

Building Division – Zoning Section
City of St. Louis
Basis for Conditional Use Hearing
#AB-589087-26 & #AB-589090-26

SECTION 1: TO BE COMPLETED BY ZONING STAFF

Application for: Construct Commercial Building – Data Center
(Zoning Only)
Address: 3728-46 Market Street & 3852-58 Market Street
The present zoning for this address is: “K” Unrestricted District

Remarks (describe in detail the basis for the Conditional Use Hearing):

The applicant, is seeking a building permit (Zoning Only) to construct a data center at 3728-46 Market Street & 3852-58 Market Street, which will be consolidated, at a later date. The plans include adaptive reuse of a portion of the existing Famous Barr Warehouse, while the majority of the proposed 525,000 square feet building will be new construction. The data center will include eight (8) data halls across three (3) levels or floors, along with space for electric battery storage, power distribution units, and computer room air handlers. Generators will be placed both on the exterior and interior of the structure. Additionally, fifty (50) off-street, surface parking spaces will be provided, west of the building.

On September 19, 2025 Mayor Cara Spencer Signed Executive Order No. 92 directing departments to develop a framework for incorporating data centers, and providing for additional information gathering for proposed data center facilities as part of permit applications, until such frameworks are available.

Under the directive of this Executive Order, a new or expanded data center facility, in the “K” District, shall require Conditional Use approval.

- Will this application trigger off-street parking requirements? Yes No
- Will this application generate an additional building permit application? Yes No
- Will this application generate an additional occupancy permit application? Yes No PMT

Prepared by:



Signature of Zoning Staff

(Date)

SECTION 2: TO BE COMPLETED BY THE APPLICANT(S)

I (we) wish to proceed with the Application process by requesting a Conditional Use hearing. Enclosed please find my non-refundable fee of \$50.00, by cash, or a check or money order made payable to the City of St. Louis.

Signature of Applicant(s) (Date)

Signature of Applicant(s) (Date)

SECTION 3: TO BE COMPLETED BY THE SECRETARY

Payment Method:

