

Comment-ready evidence appendix

Two bounded public-record modules for an active Virginia DEQ review and the 2026 Draft National Transmission Needs Study.

Version	Date	Status
1.0	July 22, 2026	Prepared - not submitted

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No claim of peer review

This paper is a public methods release and an invitation to review defined questions. Cited agencies and researchers are sources, not endorsers or reviewers.

Module A - QTS Richmond 5 Data Center

Active record: Virginia DEQ federal consistency review, applicant/project number U.S. Army Corps of Engineers 26-075F. Public comment period: July 20 through August 17, 2026. DEQ requires the commenter's name, address, and telephone number; this module is prepared but not submitted.

Project facts stated in the notice

- Applicant: QTS Richmond V, LLC.
- Location: near East Williamsburg Road and Technology Boulevard in White Oak Technology Park, Henrico County.
- Description: approximately 44 acres with data-center buildings, utilities, roads, generators, parking, and stormwater facilities.
- Federal consistency issue: proposed impact to approximately 4.29 acres of wetlands and planned restoration of approximately 10.9 acres in New Kent County.
- DEQ identifies Julia Wellman as the public-comment contact.

Comment text - data and review requests

The following requests are offered to improve the public record and do not state a conclusion on project approval:

- Publish the federal consistency certification, site plan, wetland delineation, impact calculations, and compensatory-restoration plan online in accessible formats.
- Provide machine-readable GIS boundaries for the project footprint, affected wetlands, avoidance areas, and restoration site, with coordinate reference system and acreage definitions.
- Identify the enforceable Virginia Coastal Zone Management Program policies reviewed and publish a policy-by-policy consistency table with source citations.
- Cross-reference related state and federal reviews for stormwater, water supply, air emissions, generator operation, noise, traffic, and utility infrastructure. A cross-reference should distinguish proposed, pending, issued, and operating status.
- Explain how cumulative effects were considered for adjacent or related development in White Oak Technology Park, while avoiding assumptions that permit rows equal operating facilities.
- Publish DEQ's disposition and response to material comments in a durable, searchable record.

Evidence boundary

The Public Evidence Project issued-air-permit index includes a QTS Richmond permit record, but that row cannot establish that the proposed QTS Richmond 5 project is the same facility, that it is operating, or that any actual emissions occurred. Identity and project linkage require an official address and program-record match. No personal information should be invented or submitted without authorization.

Module B - 2026 Draft National Transmission Needs Study

Active record: U.S. Department of Energy Office of Electricity. The public comment and consultation period closes September 7, 2026. DOE requests comments on the analysis, gaps, conclusions, and suggestions for improving the draft.

Comment text - reproducibility and local evidence

- For each data-center load-growth input, publish the unit of observation, geography, time horizon, scenario, vintage, and whether the value is observed, contracted, queued, announced, or modeled.
- Separate facility counts from permit counts, buildings, campuses, interconnection requests, and aggregate megawatts. These units are not interchangeable.
- Provide downloadable regional input tables and a change log connecting draft-to-final revisions to source updates and public comments.
- Where public data are unavailable, label the gap rather than treating absence as no need. DOE's own FAQ recognizes that data absence does not necessarily indicate no transmission need.
- Connect national and regional findings to source-linked state records when useful, while preserving state-record boundaries. An issued air permit does not establish load, operating status, or actual generator use.
- Document sensitivity tests for high-growth load assumptions and distinguish reliability needs driven by peak load, energy demand, congestion, generator interconnection, and large-load interconnection.
- Publish a machine-readable source inventory for the more than 120 reports assessed by the study, including stable URLs, dates, geography, and the specific finding supported.

Virginia example

Virginia's issued data-center air-permit table is useful as a regulatory-document trail, not as a direct measure of data-center load or operation. Virginia DEQ's separate ambient-monitoring project is useful for measured concentration context, but its APEX/Kunak sensors are not regulatory instruments and the analysis does not attribute observations to individual facilities. DOE can improve reproducibility by keeping these evidence types separate.

Requested disposition

Please add a final-study appendix that maps each major load-growth finding to its source, unit, scenario, geographic resolution, uncertainty treatment, and public download. If a requested item is not feasible, identify the limitation and the intended future data path.

Sources and submission notes

Virginia DEQ public notice - QTS Richmond 5 Data Center: <https://www.deq.virginia.gov/Home/Components/Calendar/Event/5172/17>

Virginia DEQ environmental impact review notices: <https://www.deq.virginia.gov/news-info/shortcuts/public-notice/environmental-impact-review>

DOE National Transmission Needs Study: <https://www.energy.gov/oe/national-transmission-needs-study>

DOE announcement, July 9, 2026: <https://www.energy.gov/oe/articles/does-office-electricity-publishes-2026-draft-national-transmission-needs-study>

Virginia DEQ data-center air monitoring project: <https://www.deq.virginia.gov/news-info/shortcuts/topics-of-interest/data-center-air-monitoring-project>

Public Evidence Project data page: <https://publicevidence.org/data>

Public Evidence Project air-monitoring page: <https://publicevidence.org/virginia/data-centers/air-monitoring>

Module	Official channel	Deadline	Current status
QTS Richmond 5	Email or postal mail to DEQ; personal contact details required	August 17, 2026	Prepared, blocked on authorized representative details
DOE Needs Study	NeedsStudy.Comments@hq.doe.gov	September 7, 2026	Prepared, not submitted

This appendix is designed to be incorporated into a formal comment. It is not evidence that a comment has been filed or accepted into an agency record.