center directly, the underlying GIS layer geometry has not been independently confirmed to reflect every boundary change made in subsequent map revisions. This is a methodological note relevant to the precision of the acreage figures in Section 4.1, not to the conclusion that portions of the property lie within the mapped floodplain, which is independently supported by the FIRM panel excerpts reproduced below. Excerpts of both effective panels are reproduced below.

²⁰Stokes County GIS, Parcel layer —

<https://stokescountygis.com/server/rest/services/AllLayers/MapServer>

²¹Stokes County GIS, County Zoning layer —

<https://stokescountygis.com/server/rest/services/AllLayers/MapServer>

²²FEMA's Flood Map Service Center — <https://msc.fema.gov/portal/productAvailability>

Without Base Flood Elevation (BFE)
With BFE or Depth (X, AE, AH, VE, AR)

SPECIAL FLOOD HAZARD AREAS

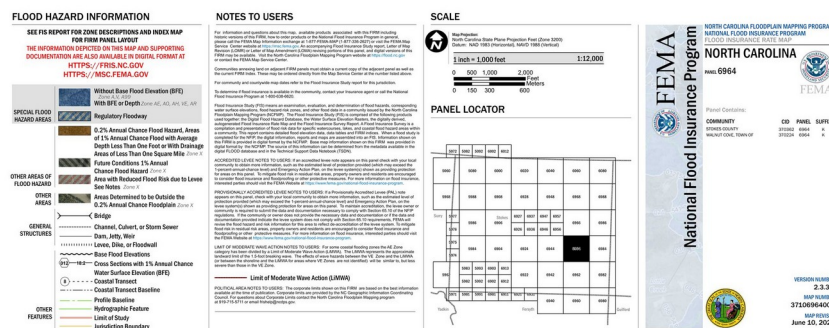
- 0.2% Annual Chance Flood Hazard
- Areas of 1% Annual Chance Flood with Average Depth Less Than One Foot or with Damaging Features
- Areas of Less Than One Square Mile
- Future Conditions 1% Annual Chance Flood Hazard (Zones X)
- Are an Annual Flood Risk due to Levees (See Notes Z)
- Areas Determined to be Outside the 0.2% Annual Flood Hazard (Zones X)

OTHER AREAS OF FLOOD HAZARD

- Bridge
- Channel, Culvert, or Storm Sewer
- Dam, Jetty, Weir
- Levee, Dike, or Floodwall
- Base Flood Elevation (BFE)
- 0.2-100 - Cross Sections with 1% Annual Chance Water Surface Elevation (BFE)
- Coastal Truncation
- Coastal Truncation Baseline
- Profile Baseline
- Hydrographic Feature
- Line of Study
- Intervenor Boundaries

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FEMA Flood Insurance Rate Map Panel 3710696400K, Stokes County, NC, effective June 10, 2026

3.2 Surrounding Zoning and Land Uses

Staff independently queried the Stokes County GIS's official zoning boundary layer (as distinct from the parcel/tax layer, which staff confirmed is not always current) to calculate the zoning composition of land within one-half mile and one mile of the subject property's boundary, using a geographic information system buffer and area-clipping analysis ²³. The buffer areas analyzed (5,329 acres at one-half mile and 9,670 acres at one mile) are measured outward from the property's boundary and, as is standard GIS buffer methodology, include the subject property's own acreage within the total analyzed area. On that basis — that is, counting the approximately 1,828 to 1,849 acres of the subject property itself, which is presently zoned R-A, within both the denominator and the R-A numerator — Residential-Agricultural (R-A) zoning accounts for approximately 73.5 percent of the total land area within one-half mile (roughly 3,918 of 5,329 acres) and approximately 69.4 percent within one mile (roughly 6,713 of 9,670 acres) ²⁴. Because the subject property is itself included in these totals, staff also calculated the same percentages on a surrounding-land-only basis, excluding the subject property's own acreage from both the denominator and the R-A numerator: on that basis, R-A zoning accounts for approximately 59.7 percent of land surrounding the property within one-half mile and approximately 62.3 percent within one mile ²⁵. Both figures are provided so the Board can evaluate surrounding zoning composition on either basis; the absolute acreage of industrially-zoned land discussed immediately below is unaffected by this distinction, since none of the subject property itself carries an industrial zoning classification.

Industrial zoning classifications (M-1, M-1-CZ, and M-2-CU, together with a small acreage carrying the "I-1" designation, which is a Town of Walnut Cove municipal zoning district rather than a Stokes County Zoning Ordinance district and applies here because this portion of the county's GIS zoning layer falls within Walnut Cove's extraterritorial jurisdiction) account for the next-largest share of surrounding land: approximately 1,394 acres, or 26.1 percent of the total one-half-mile buffer area (39.8 percent on a surrounding-land-only basis excluding the subject property), and approximately 2,744 acres, or 28.4 percent of the total one-mile buffer area (35.0 percent on a surrounding-land-only basis excluding the subject property) ²⁶. This industrial acreage is attributable to a small number of large tracts rather than numerous small parcels, including a tract owned by Samuel Wilson Farms of Stokes, LLC, at 1998 Tuttle Road; a tract owned by Pine Hall Brick, Inc., used for brick manufacturing; a tract owned by RENEWA I, LLC, at 1180 Burton Loop Road; and the Duke Energy Corporation's Belews Creek Steam Station property, a 6,011.51-acre tract addressed at Steam Station Road, portions of which fall within the one-mile analysis radius ²⁷. Staff notes that while Residential-Agricultural zoning remains the largest single category of surrounding land by area, the immediate vicinity already contains a substantial concentration of industrial and utility-scale energy zoning — more than one-quarter of all surrounding land within one mile — such that the area is not exclusively or even overwhelmingly rural-residential in character. The presence of

²³Stokes County GIS, County Zoning layer —

<https://stokescountygis.com/server/rest/services/AllLayers/MapServer>

²⁴Stokes County GIS, County Zoning and Parcel layers —

<https://stokescountygis.com/server/rest/services/AllLayers/MapServer>

²⁵Stokes County GIS, County Zoning and Parcel layers —

<https://stokescountygis.com/server/rest/services/AllLayers/MapServer>

²⁶Stokes County GIS, County Zoning layer —

<https://stokescountygis.com/server/rest/services/AllLayers/MapServer>

²⁷Stokes County GIS, Parcel layer —

<https://stokescountygis.com/server/rest/services/AllLayers/MapServer>

these existing industrial and utility uses in the immediate vicinity is a relevant consideration in evaluating compatibility, discussed further in Section 5.

Looking beyond the one-mile buffer used for the percentage analysis above, staff also independently mapped industrial-zoned parcels and active state mining permits in the broader area surrounding the subject property, out to approximately two to three miles, using the Stokes County GIS zoning layer together with the North Carolina Department of Environmental Quality's Division of Energy, Mineral, and Land Resources mining permit records²⁸; ²⁹. That review identified two Pine Hall Brick, Inc. tracts carrying active state mining permits (the Kluttz Mine, Permit 85-08, and the Pipe Plant Mine, Permit 85-11); a cluster of industrially-zoned parcels held in common ownership east of the subject property, referred to in this report as the "M-1 Parcels" and totaling approximately 285 acres, with no active state mining permit currently associated with them; and Martin Marietta Materials parcels zoned predominantly Residential-Agricultural (R-A), with approximately 63 acres of the Burton Road parcel (PIN 6972-56-5849) zoned M-1-CZ, also with no confirmed active state mining permit³⁰; ³¹. This broader-area review is provided for additional context on the extent of existing industrial and mineral-extraction activity in the vicinity and does not alter the one-mile zoning composition figures presented above. Staff also notes, for the Board's awareness, the statutory effect of the zoning map amendment itself on the county's adopted plan: N.C. Gen. Stat. § 160D-605(a)³² provides that "[i]f a zoning map amendment is adopted and the action was deemed inconsistent with the adopted plan, the zoning amendment has the effect of also amending any future land-use map in the approved plan, and no additional request or application for a plan amendment is required."

²⁸Stokes County GIS, County Zoning layer —

<https://stokescountygis.com/server/rest/services/AllLayers/MapServer>

²⁹NC DEQ/DEMLR Mining Program, Mining Permits —

https://services2.arcgis.com/kCu40SDxsCGcuUWO/arcgis/rest/services/NC_Mining_Permits/FeatureServer/0

³⁰Stokes County GIS, County Zoning and Parcel layers —

<https://stokescountygis.com/server/rest/services/AllLayers/MapServer>

³¹NC DEQ/DEMLR Mining Program, Mining Permits —

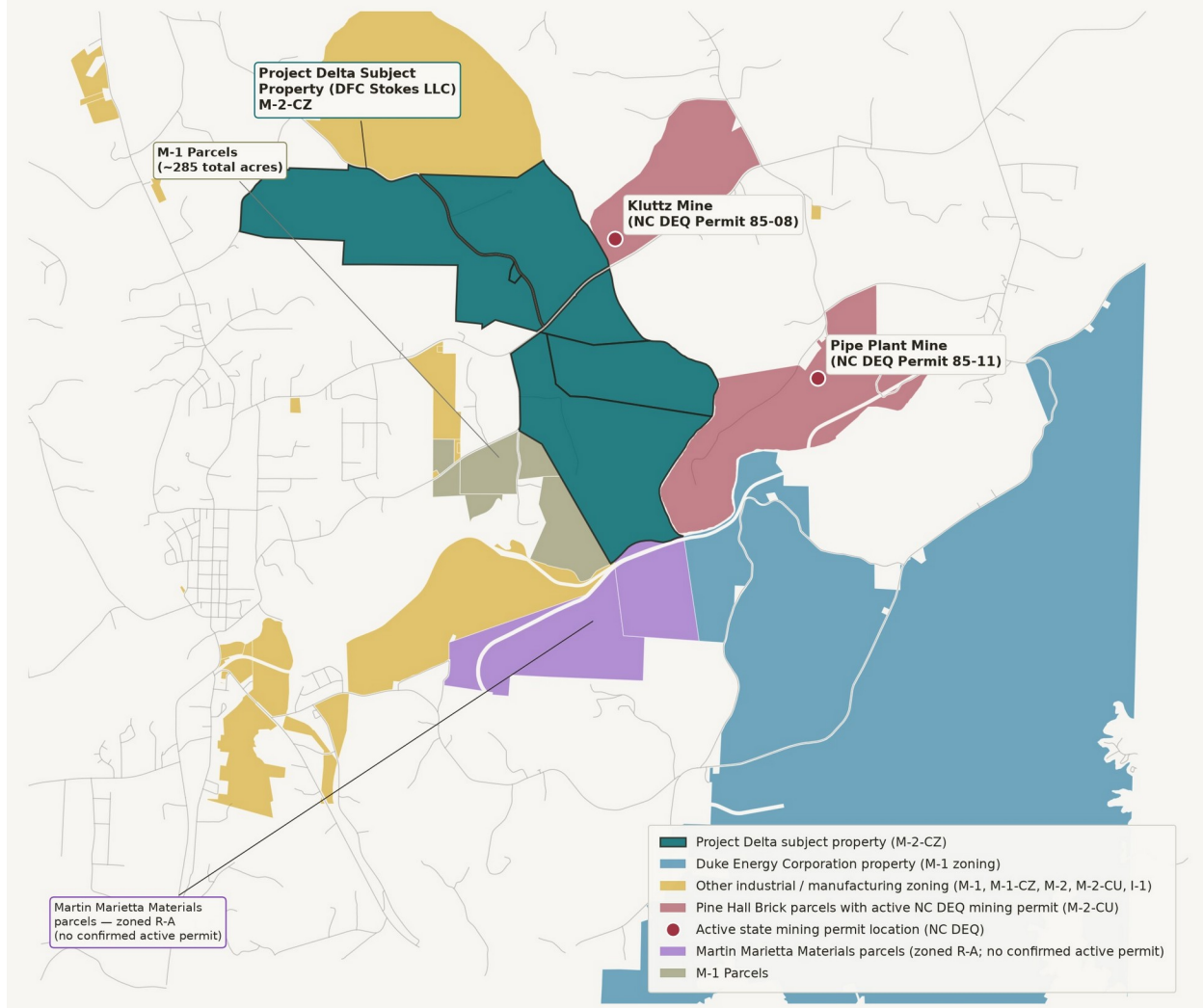
https://services2.arcgis.com/kCu40SDxsCGcuUWO/arcgis/rest/services/NC_Mining_Permits/FeatureServer/0

³²N.C. Gen. Stat. § 160D-605(a) —

https://www.ncleg.gov/EnactedLegislation/Statutes/HTML/BySection/Chapter_160D/GS_160D-605.html

Industrial-Zoned Properties & State Mining Permits Near Project Delta

Source: Stokes County GIS & NC DEQ/DEMLR Mining Program records. Rebuilt from primary sources, not the applicant's exhibit.