Date Fee Received: _____

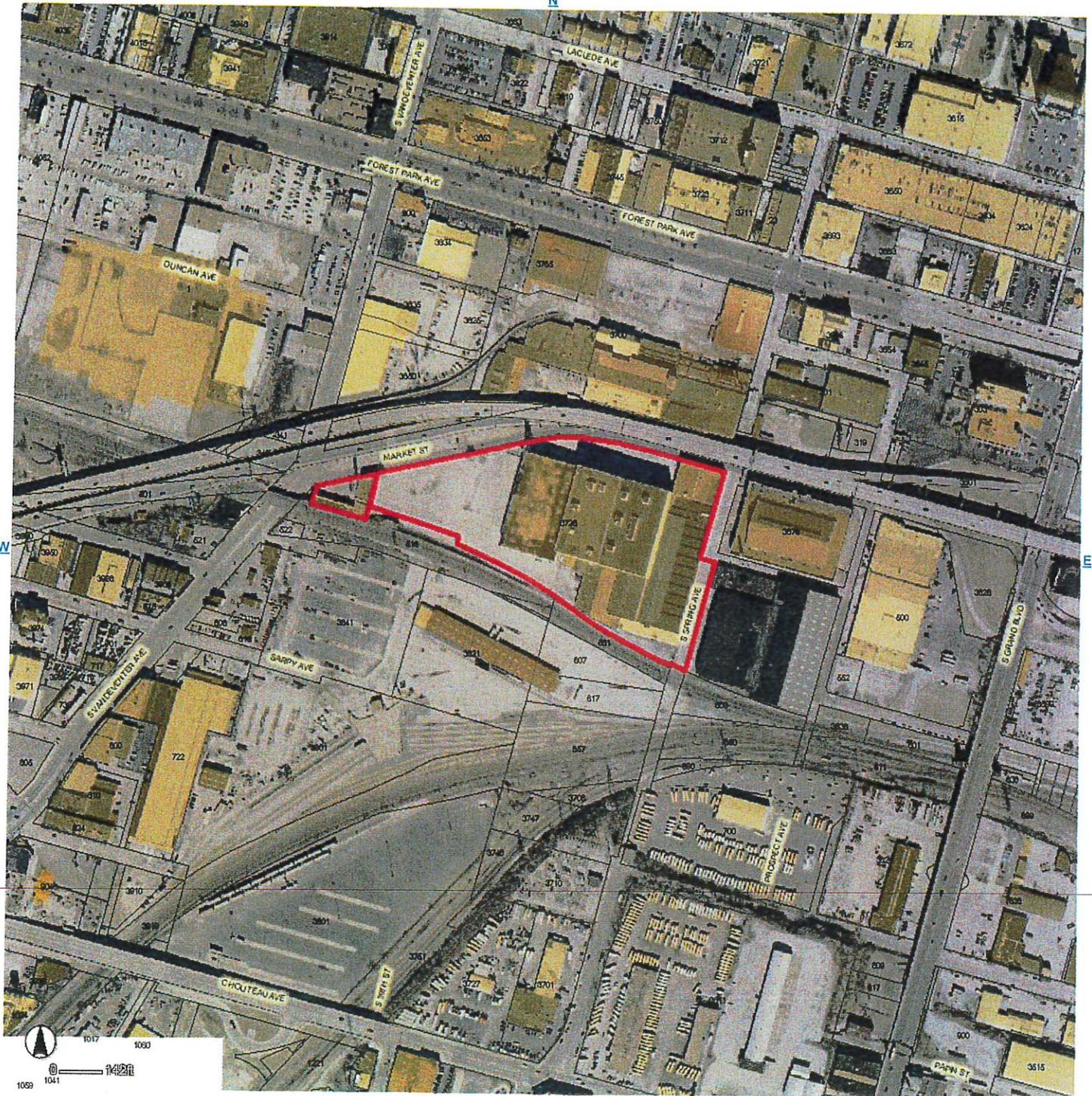
Cash \$ _____

Check No. _____

Money Order No. _____

Agenda Date: _____

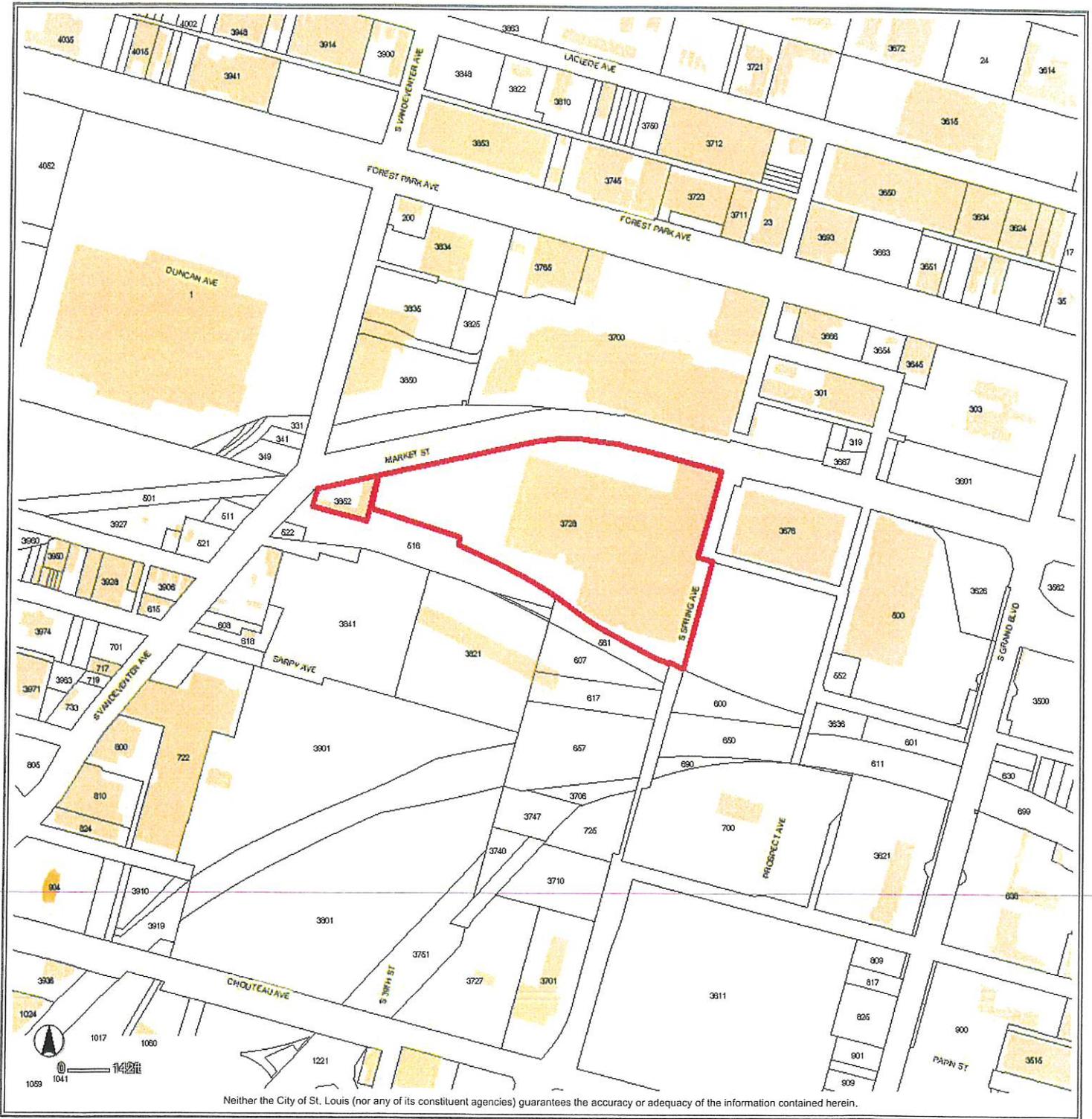
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Neither the City of St. Louis (nor any of its constituent agencies) guarantees the accuracy or adequacy of the information contained herein.

