



Appalachian Trail Conservancy

January 9, 2026,
Middlesex Township Attn: Zach Zook, Township Manager
350 N. Middlesex Rd, Suite 1
Carlisle, PA 17013

Re: Pennsylvania Digital 1 (PAX-1) Data Center Proposal

Dear Mr. Zook:

On behalf of the Appalachian Trail Conservancy (ATC), I am writing to share our concerns regarding the proposed data center campus on approximately 700 acres off Country Club Road in Middlesex Township. Plans shared by LIVIC, the project engineers, show this project to be adjacent to the Appalachian National Scenic Trail (A.T.) and visible from several A.T. viewpoints. We are concerned that this campus, just 0.3 miles from the A.T., may significantly change the visual landscape of the area, have negative repercussions on visitors' experience of the A.T. in this region, and impact the local ecosystem.

The Appalachian National Scenic Trail is a 2,190+ mile-long public footpath that traverses the scenic, wooded, pastoral, wild, and culturally resonant lands of the Appalachian Mountains from Maine to Georgia. In 1968 Congress officially recognized the national significance of the A.T. when it designated it as one of the first National Scenic Trails with the passage of the National Trails System Act. Today the A.T. and its corridor (the lands it traverses) are managed as a unit of the National Park Service. The A.T. is enjoyed by many millions of people each year and is within a day's drive of two thirds of the U.S. population. It is also the largest protected contiguous corridor east of the Mississippi River.

ATC is charged under the National Trails System Act with administration of the length of the Appalachian Trail in cooperation with the National Park Service, US Forest Service, numerous state agencies, and thousands of volunteers. ATC's mission is to protect, manage, and advocate for the A.T. for its significance as a recreational and economic asset for the communities through which it passes, including the Commonwealth of Pennsylvania and the Cumberland Valley. This mission extends to preserving visitors' experience of the Trail, and the ecological and cultural integrity of the region. In Middlesex Township, the A.T. is maintained and managed by the Cumberland Valley Appalachian Trail Club (CVATC), one of thirty A.T. maintaining clubs.

ATC and members of the local communities have been following the proposed data center project and have attended the open house and other related township meetings the project was shared with the community. In response to the proposal presented by the developer and our phone call with the developer's engineering firm, LIVIC Civil, our initial concerns at this stage relate to three issues: 1) viewshed protection, 2) noise and light pollution 3) loss of habitat.

1) Viewshed Protection

In 2021, the views or viewsheds from the portion of the A.T. closest to the project location were documented using an established process designed by the National Park Service and executed by a trained team. Views are defined as a fundamental value and resource of the A.T., as it is a National *Scenic* Trail. We are concerned that the proposed data center campus and associated PPL substation will adversely impact



the A.T. viewshed. We are anticipating a significant change and overall negative impact to this cluster of pastoral, agricultural and rural Pennsylvania A.T. views should the proposed development be approved as proposed.

1.1 We request that an independent viewshed analysis be conducted using ATC's chosen observation points. Both ATC and the National Park Service have experience preparing trail viewpoint impact analysis maps and assisting with balloon tests and the production of simulated views. We would be happy to assist with reviewing the analysis being prepared, or the eventual developer-provided visual impact study. A development of this scale adjacent to the A.T. has the potential to significantly diminish the Pennsylvania A.T. Experience.

1.2 We request that native or non-invasive tall evergreen plantings are placed to block the buildings and associated PPL substation from view between the A.T. and the eastern border of their property be planted. The character of the landscape along the entire Cumberland Valley stretch of the A.T. is historically and currently agricultural, pastoral, and rural. Several local farmers hold Special Use Permits to help us maintain the desired pastoral landscape character in this area. These buildings will fundamentally change the character of the landscape beyond where they are visible. We anticipate that the development will be continuously visible for a long stretch of the A.T.- ~800 feet in length, or for about a 7-minute-long walk.

1.3 We recommend planting a green roof on the buildings or having them painted a darker, muted color that will blend into the landscape. Additional negative impacts to the view will likely be evident when the development area is viewed from above, like from the Cumberland Valley Overlook. The roofs of the buildings will be geometric, with straight lines, on landscape full of organic shapes and curving lines. If the roof and the accessories on the roof are white, light, or reflective, it will stand out in terms of color and line and be incongruous with the landscape character. A green roof will also help mitigate noise pollution (see section 2).

2) Noise and Light Pollution

Construction and daily operation of the Data Center will increase noise disturbance in the A.T. corridor while the lighting required for operations and safety will impact the night sky. With highway noise from I-81 already a concern in the area we aim to ensure that the hiking experience is not diminished further by noise from traffic and power generators and cooling operations at the data center.

2.1 We request that there is no net increase to noise levels along the A.T. in this area. This may require an analysis of existing noise levels from the A.T. and additional noise generated by the Data Center.

2.2 We request that DarkSky International standards are adhered to. Doing so ensures that lights are only on when needed and that no more lighting than necessary is used, and that lighting is focused downward and doesn't extend off the property.



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3) Habitat Loss and Cumulative Impacts

With a development of this size, we are concerned that habitat, particularly for ground-nesting birds, such as the eastern meadowlark, will be impacted.

3.1 We ask that long term environmental impacts during the construction and operation state be considered, that measures be taken to reduce impacts to habitat, and that intentional native landscaping be incorporated into the project to support beneficial habitat amendments.

The ATC is concerned about this development, its potential impacts to the Appalachian National Scenic Trail and the natural landscape. We ask that the Planning Commission and developers consider input from the ATC and our partners when evaluating the proposed development plan and consults with us throughout the planning process to identify and mitigate any adverse impacts to the greatest extent possible. The role of the A.T. in Pennsylvania is significant as it supports a strong outdoor recreation economy while protecting the scenic, natural and cultural resources of the Commonwealth. We appreciate the opportunity to share our concerns and commitment to the preservation of the A.T. and to the Trail experience. If you have questions, please feel free to contact us.

Sincerely,

A handwritten signature in cursive script that reads "Rachel Lettre".

Rachel Lettre
Regional Director, Mid-Atlantic
Appalachian Trail Conservancy
Email: rlettre@appalachiantrail.org
Phone: 202-985-3580

cc:

Donald S. Geistwhite Jr., Middlesex Township Board of Supervisors Chair
Mark Carpenter, Middlesex Township Zoning Officer
Eileen Gault, Middlesex Township Manager
Elizabeth Grant, Cumberland County Planning Department
Kurt Speers, Superintendent Appalachian National Scenic Trail, National Park Service
Vicky Kelley, Cumberland Valley Appalachian Trail Club
Brook Lenker, Keystone Trail Association
Katie Hess, South Mountain Partnership
Ed Stireli, National Parks Conservation Association

Attachments: Viewshed Map

A.T. Viewshed with Scenic Inventory Value Overlay for Northern Portion of Cumberland County, PA