Industrial-zoned properties and state mining permits near Project Delta

Staff independently identified eight church-owned parcels and one large state-owned tract within one mile of the property boundary that warrant identification as sensitive uses³³. The Educational State Forest, a state-owned tract of approximately 838 to 848 acres depending on the GIS data source consulted (848.44 acres per the Stokes County GIS parcel layer's ACREAGE field; approximately 838.14 acres per staff's independent geometric calculation from the county's Parks layer boundary), directly adjoins the subject property along US Highway 311³⁴. Sycamore (Missionary) Baptist Church, at 1788-1804 US Highway 311, sits approximately 670 feet from the property boundary³⁵. Three parcels associated with

³³Stokes County GIS, Parcel and Parks layers —

<https://stokescountygis.com/server/rest/services/AllLayers/MapServer>

³⁴Stokes County GIS, Parks and Parcel layers —

<https://stokescountygis.com/server/rest/services/AllLayers/MapServer>

³⁵Stokes County GIS, Parcel layer —

<https://stokescountygis.com/server/rest/services/AllLayers/MapServer>

Baileytown Christian Church, along Baileytown Church Road, lie between approximately 1,700 and 2,540 feet from the property boundary, and Calvary Hill Baptist Church, Willow Oak Baptist Church, and Open Door Baptist Church are located between approximately 2,600 and 4,150 feet away ³⁶. Staff additionally identified an eighth church-owned parcel, associated with the Walnut Cove Congregation, at 1363 US Highway 311 South, approximately 3,393 feet from the property boundary ³⁷. Staff found no platted residential subdivisions within one mile of the property; nearby residential uses consist of individually-owned rural tracts along Tuttle Road, Farmer Road, and Baileytown Church Road rather than subdivided developments ³⁸.

³⁶Stokes County GIS, Parcel layer —

<https://stokescountygis.com/server/rest/services/AllLayers/MapServer>

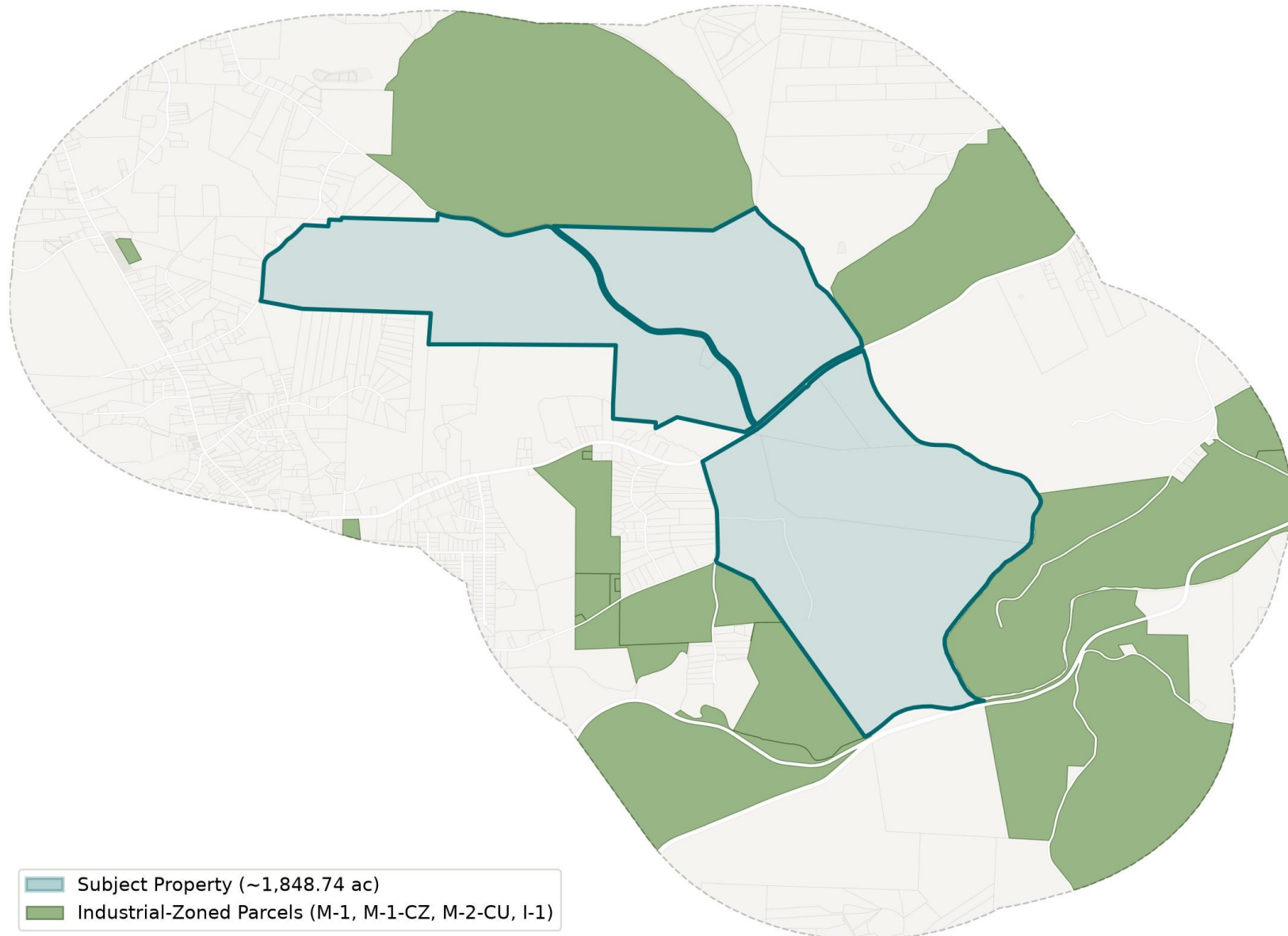
³⁷Stokes County GIS, Parcel layer —

<https://stokescountygis.com/server/rest/services/AllLayers/MapServer>

³⁸Stokes County GIS, Parcel layer —

<https://stokescountygis.com/server/rest/services/AllLayers/MapServer>

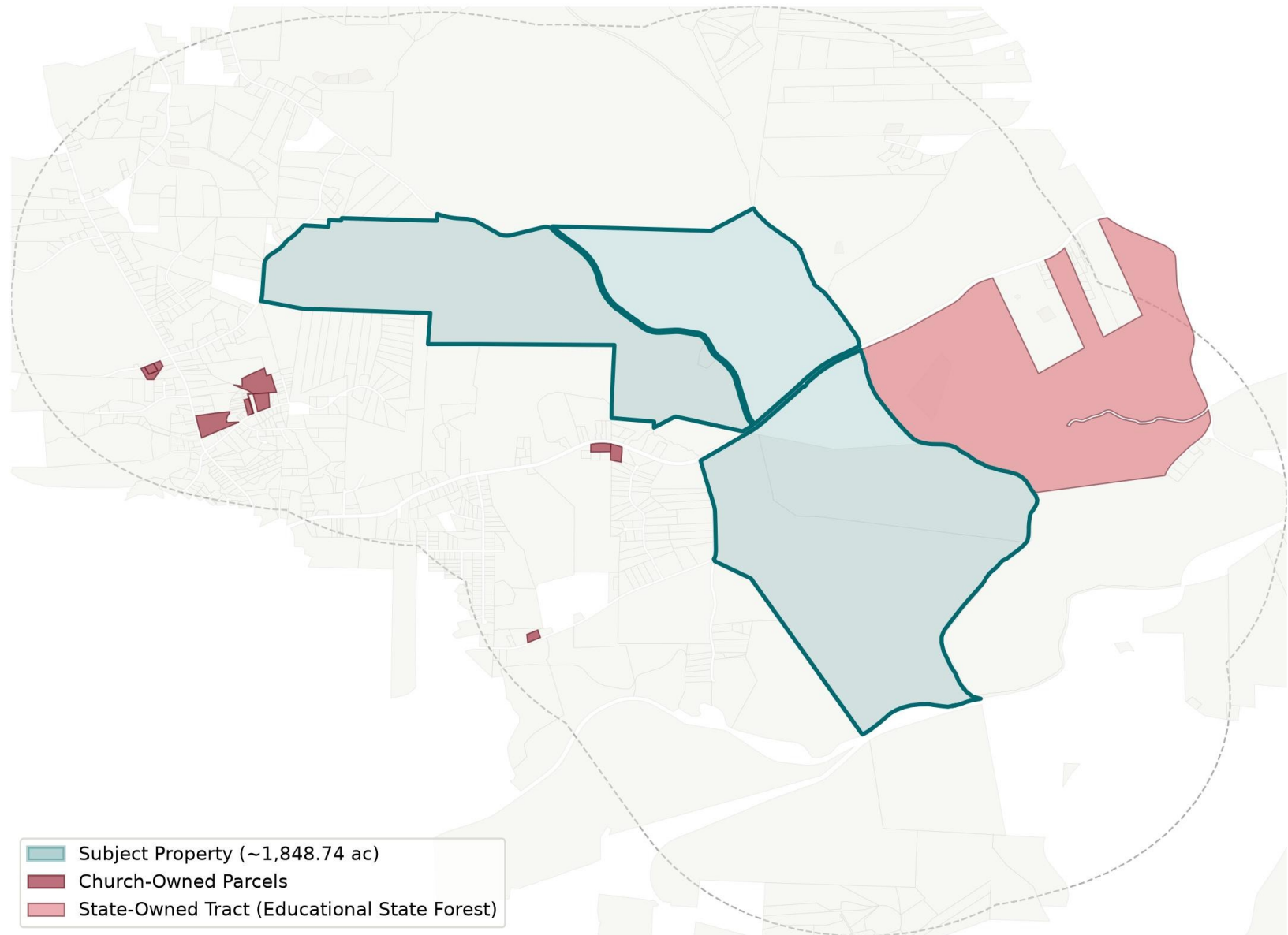
Industrial-Zoned Parcels Within One Mile of Subject Property



Source: Stokes County GIS, County Zoning Layer (Layer 27)

Industrial-zoned parcels (green) within one mile of the subject property

Sensitive Uses Within One Mile of Subject Property



Source: Stokes County GIS, Parcel and Parks Layers

Sensitive uses (red) within one mile of the subject property

3.3 Access and Transportation

The property has frontage on US Highway 311, a major highway corridor serving southeastern Stokes County, as well as Tuttle Road, Oldtown Road, and Coon Joyce Road (Combined Rezoning Package, Application Cover Sheet, p. 8; Stokes County 2035 Vision Plan, Chapter 6: Transportation, pp. 117-124). US Highway 311 is identified in the Stokes County 2035 Vision Plan as a significant transportation corridor within the county's transportation network (Stokes County 2035 Vision Plan, Chapter 6: Transportation, pp. 117-124).

4. Comprehensive Plan Consistency Analysis

N.C. Gen. Stat. § 160D-604 and § 160D-605 require that the Planning Board and Board of Commissioners each address whether the proposed zoning map amendment is consistent with the Stokes County 2035 Vision Plan, the County's adopted comprehensive plan N.C. Gen. Stat. §§ 160D-604(d), 160D-605(a)³⁹. This section identifies the Vision Plan provisions most directly applicable to the request.

4.1 Land Use Framework Designation

The Stokes County 2035 Vision Plan's Land Use Framework Map (reproduced below) classifies land throughout the unincorporated county using a rural-to-urban transect system ranging from Preserved Lands (O-1) and Reserved Lands/Conservation (O-2) through Low Density Growth Areas (G-1), Controlled Growth Areas (G-2), Mixed-Use Centers and Corridors (G-3), and Downtowns (G-4) (Stokes County 2035 Vision Plan, Chapter 3: Land Use, Map 13, p. 76). The Vision Plan states that the primary land use classification throughout the county's rural areas, including the vicinity of the subject property, is very low (greater than 4-acre density average) or low-density (1.5-acre density average) residential growth, with higher-density and mixed-use classifications reserved for twelve identified Rural Neighborhood Commercial Nodes and the areas around Danbury, Walnut Cove, King, and the Meadows community (Stokes County 2035 Vision Plan, Chapter 3: Land Use, pp. 75-76). The subject property, located in a rural area along US 311, Tuttle Road, and Oldtown Road north of Walnut Cove, spans three Framework Map classifications rather than falling within a single designation. Staff independently intersected the property's four parcel boundaries with the County's "Land Use 2035" GIS layer and calculated that approximately 888.7 acres (48.6 percent) carry the Low Density Growth Area (G-1) designation, approximately 620.5 acres (33.9 percent) carry the Preserved Lands (O-1) designation, and approximately 312.9 acres (17.1 percent) carry the Reserved Lands/Conservation (O-2) designation⁴⁰ (Stokes County 2035 Vision Plan, Chapter 3: Land Use, Map 13, p. 76). G-1 is accordingly the single largest designation on the property, though it does not cover a majority of the site, and none of the property carries a Controlled Growth Area (G-2), Mixed-Use Centers and Corridors (G-3), or Downtown (G-4) designation.