EVAR

3728-46 MARKET ST

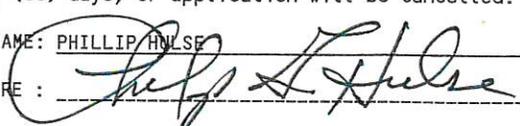
1	11 1 10 10 3929.00 APPLICATION FOR PERMIT DIVISION OF BUILDING AND INSPECTION DEPARTMENT OF PUBLIC SAFETY CITY OF ST LOUIS	12	ROUTING
APPLICATION # AB589087-26		DATE INIT	
Project Address: 3728-46 MARKET ST		<input type="checkbox"/> Bldg. <input type="checkbox"/> Elec. <input type="checkbox"/> Mech. <input type="checkbox"/> Plumb. <input type="checkbox"/> Air Pol. <input type="checkbox"/> Fire Mar. <input type="checkbox"/> Street <input type="checkbox"/> Min. Ext. <input type="checkbox"/> Plan Exam <input checked="" type="checkbox"/> Zoning <input type="checkbox"/> A.D.A. <input type="checkbox"/> 353 <input type="checkbox"/> 99/100	
2	OCCUPANT Name: VACANT Address:	Phone: 312-613-6123 C/O : City : ST. LOUIS	ST: MO ZIP: 0
3	SEND ALL CORRESPONDENCE TO: Name: DAVID LAMBIASO Address: 9750 CORBITT CIRCLE Email: dl@terrawatt.com	Phone: 312-613-6123 C/O : City : MANASSAS PARK	ST: MO ZIP: 20111
4	OWNER Name: GS 3728 MARKET INVESTORS LLC Address: 4565 MCREE AVE STE 100	Phone: 312-613-6123 C/O : DAVID LAMBIASO City : ST LOUIS, USA	ST: MO ZIP: 63110

