



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



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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,

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