Staff further compared the boundary of the O-1-designated portion of the property against the boundary of the FEMA-mapped Dan River floodplain discussed in Section 3.1 above and found that the two areas are, for practical purposes, the same land: of the property's approximately 620.5 acres of O-1 designation, approximately 620.0 acres (more than 99 percent) fall within the mapped floodplain, and the floodplain in turn extends only marginally (less than one acre) beyond the O-1 boundary⁴¹; ⁴². As summarized in Appendix A below, the Applicant's proposed conditions restrict development within the mapped floodplain to infrastructure improvements and recreational, agricultural, conservation, preservation, and open space uses. Because the O-1 and floodplain boundaries are effectively coextensive, this floodplain restriction has the practical effect of leaving nearly all of the property's O-1-designated (Preserved Lands)

³⁹N.C. Gen. Stat. §§ 160D-604(d), 160D-605(a) —

https://www.ncleg.gov/EnactedLegislation/Statutes/PDF/BySection/Chapter_160D/GS_160D-605.pdf

⁴⁰Stokes County GIS, Land Use 2035 layer —

<https://stokescountygis.com/server/rest/services/WebApp2026/MapServer/34>

⁴¹Stokes County GIS, Land Use 2035 layer —

<https://stokescountygis.com/server/rest/services/WebApp2026/MapServer/34>

⁴²Stokes County GIS, Flood Zones layer —

<https://stokescountygis.com/server/rest/services/AllLayers/MapServer>

acreage undeveloped, which staff finds to be consistent with the Vision Plan's preservation intent for that designation.



LAND USE FRAMEWORK MAPS

The following maps provide a land use foundation for the County and its three (3) municipal jurisdictions.

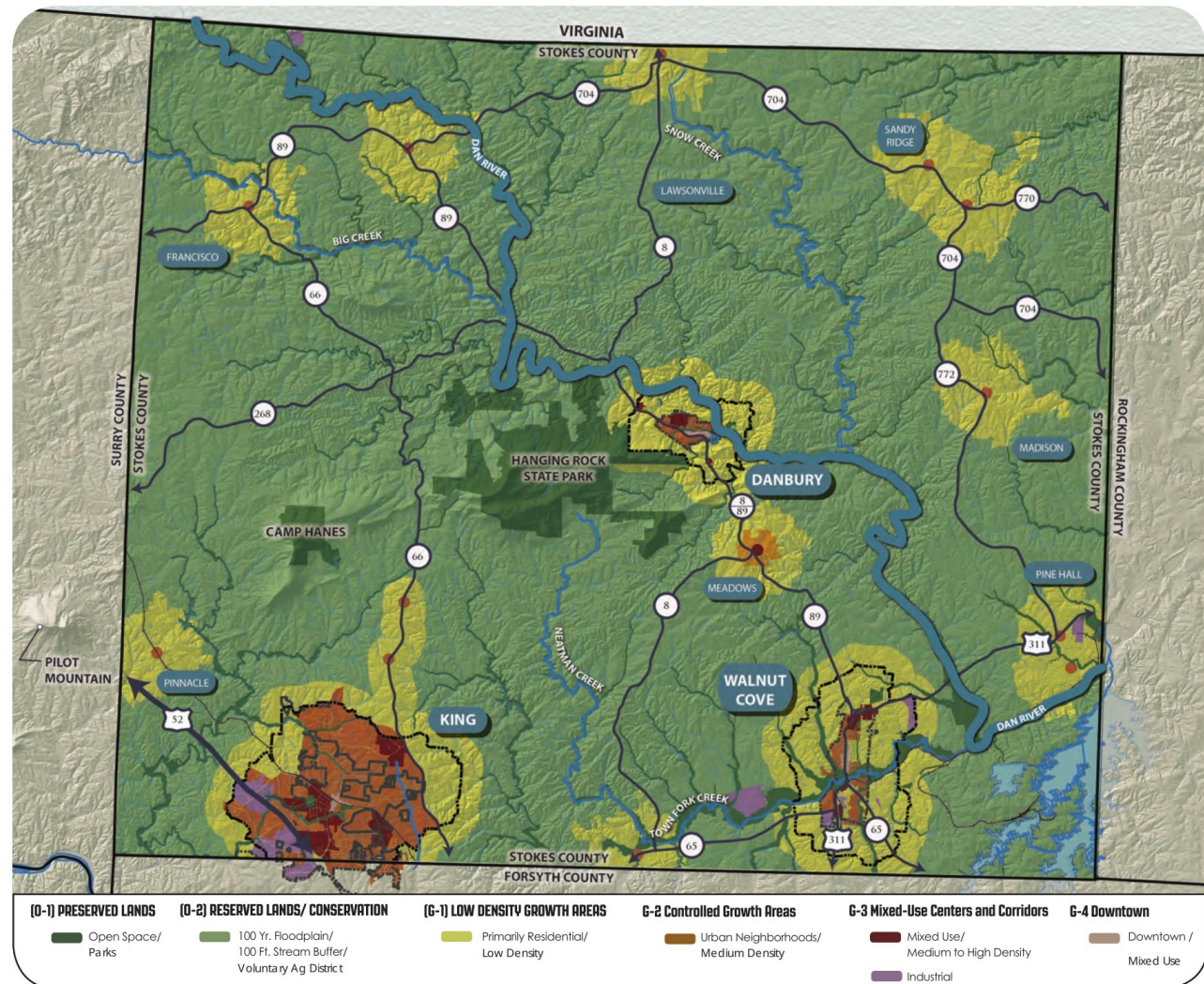
STOKES COUNTY

The primary land use classification throughout the County includes very low (greater than 4-acre density average) or low-density (1.5 acre density average) residential growth.

In an effort to encourage neighborhood commercial growth toward major intersections throughout the county, the Land Use Framework Map identifies twelve (12) Rural Neighborhood Commercial Nodes. A one-mile buffer around these nodes identifies a target low-density residential growth area.

The recent sewer infrastructure expansion to the Meadows community will allow for greater density and is necessary to realize a return on investment; a mixed-use and high-density classification surrounds Meadows.

This plan recognizes that growth pressure will likely continue along the Highway 66 corridor that extends north from King. There are two neighborhood commercial nodes identified along this corridor.



Map 13: Stokes County Land Use Framework Map

4.2 Economic Development Goals

The Vision Plan's Economic Development chapter identifies business recruitment as a primary county goal and states that the availability of "readily-available," or "shovel-ready," land is one of three conditions the county must meet to attract new business and industry investment, alongside organizational capacity and marketing (Stokes County 2035 Vision Plan, Chapter 4: Economic Development, pp. 91-93). The Vision Plan identifies lagging population growth, high poverty rates, and an aging workforce as challenges the county's economic development strategy is intended to address (Stokes County 2035 Vision Plan, Chapter 4: Economic Development, pp. 89-90). Staff confirms that the Vision Plan does identify specific parcels and corridors elsewhere in the county as targeted sites for industrial or business development — including the "Holder, Moore, and Newsome Drive properties" near Highway 52 and Newsome Road outside King, a conceptual "Newsome Road Corridor Industrial Complex," and a recommendation to explore commercial or industrial development "in the Pine Hall area from the 772/311 intersection to the county line" (Stokes County 2035 Vision Plan, Chapter 4: Economic Development, pp. 92-93). None of these named target sites include or adjoin the subject property; the Pine Hall-area recommendation, while it references the general US 311 corridor along which the subject property fronts, is directed at the 772/311 intersection area near the Rockingham County line rather than the subject tract. The proposed use, a large capital investment employing a large, contiguous tract, is generally consistent with the Vision Plan's stated interest in attracting significant business investment and its specific interest in industrial and commercial development along parts of the US 311 corridor, though the Vision Plan does not identify this specific property, by name or by parcel, as one of its targeted "shovel-ready" industrial sites. Staff further notes that the Vision Plan's economic development interest in this type of investment does not depend on, and this application does not request, any county incentive package, abatement, or other tax-supported funding.

4.3 Transportation Considerations

The Vision Plan's Transportation chapter identifies US Highway 311 as a significant highway corridor within the county and discusses the Sauratown Mountains as a natural physiographic feature dividing travel patterns in the county (Stokes County 2035 Vision Plan, Chapter 6: Transportation, pp. 117-124). The property's frontage on this corridor provides direct highway access without requiring new road construction through undeveloped rural areas, which is a relevant factor in the transportation-related aspects of Plan consistency.

4.4 Infrastructure Considerations

The Vision Plan's Infrastructure chapter states that the availability of water and sewer service is "a major determinant of where growth can occur" in Stokes County, and notes that many areas of the county have soil conditions that preclude individual septic systems, making infrastructure availability a limiting factor for development generally (Stokes County 2035 Vision Plan, Chapter 7: Infrastructure, pp. 125-129). This consideration is discussed further in Section 7 below in connection with the application's proposed water-service conditions.

4.5 Staff Observation on Consistency

The subject property is located in an area the Vision Plan's Land Use Framework Map generally characterizes as rural and residential/agricultural in character, rather than an area specifically identified for industrial growth. At the same time, the Vision Plan's Economic Development chapter identifies

attracting significant business investment as a county priority, and the property's frontage on a major highway corridor and proximity to existing industrial and utility uses (discussed in Section 5) distinguish it from a typical rural residential setting. Staff notes that Chapter 160D does not require the Board to find the rezoning consistent with the Vision Plan as a precondition to approval; rather, it requires the Board to analyze and state whether the action taken is or is not consistent with the adopted plan when it acts on the application, and a finding of inconsistency does not itself prevent approval N.C. Gen. Stat. § 160D-605(a)⁴³. Consistent with that requirement, the Board of Commissioners' plan consistency statement should address the relationship between the property's Land Use Framework designation and the Vision Plan's economic development objectives, informed by the analysis in this report. Should the Board conclude the rezoning is inconsistent with the Land Use Framework Map, N.C. Gen. Stat. § 160D-605(a) provides that approval of the zoning amendment operates to amend the future land-use map accordingly, without a separate plan amendment application N.C. Gen. Stat. § 160D-605(a)⁴⁴.

4.6 Statutory Framework for the Board's Consistency and Reasonableness Statements

N.C. Gen. Stat. § 160D-605 establishes two distinct statutory findings the Board of Commissioners must make when adopting or rejecting this zoning map amendment, and staff sets out the applicable framework below to assist the Board in preparing both. First, under § 160D-605(a), the Board must approve a statement describing whether the action taken is consistent with the comprehensive plan, or, if a written statement is not separately prepared, the minutes of the meeting at which the vote is taken must reflect that the Board was aware of and considered the Planning Board's recommendation, as well as the Board's own consideration of the consistency (or lack thereof) with the applicable adopted plan N.C. Gen. Stat. § 160D-605(a)⁴⁵. Section 4.5 above identifies the specific Vision Plan provisions relevant to that statement.

Second, and separately, § 160D-605(b) requires the Board to approve a statement analyzing the reasonableness of the proposed rezoning, which may consider, among other factors: (i) the size, physical conditions, and other attributes of the area proposed to be rezoned; (ii) the benefits and detriments to the landowners, the neighbors, and the surrounding community; (iii) the relationship between the current actual and permissible development on the tract and adjoining areas and the development that would be permissible under the proposed amendment; (iv) why the action taken is in the public interest; and (v) any changed conditions warranting the amendment N.C. Gen. Stat. § 160D-605(b)⁴⁶. The statute permits the two statements to be combined into a single statement addressing both consistency and reasonableness N.C. Gen. Stat. § 160D-605(c)⁴⁷.

Staff emphasizes that both statements are legal findings committed to the Board of Commissioners, not staff. The statute expressly provides that the Board's consistency statement under § 160D-605(a) is not

⁴³N.C. Gen. Stat. § 160D-605(a) —

https://www.ncleg.gov/EnactedLegislation/Statutes/PDF/BySection/Chapter_160D/GS_160D-605.pdf

⁴⁴N.C. Gen. Stat. § 160D-605(a) —

https://www.ncleg.gov/EnactedLegislation/Statutes/PDF/BySection/Chapter_160D/GS_160D-605.pdf

⁴⁵N.C. Gen. Stat. § 160D-605(a) —

https://www.ncleg.gov/EnactedLegislation/Statutes/PDF/BySection/Chapter_160D/GS_160D-605.pdf

⁴⁶N.C. Gen. Stat. § 160D-605(b) —

https://www.ncleg.gov/EnactedLegislation/Statutes/PDF/BySection/Chapter_160D/GS_160D-605.pdf

⁴⁷N.C. Gen. Stat. § 160D-605(c) —

https://www.ncleg.gov/EnactedLegislation/Statutes/PDF/BySection/Chapter_160D/GS_160D-605.pdf

subject to judicial review N.C. Gen. Stat. § 160D-605(a)⁴⁸. This report's findings and Section 11 (Staff Recommendation) are offered to inform, and not to substitute for, the Board's own findings under § 160D-605(a) and (b).