5 APPLICATION TO: CONSTRUCT COMMERCIAL BUILDING - ZONING ONLY			
6	TYPE OF PROJECT: New Const.	9	TYPE OF STRUCTURE: Commercial Class: 0 Units: 1
7	SPECIAL REQUIREMENTS: EDC APPROVAL 99 HOUSING CONS. ENTERPRISE ZONE	10	CURRENT ZONING: K Non-Conforming:
		11	PERMIT INFO Date Issued: Permit No. : - 0 Expiration :
		13	BUILDING INFORMATION New Use: DATA CENTER Group: B Old Use: VACANT Group: U Fire Cons Type: Floor Location: 0 Room/Apt #: # of Plans : 3 Specifications: Sprinkler Sys.: Length : ft Width : ft Area : sqft Height : ft Volume : cuft Stories: Live Load: Occ Load: Fire Grade: 0 Constr Type: Basement: 3500+ sqft: Permit Fee = \$ 0.00
8		14	PROJECT COST: \$0.00

15-18 REQUIRED INSPECTIONS		
Code	Qty	Description
100	1	Gen Build Insp

19	PERMIT DATA Processed by: SHARON HAMILTON Reviewed by: Issued by:	21	ARCHITECT OR ENGINEER License #: 0 Phone: Name :	22	FEEES Building \$ 0.00 Blasting \$ 0.00 Demolition \$ 0.00 Electrical \$ 0.00 Mechanical \$ 0.00 Plumbing \$ 0.00 Occupancy \$ 0.00 LRF \$ 0.00 Signs \$ 0.00 Appl. Fee \$ 25.00 SDF \$ 0.00 Surcharge \$ 0.00 TOTAL \$ 25.00 PAID \$ 0.00
20	REMARKS: CU EX. ORDER 92	23	CONTRACTOR License #: 0 Phone: Name : ARCO CONSTRUCTION COMPANY Address : 900 NORTH ROCK HILL City : ST. LOUIS ST: MO ZIP: 63119		

24 I the undersigned do hereby affirm: the above statements are true and correct and also agree to comply with the provision of the ordinances of the City of St. Louis. The proposed work is authorized by the owner in fee and I have obtained the authorization to make this application. Upon notification of approval permit fee must be paid and permit obtained within thirty (30) days, or application will be cancelled.

[X] Owner PRINT NAME: PHILLIP HULSE
 [] Owner Rep.
 [] Contractor SIGNATURE: 

PAID

OFFICE USE ONLY

INSPECTION REPORT [] O.K. to Issue PMT [] Job Card

JAN 16 2026
 Dept. of Public Safety
 Div. of Building & Inspection

INSPECTOR NAME _____ ID # _____ DATE OF INSPECTION _____

3852-58 MARKET ST

11 1 10 10 3950.00 APPLICATION FOR PERMIT
 WARD PRC DIST SDIST CITY BLK NO DIVISION OF BUILDING AND INSPECTION
 APPLICATION # AB589090-26 Application DEPARTMENT OF PUBLIC SAFETY
 Date 01/16/26 CITY OF ST LOUIS

Project Address: 3852-58 MARKET ST Unit No.:

12	ROUTING	DATE	INIT
	Bldg.		
	Elec.		
	Mech.		
	Plumb.		
	Air Pol.		
	Fire Mar.		
	Street		
	Min. Ext.		
	Plan Exam		
	C.R.O.		
	Zoning		
	A.D.A.		
	353		
	99/100		

2 OCCUPANT
 Name: VACANT Phone:
 Address: C/O :
 City: ST. LOUIS ST: MO ZIP: 0

3 SEND ALL CORRESPONDENCE TO:
 Name: DAVID LAMBIASO Phone: 312-613-6123
 Address: 9750 CORBITT CIRCLE C/O :
 Email: dl@terra watt.com City: MANASSAS PARK ST: MO ZIP: 20111

4 OWNER
 Name: GS 3728 MARKET INVESTORS LLC Phone: 312-613-6123
 Address: 4565 MCREE AVE STE 100 C/O : DAVID LAMBIASO
 City: ST LOUIS, USA ST: MO ZIP: 63110

5 APPLICATION TO: **CONSTRUCT COMMERCIAL BUILDING - (ZONING ONLY)**

6 TYPE OF PROJECT: New Const.

9 TYPE OF STRUCTURE:
 Commercial
 Class: 0 Units: 1

13 BUILDING INFORMATION
 New Use: **DATA CENTER** Group: B
 Old Use: VACANT Group: U
 Fire Cons Type:
 Floor Location: 0 Room/Apt #:
 # of Plans : 3 Specifications:
 Sprinkler Sys.:
 Length : ft Width : ft
 Area : sqft Height : ft
 Volume : cuft Stories:
 Live Load: Occ Load: Fire Grade: 0
 Constr Type: Basement: 3500+ sqft:
 Permit Fee = \$ 0.00

