



Martin Crim  
Town Attorney  
21 Main Street  
Warrenton, VA 20186

With Copy To:

Robert Walton  
Heather Jenkins  
21 Main Street  
Warrenton, VA 20186

September 14, 2023

Re: SDP-2023-6 plan resubmission

Dear Mr. Crim:

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

We make this request for the following reasons:

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





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

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

The datacenter depicted in the three documents cited below (the **SWM Maintenance Agreement Exhibits; SUP Site Plan Overlay Exhibit; and August 15, 2022 Geotechnical Report**) support critical functions for both Amazon and its customers (both private and public) in different industries, including banking, healthcare, defense, and government. Disclosure of the referenced pages, which contain detailed diagrams of the datacenter facility, could enable others to exploit security vulnerabilities to adversely impact Amazon, its customers, and their respective end users.

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

The information contained in the three documents described above and cited in the table below depicts access control features comprising the security system used to control access to or use of Amazon's automated data processing or telecommunications system. Disclosure of the information in the cited pages of the documents would undermine the physical security measures implemented by Amazon.

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

Applicant's representatives from Bohler Engineering and Corgan

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





AMAZON DATA SERVICES, INC.

By: Josh Weissman  
68784E59B2CD47C...

Name: Josh weissman

Title: Authorized Signatory

Date Signed: September 18, 2023





Item	Statutory Citation	Document and Page Number	Justification for Requested Exclusion
1	Va. Code § 2.2-3705.2(14)	<p>SWM Maintenance Agreement Exhibits at PDF p. 1;</p> <p>SUP Site Plan Overlay Exhibit at PDF p. 1; and</p> <p>August 15, 2022 Geotechnical Report at PDF pp. 10, 41.</p>	<p>The pages listed are a part of Amazon's engineering and construction drawings, architectural drawings, and other records, and reveal the layout of the facility and individual buildings, personnel deployments, operational and/or transportation plans. This includes, for example, information concerning the location of the perimeter fence and specifications of its construction, the facility's security plans and measures, the location(s) of manual or automated security features, and the location(s) of certain structures and systems.</p> <p>Physical security is a central pillar of cybersecurity because physical breaches can facilitate hacking. Implementing stringent physical security measures mitigates risks against this danger.</p> <p>Disclosure of this information would jeopardize the safety or security of persons at the facility and, more broadly, could jeopardize the security of individuals relying upon the continuous functionality of the services provided by the facility due to the unique nature of applicant's customers. Failure to preserve the confidentiality of this information would also create a cybersecurity vulnerability, impermissibly reveal the security plans and measures of the facility, building structures, and information technology systems contained in the buildings.</p> <p>Due to the unique nature of Amazon's customers, which includes public and private clients, disclosure of this information could impermissibly reveal the location or operation of security equipment and systems of about the site's electrical systems, telecommunications equipment and systems, or utility equipment and systems.</p>
2	Va. Code § 2.2-3705.2(2)	SWM Maintenance	The listed pages include information that depicts various security designs, functions, operations, or access control





		<p>Agreement Exhibits at PDF p. 1;</p> <p>SUP Site Plan Overlay Exhibit at PDF p. 1; and</p> <p>August 15, 2022 Geotechnical Report at PDF pp. 10, 41.</p>	<p>features of the facility and buildings being constructed by the Amazon to house an automated data processing system or telecommunications system.</p> <p>This includes information concerning the location of the perimeter fence and specifications of its construction, security systems or technologies applicant uses to control access to the facility or buildings, and the location(s) of manual or automated security features.</p> <p>Disclosure of this information could impermissibly reveal security and access control features, which could jeopardize the safety or security of persons at the facility and, more broadly, could jeopardize the security of individuals relying upon the continuous functionality of the services provided by the facility due to the unique nature of applicant’s customers.</p>
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