⁴⁸N.C. Gen. Stat. § 160D-605(a) —

https://www.ncleg.gov/EnactedLegislation/Statutes/PDF/BySection/Chapter_160D/GS_160D-605.pdf

5. Compatibility with Surrounding Uses

5.1 Existing Surrounding Land Uses

As detailed in Section 3.2, staff's independent GIS buffer analysis found that Residential-Agricultural (R-A) zoning is the single largest zoning category surrounding the property, accounting for approximately 73.5 percent of land within one-half mile and approximately 69.4 percent within one mile, and consisting largely of individually-owned family farms and residences along Tuttle Road, Farmer Road, and Baileytown Church Road, together with a large state-owned tract ⁴⁹. At the same time, that same analysis found that industrially-zoned land (M-1, M-1-CZ, and M-2-CU, together with a small acreage carrying the same "I-1" designation described in Section 3.2, reflecting Walnut Cove's extraterritorial zoning jurisdiction rather than a Stokes County Zoning Ordinance district) accounts for approximately 26.1 percent of land within one-half mile and approximately 28.4 percent within one mile — a substantial share concentrated in a small number of large tracts rather than a marginal or incidental presence ⁵⁰. Those tracts include a brick manufacturing facility (Pine Hall Brick, Inc.), agricultural land under lease for solar energy generation (Samuel Wilson Farms of Stokes, LLC), a tract held by RENEWA I, LLC, and the Duke Energy Belews Creek Steam Station, a large coal- and natural-gas-fired electric generating facility, portions of which fall within the one-mile analysis radius ⁵¹. Staff accordingly characterizes the surrounding area as predominantly, but not exclusively, rural residential-agricultural in zoning, with an already-substantial and geographically concentrated industrial and utility-scale energy presence; the Belews Creek Steam Station in particular means the surrounding area already includes a large-scale industrial energy use, which is a relevant factor bearing on the benefits and detriments to the surrounding community under N.C. Gen. Stat. § 160D-605(b)(ii) ⁵².

5.2 Existing Industrial and Utility Uses in the Vicinity

Staff independently verified the following existing industrial, utility, and energy-generation uses in the immediate vicinity of the subject property against current Stokes County GIS parcel and zoning records:

Use / Operator	Location	Zoning	Parcel Acreage
Duke Energy Corporation — Belews Creek Steam Station	Steam Station Rd	M-1	6,011.51 ac
Pine Hall Brick, Inc. (3 parcels)	Hickory Fork Rd / US 311 area	M-2-CU	986.45 ac

⁴⁹Stokes County GIS, County Zoning layer — <https://stokescountygis.com/server/rest/services/AllLayers/MapServer>

⁵⁰Stokes County GIS, County Zoning layer — <https://stokescountygis.com/server/rest/services/AllLayers/MapServer>

⁵¹Stokes County GIS, Parcel layer — <https://stokescountygis.com/server/rest/services/AllLayers/MapServer>

⁵²N.C. Gen. Stat. § 160D-605(b)(ii) — https://www.ncleg.gov/EnactedLegislation/Statutes/PDF/BySection/Chapter_160D/GS_160D-605.pdf

Samuel Wilson Farms of Stokes, LLC (host site of Bear Branch Solar)	1998 Tuttle Rd	M-1 / M-1-CZ	744.57 ac
RENEWA I, LLC	1180 Burton Loop Rd	M-1 / M-1-CZ	430.79 ac
Privately held parcels (4 parcels)	Old Town Rd / Farmer Rd / Ethan Ln area	M-1-CZ	284.87 ac
Total, existing industrial/utility uses identified above			8,458.19 ac

The Duke Energy Belews Creek Steam Station occupies a single tax parcel of 6,011.51 acres carrying a primary M-1 zoning classification in county records, and is the largest existing industrial use in the surrounding area; as with any large tax parcel, portions of its overall boundary may fall within other zoning classifications under the county's official zoning boundary layer, but the parcel's predominant and operative classification for the active industrial use is M-1⁵³. Pine Hall Brick, Inc. operates a brick manufacturing facility on three parcels totaling 986.45 acres, carrying a primary M-2 Conditional Use (M-2-CU) classification in county records⁵⁴. The 744.57-acre Samuel Wilson Farms of Stokes, LLC parcel at 1998 Tuttle Road is the host site for the Bear Branch Solar project, a 35-megawatt solar photovoltaic facility developed by Capital Power Corporation; the North Carolina Department of Environmental Quality approved an erosion and sedimentation control plan for 272 acres of that site under Project ID STOK-2023-011, with construction beginning in 2025 and commercial operation targeted for late 2026 under a 25-year power purchase agreement with Duke Energy Carolinas⁵⁵. The adjoining 430.79-acre tract held by RENEWA I, LLC at 1180 Burton Loop Road is zoned M-1/M-1-CZ and is currently classified as vacant land in county tax records⁵⁶. Staff additionally identified four privately held, non-contiguous parcels totaling approximately 284.87 acres along Old Town Road, Farmer Road, and Ethan Lane — also in Sauratown Township — that the county's parcel-layer attribute table still lists under a legacy R-A designation but that the county's official zoning boundary layer confirms were rezoned to M-1 Conditional Zoning (M-1-CZ) as of October 1, 2019⁵⁷. Because the zoning boundary layer is the authoritative record of a parcel's current zoning classification, staff relies on the M-1-CZ designation for these parcels notwithstanding the outdated attribute value in the parcel layer. Taken together, these five verified industrial and energy-related holdings total approximately 8,458 acres in the immediate surrounding area, reinforcing that the vicinity already includes substantial heavy industrial and utility-scale energy development notwithstanding its predominantly rural residential-agricultural zoning pattern.

⁵³Stokes County GIS, Parcel layer —

<https://stokescountygis.com/server/rest/services/AllLayers/MapServer>

⁵⁴Stokes County GIS, Parcel layer —

<https://stokescountygis.com/server/rest/services/AllLayers/MapServer>

⁵⁵NCDEQ, Division of Energy, Mineral and Land Resources, Letter of Approval (Feb. 17, 2025) —

<https://edocs.deq.nc.gov/Stormwater/DocView.aspx?id=3688658&dbid=0&repo=WaterResources>

⁵⁶Stokes County GIS, Parcel layer —

<https://stokescountygis.com/server/rest/services/AllLayers/MapServer>

⁵⁷Stokes County GIS, County Zoning layer —

<https://stokescountygis.com/server/rest/services/AllLayers/MapServer>

5.3 County-Wide and Quadrant Industrial Zoning Context

To provide broader context for the scale of industrial zoning in Stokes County, staff independently queried the county's official zoning boundary layer for all parcels carrying an industrial zoning classification (M-1, M-1-CU, M-1-CZ, M-2, and M-2-CU, together with the City of King's L-I, L-I-CZ, and H-I municipal industrial designations and the Town of Walnut Cove's "I-1" Light Industrial designation, the latter reflecting Walnut Cove's extraterritorial zoning jurisdiction rather than a Stokes County Zoning Ordinance district)⁵⁸. Under the county's own zoning jurisdiction (areas subject to the Stokes County Zoning Ordinance, as opposed to the municipal zoning jurisdictions of King, Walnut Cove, and Danbury), industrially-zoned land totals approximately **11,164.8 acres** across 122 zoning-district polygons in the county's GIS zoning layer. Including all industrially-zoned land within Stokes County regardless of zoning jurisdiction (county plus the King, Walnut Cove, and Danbury municipal planning jurisdictions) brings the total to approximately **12,592.3 acres** across 342 zoning-district polygons (approximately 261 underlying tax parcels).

The subject property lies within the southeastern quadrant of the county depicted on the attached zoning map (Stokes County GIS map sheet SE-04, dated July 20, 2026). Staff calculated the portion of the county's industrially-zoned acreage that falls within this southeastern quadrant by geometrically clipping each industrially-zoned parcel to the quadrant's boundary (as defined by the map's own graticule: 80°14'30"W to 80°0'30"W, 36°14'30"N to 36°24'30"N) and summing only the clipped area within that boundary, so that parcels straddling the quadrant line are counted only for the portion actually within it. On this basis, approximately **10,628 acres** of the county's industrially-zoned land — roughly 84 percent of the all-jurisdictions county-wide total — lies within the southeastern quadrant, reflecting the concentration of industrial zoning (including the Belews Creek Steam Station, Pine Hall Brick, and the solar-related M-1-CZ tracts) in this part of the county, as shown on the zoning map on the following page⁵⁹.

⁵⁸Stokes County GIS, County Zoning layer — <https://stokescountygis.com/server/rest/services/AllLayers/MapServer>

⁵⁹Stokes County GIS, County Zoning layer — <https://stokescountygis.com/server/rest/services/AllLayers/MapServer>

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5.4 Proposed Mitigation Measures

The application proposes several conditions intended to address compatibility with adjoining residential and agricultural uses. The Applicant proposes a vegetative buffer of 100 feet along the property line generally, increased to 250 feet along boundaries adjacent to residential uses in response to input received at the PIM (Combined Rezoning Package, Public Information Meeting Report, pp. 10-13; Combined Rezoning Package, Statement of Conditions, pp. 3-7). The application also proposes a maximum building height of 80 feet and requires full cutoff, shielded lighting fixtures to limit off-site light spillover (Combined Rezoning Package, Statement of Conditions, pp. 3-7). A 300-foot setback is proposed for on-site power generation equipment (Combined Rezoning Package, Statement of Conditions, pp. 3-7). The application further proposes minimum building setbacks of 40 feet from the right-of-way, 0 feet (or 25 feet where the lot abuts a residential district) at the rear, and 0 feet (or 15 feet where the lot abuts a residential district) at the side (Combined Rezoning Package, Statement of Conditions, pp. 3-7). Staff notes for the Board's benefit that these proposed setback figures are materially the same as, though not in every respect identical to, the base dimensional standard already applicable to any M-2 use under Stokes County Zoning Ordinance §92.4.1. The ordinance's enhanced rear- and side-setback standard applies where a lot "abuts a side yard of a lot zoned residential" or where "the rear of a lot abuts" a residential district, while the application's proposed condition is triggered more broadly whenever the lot "abuts a residential district" — a formulation that could apply in some circumstances the ordinance's own trigger would not reach⁶⁰. Because the proposed numeric standards themselves track the ordinance's existing figures, staff does not view this as a substantive gap. Staff also notes that the building setbacks are not the primary compatibility measure at work here: the proposed 100-foot general buffer, 250-foot residential-adjacent buffer, and 300-foot generator setback discussed above already function as the property's effective setback from adjoining uses, and each of those distances is substantially greater than the base building setbacks required under §92.4.1. Viewed together with those buffers, the application's setback conditions provide protection well beyond what the ordinance's minimum building-setback standard alone would require.

In addition to the conditions described above, staff notes that the floodplain development restriction discussed in Section 4.1 and summarized in Appendix A functions as a further, geographically significant compatibility measure. As discussed in Section 4.1, the approximately 620.5 acres of the property carrying the Vision Plan's Preserved Lands (O-1) designation are more than 99 percent coextensive with the FEMA-mapped Dan River floodplain, and the Applicant's proposed conditions limit development within that floodplain to infrastructure improvements and recreational, agricultural, conservation, preservation, and open space uses^{61, 62}. In practical effect, this restriction keeps approximately one-third of the property's total acreage undeveloped, providing an additional, naturally-occurring buffer and open-space area beyond the vegetative buffers discussed above.

⁶⁰Stokes County Zoning Ordinance, §92.4.1 —

<https://cms9files.revize.com/stokescountync/Planning%20&%20Inspections/Documents/StokesCountyZoningOrdinance26.pdf>

⁶¹Stokes County GIS, Land Use 2035 layer —

<https://stokescountygis.com/server/rest/services/WebApp2026/MapServer/34>

⁶²Stokes County GIS, Flood Zones layer —

<https://stokescountygis.com/server/rest/services/AllLayers/MapServer>

5.5 Public Information Meeting Input on Compatibility

The PIM Report documents that attendees raised concerns regarding the scale of the proposed development relative to surrounding land uses, the nature of the conditional zoning designation, and potential effects on nearby property values (Combined Rezoning Package, Public Information Meeting Report, pp. 10-13). Staff notes that the conditional zoning mechanism, if approved, would limit development of the property specifically to the data center and supporting uses identified in the application, rather than permitting the full range of uses otherwise allowed under a standard M-2 district (Combined Rezoning Package, Statement of Conditions, pp. 3-7).

6. Noise Impact Analysis

6.1 Proposed Noise Standards

The application proposes a maximum A-weighted sound level of 70 dB(A) at the property line adjacent to non-residential uses (Combined Rezoning Package, Statement of Conditions, pp. 3-7). Adjacent to residential uses, the application proposes a lower standard of 60 dB(A) during daytime hours (7:00 a.m. to 10:00 p.m.) and 50 dB(A) during nighttime hours (Combined Rezoning Package, Statement of Conditions, pp. 3-7). In response to concerns raised at the PIM regarding low-frequency and tonal sound, the Applicant added a requirement that the C-weighted sound level (dB(C)), which captures low-frequency noise not fully reflected in A-weighted measurements, not exceed the corresponding A-weighted limit by more than 15 dB, and added a separate tonal-noise penalty provision (Combined Rezoning Package, Statement of Conditions, pp. 3-7; Combined Rezoning Package, Public Information Meeting Report, pp. 10-13).