7 SPECIAL REQUIREMENTS:
**HOUSING CONS.
 ENTERPRISE ZONE**

10 CURRENT ZONING: **K**
 Non-Conforming:

11 PERMIT INFO
 Date Issued:
 Permit No. : - 0
 Expiration :

8 PROJECT COST: \$0.00

15-18 REQUIRED INSPECTIONS

Code	Qty	Description	Code	Qty	Description	Code	Qty	Description
100	1	Gen Build Insp						

19 PERMIT DATA
 Processed by: SHARON HAMILTON
 Reviewed by:
 Issued by:

21 ARCHITECT OR ENGINEER
 License #: 0 Phone:
 Name :

22 FEES

Building	\$	0.00
Blasting	\$	0.00
Demolition	\$	0.00
Electrical	\$	0.00
Mechanical	\$	0.00
Plumbing	\$	0.00
Occupancy	\$	0.00
LRF	\$	0.00
Signs	\$	0.00
Appl. Fee	\$	25.00
SDF	\$	0.00
Surcharge	\$	0.00
TOTAL	\$	25.00
PAID	\$	0.00

20 REMARKS:
 ADDITIONAL CONTACT- MANAGING MEMBER
 EMAIL ADDRESS PHILIP HULSE - PHIL@
 GREENSTREETSTL.COM
CU EX. ORDER 92

23 CONTRACTOR
 License #: 0 Phone:
 Name : ARCO CONSTRUCTION COMPANY
 Address : 900 NORTH ROCK HILL
 City : ST. LOUIS ST: MO ZIP: 63119

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[X] Owner PRINT NAME: PHILIP HULSE
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INSPECTION REPORT [] O.K. to Issue PMT [] Job Card

OFFICE USE ONLY

PAID

JAN 16 2026

Dept. of Public Safety
 Div. of Building & Inspection

INSPECTOR NAME _____ ID # _____ DATE OF INSPECTION _____

a. Site and Context Information.

i. Distance from residential zoned properties, both existing and in development.

The nearest residential building is the One Foundry Way building roughly 460 feet from the current proposed building and is separated from the subject site by elevated Interstate 64 / depressed US Route 40.

ii. Distance from all nearby schools, parks, greenways, and transit stations.

Nearest grade school is Northside Community Charter Middle School at Grand Center which is roughly 0.65 miles away. The nearest City park is Tiffany Park, roughly 0.86 miles away.

The nearest existing greenway is 0.20 miles away at the rail just north of S Sarah Street and Clayton Avenue; the Brickline Greenway: Cortex MetroLink to Sarah St. The nearest future greenway is planned to traverse along the eastern edge of the project site. The same future greenway will also traverse along the rear of ikea along the southern edge of the site.

The nearest transit station is two parcels away, to the east.

iii. Distance from other existing facilities.

We do not have visibility to into the location of all other data center facilities.

iv. Whether and how the proposed facility building's facade, height, massing, and orientation will be designed to be compatible with the context of adjacent properties and the surrounding area.

The proposed facility has been designed with careful consideration of the adjacent historic Armory building and the broader Midtown context, with particular attention to façade composition, height, massing, and orientation.

The data center building is generally two to three stories in height, with a roof elevation of approximately 50-62 feet and an additional screened mechanical zone extending to approximately 74 feet. The building comprises approximately 525,000 square feet, with massing articulated through consistent vertical bays, façade modulation, and material variation to reduce perceived scale along its length.

Key architectural features include:

- Precast concrete façade systems with brick-toned finishes and masonry detailing, selected to complement the historic character and proportions of the adjacent Armory

- Regularized window patterns and vertical articulation to echo the rhythm of nearby historic industrial structures
- Architectural metal screening integrated at the roofline to fully screen rooftop and mechanical equipment
- Building orientation and massing designed to present a cohesive, ordered façade along Interstate 64, while screening views of mechanical equipment and limiting visual impacts from regional vantage points
- Opaque fencing and screened enclosures along the southern, western, and northern portions of the site to limit visibility of exterior equipment areas

v. Whether and how any large mechanical equipment located on the proposed facility's property or roof will be screened from public view, and how noise will be mitigated.

Large mechanical equipment associated with the proposed facility is anticipated to be located along the north, south, and western edges of the building and, where required, on the rooftop.

Visual and noise impacts would be mitigated through a combination of site placement, architectural screening, and equipment enclosures, including:

- Placement of equipment away from primary public frontages where feasible
 - Architectural screening and parapets integrated into the building design to limit visibility from public rights-of-way
 - Sound-attenuated equipment and enclosures, including acoustically treated housings for generators and mechanical systems
-
- Compliance with applicable City noise standards, with final equipment selection and placement refined during detailed design and permitting

Final screening methods, equipment specifications, and noise mitigation measures would be confirmed through the building permit and related review processes ensuring compatibility with surrounding uses and minimizing off-site impacts.

vi. The risk of natural disasters such as flooding, seismic events, or tornadoes at the proposed location, and what mitigation measures are included in the proposed facility design for those disasters.

While the risk of seismic events or tornados is the same at this location as anywhere, the site is not in the 100 or 500 year flood plain. Should measures be required to address a seismic event or a tornado, the facility could turn on and use

on site back up generators and would ONLY be used in emergency situations or for monthly functionality checks.

vii. Square footage of the proposed facility.

525,000 SF

b. Infrastructure and Utility Impact Information.

i. How much power will be required to operate the proposed facility.

The proposed facility is being planned with a maximum design capacity of up to approximately 120 megawatts, consistent with large-scale data center facilities.

Actual power usage would be phased and incremental, occurring over time as the facility is built out and as an end user is secured. Initial operations would require significantly less power than the maximum design capacity, with load increasing gradually based on tenant needs and deployment schedules.

Power service would be provided through existing system capacity, with an additional, developer-funded on-site substation planned to enhance redundancy and resiliency. All power requirements and any supporting infrastructure would be coordinated with Ameren Missouri and implemented in accordance with applicable tariffs, engineering standards, and regulatory approvals.

ii. The proposed facility's proposed sources of energy, and whether the facility plans provide its own energy through any renewable sources.

The proposed facility would draw its energy from existing Ameren substation and while the site does not have room to provide its own energy through renewable sources, however, the developer can commit to pursuing Ameren's renewable energy programs for all components of the project they are responsible for, however, the end user would be responsible for their own agreements.

iii. How the existing local utility grid will be able support the demand for power the proposed facility will create.

Ameren Missouri has confirmed that the existing local electric grid can support the power demand associated with the proposed facility. Ameren has planned for and invested in system upgrades over multiple years to accommodate increased demand from large-scale users.

The project would be served through existing system capacity, with an additional on-site substation planned to enhance redundancy and resiliency, consistent with

standard utility practice for critical facilities. All project-specific electrical infrastructure required to serve the facility would be funded by the developer, in accordance with Missouri's applicable tariffs, ensuring that costs are not borne by existing residential, institutional, or business customers.

The project team would continue to coordinate closely with Ameren Missouri to ensure reliable service and alignment with all tariff, engineering, and permitting requirements.

iv. Whether the proposed facility has a Power Usage Effectiveness (PUE) rating.

Power Usage Effectiveness (PUE) is influenced by final equipment selection, tenant configuration, and operating conditions and is typically confirmed once a facility is fully designed and operational.

At this stage, the proposed facility is prepared to commit to a design that hits a PUE of 1.35 or better, consistent with current best practices for energy-efficient data center design. Final PUE performance would be confirmed following detailed engineering, equipment selection, and commissioning and would reflect actual operating conditions.

v. Whether new substations or transmission lines will be needed to support the proposed facility, and where needed infrastructure would be located.

The proposed facility can be supported by existing electrical infrastructure and system capacity, based on coordination with Ameren Missouri.

To enhance system redundancy and operational resiliency, the project includes development of an additional substation located on the former bus depot site, within the project area. The substation is intended to provide redundant power service and increased reliability, consistent with best practices for critical infrastructure facilities.