6.2 Monitoring and Enforcement

The application requires that compliance monitoring, including pre-construction ambient baseline surveys and post-construction compliance surveys, be conducted by a consultant who is INCE Board Certified — a professional personnel credential issued by the Institute of Noise Control Engineering — rather than requiring the measurement protocols themselves to conform to a specific INCE-published measurement standard (Combined Rezoning Package, Statement of Conditions, pp. 3-7). The applicable technical measurement standard for the Leq and L90 sound-level metrics referenced in the application is the American National Standards Institute's ANSI S1.4 standard for sound level meters, which is the industry-standard protocol INCE-certified consultants would be expected to apply in conducting the required surveys⁶³. The PIM Report indicates that attendees specifically raised questions regarding the methods available for monitoring compliance with the proposed noise standards and the enforcement remedies and corrective measures available to the County (Combined Rezoning Package, Public Information Meeting Report, pp. 10-13).

6.3 Baseline Ordinance Performance Standards

Staff notes for the Board's benefit that Stokes County Zoning Ordinance §92.5, adopted July 13, 2026 as part of Amendment P (after the July 8, 2026 PIM but prior to this report), establishes objective operational performance standards that apply to all M-2 and M-2-CZ uses countywide, independent of any conditions specific to this application, and regardless of the zoning classification of the adjacent property. As relevant here, §92.5.1 caps noise at 75 dB(A) measured at any point on or beyond the boundary of the zoning lot, applicable continuously (24 hours a day, 7 days a week), with no separate daytime/nighttime distinction, subject to a limited allowance for intermittent noise of up to 15 dB(A) above the baseline for no more than 10 percent of any measurement period, and exemptions for construction activity, emergency response, and vehicles operating on public rights-of-way; §92.5.6 separately (a) prohibits a direct glare source from any light source, floodlight, welding or cutting operation, furnace, or molten material that is directly visible beyond the property line, with an express carve-out providing that incidental sky-reflected glow that does not itself present a direct glare source is not a violation, (b) requires exterior lighting to be directed downward and inward and prohibits lighting directed into any abutting residential, agricultural,

⁶³ANSI S1.4-2014, American National Standard Specification for Sound Level Meters — <https://webstore.ansi.org/standards/asa/ansis142014>

or commercial district, and (c) prohibits heat emissions that raise ambient air temperature at any adjacent property line by more than 1.8°F (1°C) above ambient. As of the date of this report, the codified, post-amendment text of §92.5 has not yet been posted to the county's publicly available online copy of the Zoning Ordinance; however, the county has posted a staff document reflecting the §92.5 text as presented to and adopted by the Board of Commissioners at its July 13, 2026 meeting ⁶⁴, and this description is based on that document. For a residential property adjoining the site, what matters practically is the noise level at that resident's own property line, not the noise level at some other measurement point. On that basis, the applicant's proposed residential-boundary standard (60 dB(A) day / 50 dB(A) night) is more restrictive than the §92.5.1 baseline of 75 dB(A) applicable at all times, and represents the standard that will actually apply to adjoining residential properties. The applicant's proposed non-residential-boundary standard (70 dB(A), unrestricted by time of day) applies only where the adjoining property is non-residential, and staff notes that it is measured at a different point than §92.5.1: the application measures compliance "at the exterior property line or, if adjoining a public right-of-way, from the nearest property line beyond the right-of-way," whereas §92.5.1 reaches any point on or beyond the boundary of the zoning lot. Because §92.5.1 sets a single 75 dB(A) standard applicable at all hours, with no separate nighttime ceiling, the ordinance does not independently impose a nighttime-specific noise limit on the applicant's non-residential-boundary condition; any nighttime protection at that boundary depends on the applicant's own proposed conditions rather than on a countywide ordinance backstop.

6.4 Staff Observation

The proposed noise conditions, including the addition of a C-weighted limit and tonal penalty after the PIM, and the requirement for monitoring by an INCE Board Certified consultant, are intended to address the specific low-frequency noise characteristics associated with large mechanical cooling equipment used at data center facilities. Because noise conditions of this kind are enforceable zoning conditions rather than a separate permitting requirement, the specificity and measurability of the proposed standards are relevant to the Board's evaluation of whether the conditions are adequate to protect adjacent residential uses.

⁶⁴Stokes County Planning & Inspections, M-2 Heavy Manufacturing District Proposed Operational Performance Standards — https://cms9files.revize.com/stokescountync/Stokes_County_M2_Performance_Standards_Final%20%284%29%20%281%29.pdf

7. Cumulative Water, Wastewater, and Energy Impacts

7.1 Water Supply and Cooling Technology

The application prohibits open-loop water cooling systems and permits only closed-loop cooling, air-cooled systems, liquid cooling systems, or other water-efficient cooling technologies (Combined Rezoning Package, Statement of Conditions, pp. 3-7). The application further prohibits withdrawal of water from on-site or nearby lakes, ponds, reservoirs, groundwater wells, aquifers, or other private surface water or groundwater sources, including the Dan River, as a water source for the facility (Combined Rezoning Package, Statement of Conditions, pp. 3-7). This private-source withdrawal prohibition was added in direct response to concerns raised at the PIM regarding effects on private wells and groundwater supplies (Combined Rezoning Package, Public Information Meeting Report, pp. 10-13). The Applicant has separately indicated, in its PIM narrative response, an intention to connect the facility to public water infrastructure (Combined Rezoning Package, Public Information Meeting Report, pp. 10-13). For the Board's awareness, that public-water commitment appears in the PIM narrative rather than in the binding Statement of Conditions itself; staff accordingly offers, for the Board's consideration, the option of adding an express public-water-connection condition, subject to the Applicant's written consent under N.C. Gen. Stat. § 160D-703(b) as discussed in Section 2.4, should the Board wish to make that commitment directly enforceable.

The Vision Plan states that Stokes County, drawing on the Dan River, the nearby Yadkin River, and groundwater supply, has an adequate water supply to meet county needs into the future, while also noting that the availability of water and sewer service is a major determinant of where growth can occur, given soil limitations on individual septic systems in many areas of the county (Stokes County 2035 Vision Plan, Chapter 7: Infrastructure, pp. 125-129). By prohibiting reliance on private wells or direct surface water withdrawal — and assuming the facility is in practice served by a public water provider, consistent with the Applicant's PIM narrative commitment discussed above — the proposed conditions are structured to avoid the individual-well and septic limitations the Vision Plan identifies as constraints on rural development (Stokes County 2035 Vision Plan, Chapter 7: Infrastructure, pp. 125-129).

7.2 Wastewater

The Vision Plan identifies three existing municipal wastewater systems in the county, located in King, Danbury, and Walnut Cove, and states that existing municipal wastewater infrastructure has capacity to meet the county's foreseeable needs (Stokes County 2035 Vision Plan, Chapter 7: Infrastructure, pp. 125-129). The Vision Plan separately notes that the City of King is considering development of its own wastewater treatment facility due to rising sewer rates charged by the City of Winston-Salem, which serves King's system (Stokes County 2035 Vision Plan, Chapter 7: Infrastructure, pp. 125-129). This dynamic is specific to the City of King's system and is not identified in the Vision Plan as a constraint applicable to the Walnut Cove area where the subject property is located (Stokes County 2035 Vision Plan, Chapter 7: Infrastructure, pp. 125-129).

7.3 Energy and Electric Service

The application addresses on-site power generation through a proposed 300-foot setback for generator equipment and contemplates the use of temporary "bridging" generation pending permanent connection to the electric grid (Combined Rezoning Package, Statement of Conditions, pp. 3-7; Combined Rezoning Package, Public Information Meeting Report, pp. 10-13). The PIM Report documents that attendees raised questions regarding the quantity, capacity, and fuel types of potential generators, the projected power

demand relative to available electric grid capacity, curtailment, and the anticipated timeline for permanent grid connection, as well as concerns regarding the potential effect of data center electric demand on residential electric rates (Combined Rezoning Package, Public Information Meeting Report, pp. 10-13). The subject property directly adjoins the Duke Energy Belews Creek Steam Station property, an existing large-scale electric generating facility, which is a relevant factor regarding proximity to grid infrastructure ⁶⁵.

7.4 Stormwater and Erosion and Sedimentation Control

The subject property lies partially within the mapped Dan River floodplain, as discussed in Sections 3.1 and 4.1 above, and any land-disturbing construction activity associated with the proposed use is subject to state erosion and sedimentation control requirements independent of, and in addition to, this zoning approval. Under the North Carolina Sedimentation Pollution Control Act of 1973 and implementing regulations administered by the North Carolina Department of Environmental Quality's Division of Energy, Mineral and Land Resources ("DEMLR"), a land-disturbing activity that disturbs more than one acre requires an approved Erosion and Sedimentation Control ("E&SC") Plan and coverage under DEMLR's Construction General Stormwater Permit, NCG010000, which NCDEQ renewed effective April 1, 2024 for a cycle running through March 31, 2029 ⁶⁶. Given the scale of the proposed data center campus, staff anticipates that construction activity on the site would exceed the one-acre threshold and would accordingly require an approved E&SC Plan and NCG01 permit coverage from DEMLR prior to the commencement of grading or other land-disturbing construction ⁶⁷.

This state permitting process, which includes review of sediment and erosion control measures, stormwater outlets, and buffers relative to surface waters such as the Dan River, operates independently of the zoning map amendment and would apply regardless of whether the property is zoned R-A or M-2-CZ. Compliance with the E&SC Plan and NCG01 permit conditions would be enforced by DEMLR through its standard inspection and enforcement authority, separate from any zoning conditions or county code enforcement. Staff notes this state-level requirement for the Planning Board's and Board of Commissioners' awareness, as it provides an additional, independent layer of environmental review applicable to any land-disturbing construction on the site.

7.5 Fiscal and Tax Revenue Considerations

The PIM Report reflects that attendees raised questions regarding the tax revenue and broader economic benefit the county could expect from the proposed use (Combined Rezoning Package, Public Information Meeting Report, pp. 10-13). Staff notes that the fiscal and tax revenue implications of this or any rezoning application are analyzed by the County's Finance and Tax Administration offices as part of the county's budgeting and ad valorem tax administration process, and are outside the scope of the Planning and Inspections Department's review under N.C. Gen. Stat. Chapter 160D, which governs the zoning and land use aspects of this application.

⁶⁵Stokes County GIS, Parcel layer —

<https://stokescountygis.com/server/rest/services/AllLayers/MapServer>

⁶⁶NCDEQ DEMLR, NPDES Stormwater Construction General Permit — <https://www.deq.nc.gov/energy-mineral-and-land-resources/stormwater/npdes-general-permits/demlr-npdes-stormwater-construction-general-stormwater-permit/open>

⁶⁷NCDEQ DEMLR, NPDES Stormwater Construction General Permit — <https://www.deq.nc.gov/energy-mineral-and-land-resources/stormwater/npdes-general-permits/demlr-npdes-stormwater-construction-general-stormwater-permit/open>

For general context, staff notes that North Carolina law provides certain state sales and use tax exemptions for qualifying data center support equipment, and, as revised in the 2026-27 state budget, no longer exempts data center electricity purchases from sales and use tax⁶⁸; ⁶⁹. These sales and use tax exemptions and their recent partial repeal pertain to state and local sales tax revenue, which is collected and distributed by the North Carolina Department of Revenue rather than assessed directly by the county N.C. Gen. Stat. § 105-472⁷⁰. Separately, and unless the county were to grant a specific local incentive package providing an abatement, data center facilities and equipment remain subject to local ad valorem (property) taxation in the same manner as other industrial property⁷¹. Staff has not been asked to, and has not, evaluated any incentive request or economic development agreement associated with this application, as no such request has been submitted to Planning staff.

The Applicant separately submitted an illustrative tax revenue estimate prepared by Engineered Land Solutions, LLC, which projects a full-buildout assessed value of approximately \$7.09 billion across an estimated 1,050 developable acres, derived from the average 2025 assessed value per acre reported for three operating North Carolina data center campuses (Apple in Maiden, Google in Lenoir, and Meta in Forest City), and applies that assumed value to a set of ad valorem tax rates to produce an illustrative combined annual tax estimate of approximately \$50.7 million (ELS, "Project Delta Tax Revenue Estimate," 2026). The Applicant's own document characterizes this figure as "illustrative" and "not a tax assessment, appraisal, guaranty, or representation of the actual taxable value of Project Delta," and staff agrees that it should be read strictly as an informational, forward-looking estimate (ELS, "Project Delta Tax Revenue Estimate," 2026).

Staff checked the tax rate inputs used in the Applicant's estimate against current, publicly available rate data. The Applicant's estimate itemizes three rate components applicable to the subject property: a \$0.585 per \$100 Stokes County General Fund rate, a \$0.090 per \$100 Walnut Cove Fire District rate, and a \$0.040 per \$100 Dedicated Education Fund rate, for a combined effective rate of \$0.715 per \$100 of assessed value (ELS, "Project Delta Tax Revenue Estimate," 2026). Staff confirms that the Applicant's \$0.585 and \$0.040 components together equal \$0.625 per \$100, matching the North Carolina Department of Revenue's published Stokes County FY 2025-26 county tax rate⁷². Staff also notes that the Applicant's \$7.09 billion full-buildout assessed-value assumption is based on comparable data center assessments in other counties (Catawba, Caldwell, and Rutherford), which staff has not independently verified, so that figure and the resulting revenue estimates should be treated as the developer's own projection rather than a confirmed county figure.