All electrical infrastructure improvements, including the substation, would be funded entirely by the developer, consistent with the State of Missouri's tariff requirements for customer-specific facilities. No new off-site transmission lines are anticipated to be required beyond the project area. All improvements would be designed and implemented in coordination with Ameren Missouri and subject to applicable City, state, and utility approvals.

vi. The proposed facility's plans for backup power systems in place (e.g. generators), and plans for regular testing to ensure reliability.

The facility would be equipped with backup generators to ensure continuity of operations in the unlikely event of a utility outage. Given the existing redundancy of Ameren's grid infrastructure, we do not anticipate relying on these generators during normal operations. They would be used only in emergency situations, and for routine testing and maintenance.

Routine testing would occur for short periods, typically no more than one hour per month, in accordance with industry standards and regulatory requirements. This ensures reliability without unnecessary operation. All backup systems would comply with environmental, noise, and safety standards.

vii. How the proposed facility's HVAC systems will be configured.

The HVAC system design for the facility has not yet been finalized. Detailed engineering for heating, ventilation, and cooling would be completed prior to the building permit stage. The final system would be designed to meet all applicable codes and industry standards for efficiency, reliability, and environmental performance.

viii. The proposed facility's plans for cooling aisle containment.

We have not yet finalized the design for how the cooling system would be arranged inside the facility. The final approach would be chosen during the detailed design stage and submitted with the building permit, ensuring it meets all industry standards for efficiency and safety.

ix. How the proposed facility's adequate ventilation will be ensured.

Detailed ventilation design would be completed during the final engineering stage, prior to building permit submission. The facility would be designed to meet or exceed all applicable building codes and industry best practices to ensure safe and adequate ventilation.

Ventilation systems would be engineered to provide reliable airflow, maintain appropriate air quality, and support the specialized cooling needs of a data center. Continuous monitoring and regular maintenance would further ensure that the system operates effectively and safely.

x. Network providers anticipated to be associated with the proposed facility.

Specific network providers associated with the proposed facility have not yet been finalized. Discussions with providers would occur as the project advances, and final

provider information would be determined closer to the facility's commissioning. All network connections would comply with applicable standards to ensure reliability, redundancy, and security.

xi. The proposed facility's security and redundancy plans for fiber connectivity.

The facility is being designed with multiple, redundant fiber pathways to ensure reliable connectivity. Security measures for fiber connectivity would include secure entry points, restricted access to network rooms, and compliance with industry best practices for physical and cyber protection. Final design details would be determined during the engineering phase.

xii. How much water the proposed facility is anticipated to use daily, weekly, monthly, and yearly.

The facility is still in the pre-development stage, and final water-use characteristics would be determined once equipment selection and engineering are complete. At this time, exact daily, weekly, monthly, or annual consumption numbers cannot be provided without being speculative.

The project is being designed to minimize water consumption, including a closed-loop water system and air-cooled chillers that significantly reduce or eliminate the need for ongoing water use.

c. Community and Economic Impact Information.

i. How many temporary construction jobs and permanent operational jobs the proposed facility expects to create.

While the exact number of full-time jobs anticipated on site at the data center would be determined by the end user, it is anticipated that the site would carry roughly 50 positions with a presence at all times of day and night. Similarly, the Armory Creative Tech Office Space next door would carry approximately 150 positions, however, presence would be primarily during daytime hours.

It's anticipated that the project would create 1,050 construction jobs across 2.2M Labor Hours.

ii. How many of the jobs the proposed facility expects to create will be filled by local workers.

Because the project does not have a selected end user committed at this time, the precise number and type of permanent jobs is not yet known, although it is

estimated at 50 for a facility of this size. These figures would ultimately depend on the operational requirements of the tenant or tenants who occupy the facility.

What we can commit to now is:

- Most construction jobs would be filled by local contractors and trades as we have executed a Project Labor Agreement with the Labor Unions.
- While final numbers would depend on the end user, modern data centers typically support a range of highly skilled, high-wage positions (IT, engineering, facility management, security). The developer would work with the future tenant(s) to encourage local hiring and partnerships with workforce development organizations to ensure St. Louis residents benefit.

iii. How much tax revenue the community is anticipated to receive from and as a result of the proposed facility.