⁶⁸Session Law 2026-41, § 44.4 — <https://www.ncleg.gov/EnactedLegislation/SessionLaws/HTML/2025-2026/SL2026-41.html>

⁶⁹Carolina Journal, "NC budget scales back data center tax break" (July 8, 2026) — <https://www.carolinajournal.com/nc-budget-scales-back-data-center-tax-break/>

⁷⁰N.C. Gen. Stat. § 105-472 — https://www.ncleg.gov/enactedlegislation/statutes/html/bysection/chapter_105/gs_105-472.html

⁷¹Virginia Public Media, "Data centers in NC don't pay taxes on their supplies or..." (May 11, 2026) — <https://www.vpm.org/news/2026-05-11/nc-newsroom-data-center-supply-energy-tax-breaks-north-carolina>

⁷²NCDOR, 2025-2026 County Tax Rates — <https://www.ncdor.gov/2025-2026-county-tax-rates-finalpdf/open>

7.6 Cumulative Impact Considerations

Because the application's proposed water and cooling conditions eliminate reliance on groundwater, private wells, and direct surface-water withdrawal, and the Applicant's PIM narrative separately commits to connection to public water infrastructure (as discussed in Section 7.1), the water-related cumulative impact of the proposed use is substantially dependent on the capacity of the relevant public water provider to serve the site, a matter appropriately confirmed through the county's utility extension and capacity review process rather than through the zoning conditions alone. Based on Planning staff's direct communication and coordination with the Stokes County Water Authority and the Town of Walnut Cove in connection with this application, both entities have indicated that they have available water capacity and are willing to provide water service to the proposed project, with the shared understanding that the developer would participate in the cost of any infrastructure improvements necessary to provide such service. Staff notes that this understanding reflects preliminary coordination rather than an executed utility extension agreement, and that any final water service commitment, including the scope of infrastructure improvements and the developer's cost-participation obligations, would be memorialized through a separate utility extension agreement between the developer and the applicable water provider(s), subject to those entities' own governing boards and standard utility extension policies. Energy demand and grid capacity are similarly matters that will be addressed through the applicable utility interconnection process independent of the zoning approval, though the zoning conditions establish enforceable limits on temporary on-site generation pending permanent interconnection.

8. Environmental Justice Considerations

8.1 Demographic Context

To evaluate environmental justice considerations associated with the proposed rezoning, staff reviewed the North Carolina Department of Environmental Quality's environmental justice demographic analysis prepared in connection with the adjoining Duke Energy Belews Creek Steam Station, which used a two-mile radius centered on that facility and reported data for Census Tracts 701 and 707 in Stokes County⁷³. Because the Belews Creek Steam Station directly adjoins the subject property, these census tracts overlap the area surrounding the Project Delta site and provide a relevant, independently-prepared point of reference^{74, 75}.

That report found Census Tract 701 had a total population of 6,720, of which 91.3 percent identified as White and 3.8 percent as Black or African American, with 7.4 percent of the population below the federal poverty level⁷⁶. Census Tract 707 had a total population of 5,681, of which 77.2 percent identified as White and 18.3 percent as Black or African American, with 20.0 percent of the population below the federal poverty level⁷⁷. By comparison, Stokes County as a whole has a poverty rate of approximately 11.8 percent (2024 Small Area Income and Poverty Estimates) and a White alone population share of approximately 92.9 percent, according to the U.S. Census Bureau^{78, 79}. Staff notes that this county-wide figure is distinct from, and should not be confused with, the older 2021 Census Tract 701 figure of 91.3 percent White discussed above, which reflects a different, smaller geography from an earlier data year. Census Tract 707's poverty rate is notably higher than both the county average and Census Tract 701, which staff notes as a relevant environmental justice indicator for this area^{80, 81}. The map below shows the boundaries of Census Tracts 701 and 707 as they existed at the time of the NCDEQ report relative to

⁷³NCDEQ Belews Creek Steam Station Draft Environmental Justice Report (May 2021) — https://files.nc.gov/ncdeq/Air%20Quality/permits/2021_public_notice_documents/environmental_justice/Belews-Creek-Draft-EJ-Report-May-2021.pdf

⁷⁴NCDEQ Belews Creek Steam Station Draft Environmental Justice Report (May 2021) — https://files.nc.gov/ncdeq/Air%20Quality/permits/2021_public_notice_documents/environmental_justice/Belews-Creek-Draft-EJ-Report-May-2021.pdf

⁷⁵Stokes County GIS, Parcel layer — <https://stokescountygis.com/server/rest/services/AllLayers/MapServer>

⁷⁶NCDEQ Belews Creek Steam Station Draft Environmental Justice Report (May 2021) — https://files.nc.gov/ncdeq/Air%20Quality/permits/2021_public_notice_documents/environmental_justice/Belews-Creek-Draft-EJ-Report-May-2021.pdf

⁷⁷NCDEQ Belews Creek Steam Station Draft Environmental Justice Report (May 2021) — https://files.nc.gov/ncdeq/Air%20Quality/permits/2021_public_notice_documents/environmental_justice/Belews-Creek-Draft-EJ-Report-May-2021.pdf

⁷⁸U.S. Census Bureau, Small Area Income and Poverty Estimates (SAIPE), 2024 — <https://www.census.gov/data/datasets/2024/demo/saipe/2024-state-and-county.html>

⁷⁹U.S. Census Bureau QuickFacts, Stokes County, North Carolina — <https://www.census.gov/quickfacts/fact/table/stokescountynorthcarolina/SBO050222>

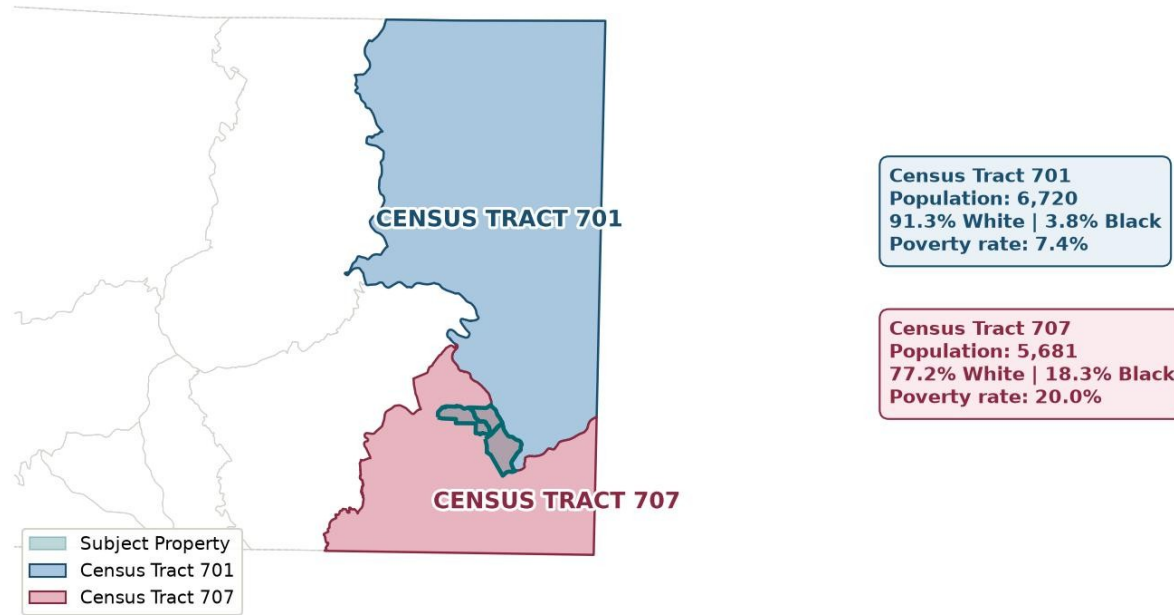
⁸⁰NCDEQ Belews Creek Steam Station Draft Environmental Justice Report (May 2021) — https://files.nc.gov/ncdeq/Air%20Quality/permits/2021_public_notice_documents/environmental_justice/Belews-Creek-Draft-EJ-Report-May-2021.pdf

⁸¹U.S. Census Bureau QuickFacts, Stokes County, North Carolina — <https://www.census.gov/quickfacts/fact/table/stokescountynorthcarolina/SBO050222>

the subject property; staff notes for completeness that the U.S. Census Bureau redrew Stokes County's tract boundaries following the 2020 Census, splitting former Tract 701 into current Tracts 701.01 and 701.02 and former Tract 707 into current Tracts 707.01 and 707.02, with the subject property now falling within current Tract 707.02 ⁸². This boundary change does not affect the substance of the NCDEQ's 2021 findings discussed above, which staff cites using the tract geography and figures as reported in the original NCDEQ analysis.

⁸²U.S. Census Bureau, TIGER/Line Shapefiles — <https://www.census.gov/geographies/mapping-files/time-series/geo/tiger-line-file.html>

Census Tracts 701 and 707, Stokes County, North Carolina



Source: U.S. Census Bureau TIGER/Line 2019 Tract Boundaries; NCDEQ Belews Creek Steam Station Draft Environmental Justice Report (May 2021)

Census Tracts 701 and 707, Stokes County, North Carolina, relative to the subject property, using pre-2020 tract boundaries as they existed at the time of the NCDEQ's May 2021 environmental justice analysis. Note: these tracts were subsequently subdivided following the 2020 Census into current Tracts 701.01/701.02 and 707.01/707.02; the subject property now falls within current Tract 707.02. This map is retained to show the boundaries underlying the NCDEQ data discussed in the text and does not reflect current (post-2020) tract lines.

8.2 Community Health Indicators

To further inform the environmental justice analysis, staff independently queried the CDC's PLACES public health dataset, which provides model-based estimates of chronic disease prevalence and health-related social needs derived from the Behavioral Risk Factor Surveillance System and the American Community Survey⁸³. PLACES does not publish estimates for arbitrary custom radii such as a one-mile ring; its smallest published geography is the individual census tract. Staff therefore identified the current (2020 Census boundary) tract that contains the subject property — Census Tract 070702, as confirmed using the property's coordinates against the Federal Communications Commission's census block lookup tool — and queried PLACES for that tract directly, rather than relying on the larger, now-outdated 2019-boundary tracts referenced in the NCDEQ report discussed in Section 8.1 above^{84, 85}.

Tract 070702, which has a total population of 2,556, shows several health indicators elevated relative to the Stokes County average^{86, 87}. Diagnosed diabetes among adults is estimated at 16.5 percent in Tract 070702, compared with 13.2 percent countywide^{88, 89}. Food insecurity in the past twelve months is estimated at 19.9 percent in the tract, compared with 13.4 percent countywide^{90, 91}. Current asthma among adults is estimated at 11.8 percent in the tract, compared with 10.9 percent countywide, and chronic obstructive pulmonary disease (COPD) is estimated at 10.7 percent in the tract, compared with 9.4 percent countywide^{92, 93}.

All PLACES figures cited above are crude prevalence estimates among adults and, like all small-area PLACES estimates, are model-based with associated confidence intervals rather than direct counts; they are not diagnoses tied to any specific facility or use and do not by themselves establish causation between any existing or proposed land use and community health outcomes⁹⁴. Staff nonetheless notes that a population with elevated rates of chronic respiratory and metabolic conditions, and with a higher rate of

⁸³CDC PLACES: Local Data for Better Health, 2025 release —

<https://data.cdc.gov/500-Cities-Places/PLACES-Local-Data-for-Better-Health-Census-Tract-D/cwsq-ngmh>

⁸⁴FCC Census Block Conversions API — <https://geo.fcc.gov/api/census/>

⁸⁵CDC PLACES: Local Data for Better Health, 2025 release —

<https://data.cdc.gov/500-Cities-Places/PLACES-Local-Data-for-Better-Health-Census-Tract-D/cwsq-ngmh>

⁸⁶CDC PLACES: Local Data for Better Health, 2025 release —

<https://data.cdc.gov/500-Cities-Places/PLACES-Local-Data-for-Better-Health-Census-Tract-D/cwsq-ngmh>

⁸⁷CDC PLACES: Local Data for Better Health, County Data 2025 release — <https://data.cdc.gov/500-Cities-Places/PLACES-Local-Data-for-Better-Health-County-Data-20/swc5-unth>

⁸⁸CDC PLACES: Local Data for Better Health, 2025 release —

<https://data.cdc.gov/500-Cities-Places/PLACES-Local-Data-for-Better-Health-Census-Tract-D/cwsq-ngmh>

⁸⁹CDC PLACES: Local Data for Better Health, County Data 2025 release — <https://data.cdc.gov/500-Cities-Places/PLACES-Local-Data-for-Better-Health-County-Data-20/swc5-unth>

⁹⁰CDC PLACES: Local Data for Better Health, 2025 release —

<https://data.cdc.gov/500-Cities-Places/PLACES-Local-Data-for-Better-Health-Census-Tract-D/cwsq-ngmh>

⁹¹CDC PLACES: Local Data for Better Health, County Data 2025 release — <https://data.cdc.gov/500-Cities-Places/PLACES-Local-Data-for-Better-Health-County-Data-20/swc5-unth>

⁹²CDC PLACES: Local Data for Better Health, 2025 release —

<https://data.cdc.gov/500-Cities-Places/PLACES-Local-Data-for-Better-Health-Census-Tract-D/cwsq-ngmh>

⁹³CDC PLACES: Local Data for Better Health, County Data 2025 release — <https://data.cdc.gov/500-Cities-Places/PLACES-Local-Data-for-Better-Health-County-Data-20/swc5-unth>

food insecurity than the county as a whole, may be more sensitive to potential noise, air-quality, or water-quality impacts than a lower-risk population, reinforcing the importance of the enforceable buffer, noise, lighting, and water-quality conditions discussed in Sections 5 through 7 above.

8.3 Sensitive Receptors

The NCDEQ report identified a number of sensitive receptors within its two-mile study radius, including Pine Hall Elementary School (since closed — the Stokes County Board of Education closed Pine Hall Elementary at the end of the 2023-24 school year and declared the property surplus in 2025), the Stokes-Rockingham Volunteer Fire & Rescue station, and multiple churches, including Dry Hollow Church, Rock Hill Church, Mount Carmel United Methodist Church, Withers Chapel United Methodist Church, Forest Chapel United Methodist Church, Pine Hall Baptist Church, Pine Hall Presbyterian Church, and Cornerstone Baptist Church⁹⁵. Staff's independent review of the Stokes County GIS parcel layer separately identified Sycamore Baptist Church within approximately 670 feet of the subject property, as discussed in Section 3.2 above⁹⁶. The presence of these institutional and residential receptors in the surrounding area underscores the importance of the enforceable buffer, noise, lighting, and water-quality conditions proposed in the application, discussed in Sections 5 through 7 above.

8.4 Community Engagement

The PIM held on July 8, 2026, provided an opportunity for members of the surrounding community, including residents of the lower-income census tracts identified above, to raise concerns directly with the Applicant (Combined Rezoning Package, Public Information Meeting Report, pp. 10-13). As discussed in Section 6 and Section 7, several of the conditions ultimately proposed in the application, including the increased residential buffer, the stricter noise standard, and the prohibition on groundwater and well-water use, were adopted specifically in response to concerns raised at that meeting (Combined Rezoning Package, Public Information Meeting Report, pp. 10-13). Staff notes that continued opportunities for public input, including the Planning Board and Board of Commissioners hearings on this application, remain available to residents of the surrounding area.

⁹⁴CDC PLACES: Local Data for Better Health, 2025 release —

<https://data.cdc.gov/500-Cities-Places/PLACES-Local-Data-for-Better-Health-Census-Tract-D/cwsq-ngmh>

⁹⁵NCDEQ Belews Creek Steam Station Draft Environmental Justice Report (May 2021) —

https://files.nc.gov/ncdeq/Air%20Quality/permits/2021_public_notice_documents/environmental_justice/Belews-Creek-Draft-EJ-Report-May-2021.pdf

⁹⁶Stokes County GIS, Parcel layer —

<https://stokescountygis.com/server/rest/services/AllLayers/MapServer>

9. Cultural and Historical Resources

9.1 Documented Historic Resources on the Property

Staff independently reviewed the North Carolina State Historic Preservation Office's ("NC HPO") architectural survey inventory using the agency's public GIS mapping tool and confirmed that a documented historic resource, the Hairston Sauratown Plantation House (NC HPO Survey Site SK0182), is located within the boundary of one of the four subject parcels (PIN 6964-91-8321) ⁹⁷. This resource is included on the NC HPO's Study List, a designation indicating the property has been identified as a candidate for further evaluation of National Register eligibility ⁹⁸. The 1989 Stokes County architectural survey describes the surviving house (constructed circa 1870) as one of the most sophisticated dwellings of its period in the county and a notable expression of late nineteenth-century architectural romanticism, built after an earlier plantation house on the opposite side of the Dan River was lost to fire ⁹⁹. The same survey and staff's independent GIS review also identified two additional surveyed sites associated with the same historic family, both since demolished, within the boundary of a second subject parcel (PIN 6973-73-4188) ¹⁰⁰.

None of these three sites is currently listed on the National Register of Historic Places, and staff's review did not identify any National Register-listed property, locally designated landmark, or historic district boundary intersecting the subject property ¹⁰¹. Several additional surveyed historic houses are located within approximately one mile of the property but outside its boundaries ¹⁰².

9.2 Broader Cultural Context of the Dan River Valley

The Dan River valley in southeastern Stokes County is documented in published archaeological literature as the location of Sara (also recorded as Saura or Sauratown) Indigenous village occupation dating to the sixteenth through early eighteenth centuries, most extensively studied at the Upper Saratown site excavated by the University of North Carolina's Research Laboratories of Anthropology beginning in 1972 ¹⁰³. The precise locations of archaeological sites, including any associated with this occupation, are not published in publicly available geographic information systems and are subject to statutory confidentiality protections administered by the North Carolina Office of State Archaeology; staff's review accordingly confirms the documented historical presence of this occupation in the Dan River valley area of the county

⁹⁷NC HPO Historic Resources GIS, Site SK0182 —

<https://www.hpo.nc.gov/survey-and-national-register/gis-maps-and-data>

⁹⁸NC HPO Historic Resources GIS, Site SK0182 —

<https://www.hpo.nc.gov/survey-and-national-register/gis-maps-and-data>

⁹⁹NC HPO, Stokes County Historic Inventory (1989) — https://files.nc.gov/ncdcr/historic-preservation-office/survey-and-national-register/surveyreports/Stokes_CountySurvey-1989.pdf

¹⁰⁰NC HPO Historic Resources GIS, Sites SK0180, SK0181 — <https://www.hpo.nc.gov/survey-and-national-register/gis-maps-and-data>

¹⁰¹NC HPO Historic Resources GIS — <https://www.hpo.nc.gov/survey-and-national-register/gis-maps-and-data>

¹⁰²NC HPO Historic Resources GIS — <https://www.hpo.nc.gov/survey-and-national-register/gis-maps-and-data>

¹⁰³UNC Research Laboratories of Anthropology, Upper Saratown / Ancient North Carolinians — <https://ancientnc.web.unc.edu/indian-heritage/by-region/north-central-piedmont/upper-saratown/>

generally, without asserting that a specific archaeological site boundary has been confirmed to intersect the subject property ¹⁰⁴.

9.3 Cemetery Resources

Staff's independent review of the Stokes County GIS Cemetery Points layer identified a mapped cemetery, recorded with 65 grave points and no name value in the layer's associated attribute field, located inside the boundary of subject parcel PIN 6964-91-8321 ¹⁰⁵. Staff notes that the county's Cemetery Points layer is a planning-level dataset intended to flag the general presence and approximate location of known burial grounds, and that it does not represent a surveyed cemetery boundary; the actual extent of the burial ground may extend beyond the single mapped point location and would need to be confirmed by a ground survey prior to any ground-disturbing activity in its vicinity. Staff discloses this finding for the Board's and the public's awareness, and notes that any ground-disturbing activity in its vicinity remains subject to existing state cemetery and archaeological protection requirements, as discussed in Section 9.4 below.

9.4 Applicant Coordination and Proposed Protections

The PIM Report confirms that attendees raised, and the Applicant addressed, questions regarding the presence of cultural resources and artifacts on the property, applicable state and federal review and reporting requirements, coordination with the State Historic Preservation Office, and the procedures that would apply if resources were encountered before or during construction (Combined Rezoning Package, Public Information Meeting Report, pp. 10-13). The application's floodplain provisions restrict development within the mapped Dan River floodplain to infrastructure, recreation, agricultural, and conservation uses, which has the effect of limiting ground-disturbing construction activity within the low-lying areas nearest the river (Combined Rezoning Package, Statement of Conditions, pp. 3-7). Staff notes that the mapped cemetery identified in Section 9.3 and any other inadvertently discovered human remains or burial grounds are independently protected by existing state law regardless of any zoning condition, under N.C. Gen. Stat. § 70-29¹⁰⁶ (mandatory cessation of activity and notification upon discovery of human remains) and N.C. Gen. Stat. § 65-106¹⁰⁷ (county consent and notice requirements for removal of a grave). By contrast, coordination with the NC HPO regarding the documented SK0182 site is not independently mandated by state law in this instance: N.C. Gen. Stat. § 121-12(a) applies only to State agencies undertaking or funding/licensing a State or state-assisted undertaking affecting properties listed on the National Register of Historic Places, and SK0182 is a privately developed property that remains Study List only, not National Register-listed, with no identified State funding or permitting nexus for this project N.C. Gen. Stat. § 121-12¹⁰⁸. Such coordination, while good practice and encouraged by staff, would be voluntary absent a future federal or state funding or permitting trigger or a change in SK0182's National Register status.

¹⁰⁴North Carolina Office of State Archaeology, Archaeological Site Files Program —

<https://archaeology.ncdcr.gov/programs/archsitefiles>

¹⁰⁵Stokes County GIS, Cemetery Points layer —

<https://stokescountygis.com/server/rest/services/WebApp2026/MapServer/0>

¹⁰⁶N.C. Gen. Stat. § 70-29 —

https://www.ncleg.gov/EnactedLegislation/Statutes/PDF/BySection/Chapter_70/GS_70-29.pdf

¹⁰⁷N.C. Gen. Stat. § 65-106 —

https://www.ncleg.gov/EnactedLegislation/Statutes/PDF/BySection/Chapter_65/GS_65-106.pdf

¹⁰⁸N.C. Gen. Stat. § 121-12 —

https://www.ncleg.gov/EnactedLegislation/Statutes/PDF/BySection/Chapter_121/GS_121-12.pdf

10. Infrastructure Capacity

10.1 Roads

The property has direct frontage on US Highway 311, a state-maintained highway, as well as Tuttle Road, Oldtown Road, and Coon Joyce Road (Combined Rezoning Package, Application Cover Sheet, p. 8). Staff's independent review of the Stokes County GIS road centerline layer additionally identified Fulp Road (SR 1719) and Saura Farm Road as abutting portions of the subject property not fronting on the four roads named in the application ¹⁰⁹. The Vision Plan's Transportation chapter identifies coordination with the North Carolina Department of Transportation on regional transportation planning as an ongoing county policy and identifies US 311 as a significant corridor within the county's highway network (Stokes County 2035 Vision Plan, Chapter 6: Transportation, pp. 117-124). Any driveway permit, turn-lane, or access modifications associated with the proposed development would be subject to separate review and approval by the North Carolina Department of Transportation.

10.2 Water and Wastewater

As discussed in Section 7, the binding Statement of Conditions prohibits the facility from drawing water from private wells or direct surface water withdrawal, but does not itself contain an affirmative requirement that the facility be served by a public water provider; that commitment appears only in the Applicant's non-binding PIM narrative response (Combined Rezoning Package, Statement of Conditions, pp. 3-7; Combined Rezoning Package, Public Information Meeting Report, pp. 10-13). If the Board wishes to make public water service a binding requirement, staff recommends an express condition to that effect, subject to the Applicant's written consent. Confirmation of the specific public water provider's capacity to serve the site, and any water line extension required to do so, is a matter for the applicable utility extension review process, separate from the zoning approval itself.

10.3 Emergency Services

The PIM Report documents that attendees raised questions specifically regarding fire, safety, and emergency response, including safety concerns related to generators, fuel storage, and electrical equipment, applicable inspection and code requirements, and fire suppression systems (Combined Rezoning Package, Public Information Meeting Report, pp. 10-13). Staff's independent review of the Stokes County GIS Fire District layer confirms that approximately 1,827 of the property's approximately 1,828 total acres (using the GIS calculated/geometric acreage established in Section 3.1) — approximately 99.9 percent — lie within the Southeastern fire district, served by Station 35 (Walnut Cove Fire) ¹¹⁰. Compliance with the North Carolina State Building Code and Fire Code, administered through the County's separate building permit and inspection process, would apply to any construction on the site independent of this zoning approval.

10.4 Schools and Parks

Because the proposed use is a non-residential industrial use rather than a residential development, it is not expected to generate a school-age population and therefore does not have a direct impact on Stokes

¹⁰⁹Stokes County GIS, Road Centerlines layer —

<https://stokescountygis.com/server/rest/services/AllLayers/MapServer>

¹¹⁰Stokes County GIS, Fire Districts layer —

<https://stokescountygis.com/server/rest/services/AllLayers/MapServer>

County Schools' facility capacity. The property is not located within, and does not adjoin, any county park or recreational facility identified in the Vision Plan's Recreation chapter (Stokes County 2035 Vision Plan, Chapter 5: Recreation, pp. 111-116). Staff notes for the Board's balanced consideration that the property directly adjoins the approximately 848-acre Dan River Educational State Forest, sharing approximately 1.25 miles of common boundary; this state forest is not identified in the Vision Plan because the state acquired the property in 2023, after the Vision Plan's 2015 adoption, and it is not a county park or recreational facility ¹¹¹.

¹¹¹NC Forest Service, Dan River Educational State Forest — https://www.ncforestservice.gov/ednc/dan_river.html

11. Staff Recommendation

Staff has independently reviewed the application materials, the Stokes County 2035 Vision Plan, applicable provisions of N.C. Gen. Stat. Chapter 160D, and available county geographic information system and public records, and presents the findings above for the Planning Board's consideration under N.C. Gen. Stat. § 160D-604 and for the Board of Commissioners' subsequent findings under N.C. Gen. Stat. § 160D-605.

Consistent with N.C. Gen. Stat. § 160D-605(b), which directs the Board to consider, among other things, the benefits and detriments to the landowners, the neighbors, and the surrounding community, staff notes the following factors relevant to the reasonableness of the proposed rezoning. On the benefit side: the size of the property (approximately 1,848.74 acres) and its frontage on a major highway corridor; the presence of existing industrial and utility uses in the immediate vicinity, including the adjoining Belews Creek Steam Station; the enforceable development conditions proposed by the Applicant addressing noise, lighting, height, buffers, water use, and floodplain protection, several of which were strengthened in direct response to public input received at the PIM; and the Vision Plan's identification of business recruitment and available industrial land as a county economic development priority. On the detriment side, and as discussed more fully in Sections 6 through 8 above, the Board should also weigh: the property's general rural land use designation under the Vision Plan's Land Use Framework Map, which does not identify this property as a targeted industrial site; the presence of numerous churches, residences, and other sensitive receptors within one mile of the property; the differing noise-measurement point for the applicant's proposed non-residential noise standard discussed in Section 6.3; the surrounding area's environmental justice profile, as discussed in Section 8; and the presence of a mapped cemetery within the subject property's boundary and the property's adjacency to the Dan River Educational State Forest, both discussed in Sections 9 and 10 above. These benefit- and detriment-side considerations are offered to inform, not substitute for, the Board's own findings under N.C. Gen. Stat. § 160D-605(b)¹¹². Staff further notes, as discussed in Sections 4.1 and 5.4 above, that the floodplain development restriction proposed by the Applicant is more than 99 percent coextensive with the Vision Plan's Preserved Lands (O-1) designation on the property, such that the enforceable conditions proposed would keep approximately one-third of the property's total acreage undeveloped and in a condition consistent with the Vision Plan's preservation intent for that designation.

Applying the reasonableness factors set out in N.C. Gen. Stat. § 160D-605(b)¹¹³ to the considerations above — including the size and attributes of the property, the benefits and detriments identified, the relationship between the property's current and proposed permissible development and that of the surrounding area, and the changed conditions (including the enforceable conditions added following the PIM) warranting the amendment — staff recommends approval of this application as being reasonable and in the public interest. Regardless of whether the Planning Board or Board of Commissioners finds the proposed rezoning consistent or inconsistent with the Vision Plan, that approval should rest on the enforceable conditions proposed by the Applicant, together with any additional conditions either board considers reasonable and necessary to protect the residents of Stokes County, consistent with the statutory purpose of zoning regulations to promote the public health, safety, and general welfare, as set out in N.C. Gen.

¹¹²N.C. Gen. Stat. § 160D-605(b) —

https://www.ncleg.gov/EnactedLegislation/Statutes/PDF/BySection/Chapter_160D/GS_160D-605.pdf

¹¹³N.C. Gen. Stat. § 160D-605(b) —

https://www.ncleg.gov/EnactedLegislation/Statutes/PDF/BySection/Chapter_160D/GS_160D-605.pdf

Stat. § 160D-701¹¹⁴. Because this application is a conditional zoning district request, any additional condition proposed by either board beyond those already offered by the Applicant would require the Applicant's written consent to become part of an approved conditional zoning district, as discussed in Section 2.4 above, consistent with N.C. Gen. Stat. § 160D-703(b)¹¹⁵.

¹¹⁴N.C. Gen. Stat. § 160D-701 — https://www.ncleg.gov/EnactedLegislation/Statutes/PDF/BySection/Chapter_160D/GS_160D-701.pdf

¹¹⁵N.C. Gen. Stat. § 160D-703(b) — https://www.ncleg.gov/EnactedLegislation/Statutes/PDF/BySection/Chapter_160D/GS_160D-703.pdf

Appendix A: Summary of Proposed Zoning Conditions

The following table summarizes the zoning conditions proposed by the Applicant as part of the Statement of Conditions accompanying the application (Combined Rezoning Package, Statement of Conditions, pp. 3-7). This summary is provided for convenience; the full text of each condition, including definitions and measurement protocols, is set out in the Statement of Conditions itself and governs in the event of any inconsistency.

Condition	Summary
1. Permitted Uses	Limited to a data center facility/campus and directly associated accessory uses (power generation, substations, electrical and natural gas infrastructure, fiber optic infrastructure, battery backup, security facilities, on-site maintenance, container storage, fuel and water storage).
2. Noise	70 dB(A) at the property line adjacent to non-residential zoning; 60 dB(A) daytime (7:00 a.m.-10:00 p.m.) and 50 dB(A) nighttime adjacent to residential zoning. C-weighted sound level (dB(C)) may not exceed the corresponding A-weighted limit by more than 15 dB. Separate tonal-noise penalty (noise limit reduced by 5 dB(A) if a tone is present, as defined by one-third octave band criteria). Generator testing limited to weekdays 9:00 a.m.-5:00 p.m. Pre-construction ambient baseline survey and modeling study, and post-construction compliance survey, required for each Major Improvement, performed by an INCE Board-Certified third-party consultant.
3. Power Generators	Not permitted within 300 feet of the exterior property boundary.
4. Cooling Systems and Water Infrastructure	Open-loop water cooling prohibited; closed-loop, air-cooled, liquid cooling, or other water-efficient systems permitted. Direct withdrawal from streams, rivers, lakes, ponds, reservoirs, groundwater wells, aquifers, or other private surface water or groundwater sources prohibited.
5. Floodplain	Within FEMA FIRM-designated floodplain areas (Panels 3710696200K and 3710696400K, effective June 10, 2026), development limited to infrastructure improvements and recreational, agricultural, conservation, preservation, and open space uses.
6. Lighting	All exterior site and building lighting directed downward, using full cutoff or fully shielded fixtures designed to prevent glare, spillover, or direct illumination onto adjacent properties.
7. Height	Maximum height of principal building(s) is 80 feet; antennas, communication equipment, mechanical equipment, screening, utility infrastructure, and similar appurtenances may extend above this limit.
8. Buffer Areas	Vegetative buffers per the Buffer Zone Exhibit, achieved through existing vegetation, supplemental plantings, berms, or comparable measures; baseline 100-foot buffer increased to 250 feet adjacent to residential uses following PIM input. Minor infrastructure encroachments (utilities, fences, access drives, signage, etc.) permitted where designed to minimize disturbance to vegetation.

9. Minimum Setbacks	Right-of-way/front: 40 feet. Rear: 0 feet, or 25 feet where the lot abuts a residential district. Side: 0 feet, or 15 feet where the lot abuts a residential district; where a non-required side yard is provided, it must be at least 8 feet.
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Appendix B: Public Information Meeting Topics Summary

The PIM Report identifies the following seventeen topic areas discussed at the July 8, 2026 Public Information Meeting (Combined Rezoning Package, Public Information Meeting Report, Section 4, pp. 10-13):

1. **Project structure and ownership** — anticipated ownership and operational structure; potential conveyance to an end user; continued enforceability of zoning conditions following any transfer of ownership or operator.
2. **Conditional zoning and project scale** — overall size of the request; coordination of phased development; surrounding land uses; how conditional zoning would limit development to data center and supporting uses.
3. **Floodplain protection** — rationale for including floodplain areas in the rezoning request; limitations on development within those areas; treatment of fill, elevation changes, and off-site mitigation credits.
4. **Cultural, historical, and archaeological resources** — presence of cultural resources and artifacts on the property; applicable state and federal review requirements; coordination with the State Historic Preservation Office; procedures if resources are encountered during construction.
5. **Noise** — continuous operational noise; low-frequency and tonal sound; adequacy of proposed noise limits and ambient-noise study; noise from on-site and temporary generation; effects on residents and wildlife; effectiveness of buffers, berms, and setbacks.
6. **Noise enforcement and penalties** — monitoring methods; resources for reviewing compliance; available enforcement remedies and corrective measures.
7. **Power and generation** — use and duration of on-site and temporary "bridging" generation; generator quantity, capacity, and fuel types; projected power demand relative to available capacity; curtailment; grid connection timeline.
8. **Electric rates** — concern that data center growth could contribute to residential electric rate increases; the utility's position on data centers as customers.
9. **Water** — limiting impacts on groundwater and private wells; water source, supply, and volume; cooling technology; wastewater discharge; handling and regulatory oversight of cooling system chemicals.
10. **Air quality and emissions** — emissions from backup or temporary generation; heat from combustion; potential cumulative air quality impacts; applicable permitting and regulatory oversight.
11. **Light and site appearance** — light pollution and prevention measures; building height; buffers and setbacks near residential areas; general site appearance.
12. **Fire, safety, and emergency response** — safety concerns related to generators, fuel storage, and electrical equipment; inspection and code requirements; fire suppression systems.
13. **Property values** — potential effect on nearby property values.

14. **Tax revenue and economic benefit** — basis and methodology for projected tax revenue; timeline for realizing estimated revenue; effect of state legislation on distribution of data center tax revenue between the State and the County; potential benefits to the County and residents.
15. **Enforceability of commitments** — enforceability of the Applicant's verbal or written commitments; how approved conditions would bind future owners and operators; role of lenders and insurers in compliance.
16. **Public notice and community process** — adequacy of public notice and project awareness; procedural reasons for the repeated rezoning.
17. **Broader concerns** — matters extending beyond the rezoning itself, including the cumulative effect of data centers and AI generally, coordination with other nearby energy infrastructure, and general concerns regarding zoning versus permitting regulation.

Appendix C: Referenced Maps and Geographic Data Sources

The following publicly available maps and geographic information system (GIS) resources were used by staff in the preparation of this report and may be consulted directly for additional detail:

1. **Stokes County GIS — Parcel, Zoning, Parks, and Structures layers.** Used to independently verify parcel boundaries, current zoning classifications, surrounding land uses, and nearby sensitive receptors. Available at: ¹¹⁶.
2. **FEMA Flood Map Service Center.** Used to independently confirm the effective date of the Flood Insurance Rate Map panels (3710696200K and 3710696400K) applicable to the subject property. Available at: ¹¹⁷.
3. **NC Historic Preservation Office GIS Maps and Data (HPOWEB).** Used to independently confirm the location of documented historic architectural survey sites (SK0180, SK0181, SK0182) relative to the subject parcels. Available at: ¹¹⁸.
4. **Buffer Zone Exhibit.** A site-specific exhibit depicting the proposed vegetative buffer areas, included as part of the application's Statement of Conditions (Combined Rezoning Package, Statement of Conditions, p. 7).
5. **NCDEQ Belews Creek Steam Station Draft Environmental Justice Report (May 2021), Figure of 2-Mile Study Radius and Census Tracts 701/707.** Used as an independently prepared reference for demographic and sensitive-receptor data in the area surrounding the adjoining Belews Creek Steam Station. Available at: ¹¹⁹.

¹¹⁶Stokes County GIS — <https://stokescountygis.com/server/rest/services/AllLayers/MapServer>

¹¹⁷FEMA Flood Map Service Center — <https://msc.fema.gov/portal/productAvailability>

¹¹⁸NC HPO GIS Maps and Data — <https://www.hpo.nc.gov/survey-and-national-register/gis-maps-and-data>

¹¹⁹NCDEQ Belews Creek Draft EJ Report — https://files.nc.gov/ncdeq/Air%20Quality/permits/2021_public_notice_documents/environmental_justice/Belews-Creek-Draft-EJ-Report-May-2021.pdf

6. **Stokes County 2035 Vision Plan, Land Use Framework Map (Chapter 3).** Used to evaluate the subject property's transect classification relative to the Comprehensive Plan's designated growth areas (Stokes County 2035 Vision Plan, Chapter 3: Land Use, Map 13, p. 76).
7. **NC DEQ/DEMLR Mining Program, Mining Permits.** Used to independently identify active state mining permits on industrial-zoned parcels in the broader area surrounding the subject property. Available at: ¹²⁰.
8. **CDC PLACES: Local Data for Better Health (2025 census tract release and 2025 county release).** Used to independently obtain census tract- and county-level chronic disease and health-related social needs estimates for the environmental justice analysis in Section 8.2. Available at: ¹²¹ and ¹²².
9. **FCC Census Block Conversions API.** Used to independently confirm the current (2020 Census boundary) census tract and block containing the subject property. Available at: ¹²³.

¹²⁰NC DEQ/DEMLR Mining Program, Mining Permits —

https://services2.arcgis.com/kCu40SDxsCGcuUWO/arcgis/rest/services/NC_Mining_Permits/FeatureServer/0

¹²¹CDC PLACES Census Tract Data — <https://data.cdc.gov/500-Cities-Places/PLACES-Local-Data-for-Better-Health-Census-Tract-D/cwsq-ngmh>

¹²²CDC PLACES County Data — <https://data.cdc.gov/500-Cities-Places/PLACES-Local-Data-for-Better-Health-County-Data-20/swc5-untb>

¹²³FCC Census Block Conversions API — <https://geo.fcc.gov/api/census/>