Based on the current fiscal impact analysis for the proposed Armory Innovation District facilities, the project is anticipated to generate significant, recurring tax revenue for the City of St. Louis, St. Louis Public Schools (SLPS), and other local taxing jurisdictions.

Over the first 10 years of operation, the proposed facility is estimated to generate approximately \$484.7 million in total taxes and fees, including:

- \$147.7 million to the City of St. Louis
- \$232.7 million to St. Louis Public Schools (SLPS)
- \$104.3 million to other local taxing jurisdictions

In its first year of operation alone, the project is estimated to generate more than \$75 million in total taxes and fees, including over \$35 million for SLPS.

These estimates reflect:

- No local tax abatement or local development incentives as none are being requested
- Assumed participation in the Missouri Data Center Sales Tax Exemption Program, consistent with state policy

iv. If tax benefits are offered to the proposed facility, the net benefit of such tax incentives to the community.

The development team will not request or receive any local tax incentives or abatement from the City of St. Louis for the proposed facility.

The project anticipates participating in the Missouri Data Center Sales Tax Exemption Program, which provides an exemption from state and local sales tax at the point of purchase for certain qualifying data center equipment. This exemption applies only to eligible equipment purchases and does not provide ongoing tax relief.

The net benefit of this state program to the community includes:

- One-time, transaction-based tax relief limited to qualifying equipment purchases, rather than recurring or operational tax reductions.
- No impact on ongoing local tax bases, as the exemption does not apply to real estate taxes, personal property taxes assessed on equipment once placed in service, utility taxes, earnings taxes, or other recurring local revenues.
- Significant long-term revenue generation, with the proposed facility projected to generate approximately \$484.7 million in total taxes and fees over the first 10 years of operation, substantially exceeding the value of the one-time sales tax exemption.
- Enablement of large-scale private investment, allowing the project to proceed at a scale that delivers sustained public revenue, employment, and economic activity over time.

As a result, participation in the Missouri Data Center Sales Tax Exemption Program produces a net-positive fiscal outcome by facilitating significant private investment while expanding long-term local and school district tax revenues.

v. Any community benefits offered by the proposed facility or its operators.

The proposed facility is being advanced with a clear intent to deliver long-term community benefits at the neighborhood, citywide, and school district levels, independent of a specific end user and aligned with City priorities for inclusive economic development, workforce opportunity, environmental stewardship, and fiscal stability. Key community benefits include:

- **Job Creation and Workforce Opportunity**

The project is expected to generate approximately 1,050 construction jobs, representing an estimated 2.2 million labor hours, supported by a Project Labor Agreement to help ensure local workforce participation and labor standards. Once operational, the facility is expected to support approximately 200 permanent on-site jobs, including high-skill positions. The development team intends to work with future operators to prioritize local

hiring and to partner with workforce development organizations to expand training and career pathways in data center operations, information technology, and engineering.

- **Local and MWBE Participation**

The development team is committed to engaging local contractors and vendors and to maximizing participation by Minority- and Women-Owned Business Enterprises (MWBE) across design, construction, and professional services, consistent with applicable City policies and industry best practices.

- **Site Revitalization and Long-Term Stewardship**

The project would transform a long-underutilized site into a secure, actively managed facility with continuous operational oversight, contributing to the stabilization and revitalization of the Midtown corridor and complementing nearby institutional and redevelopment investments.

- **Environmental Stewardship and Sustainability**

The facility would be designed to meet or exceed industry standards for energy and water efficiency, including energy-efficient digital infrastructure targeting a Power Usage Effectiveness (PUE) of 1.35 or better, water-conserving closed-loop and air-cooled systems, and integrated noise-mitigation measures. The Armory office component next door would also be delivered to LEED Certified standards, supporting long-term operational sustainability.

- **Sustained Support for Public Education and Community Services**

Over the first 10 years of operation, the project is projected to generate more than \$230 million in revenue for St. Louis Public Schools, representing a significant, recurring funding source at a scale comparable to levels discussed in recent citywide analyses of school funding. This support is generated without requesting local tax incentives or abatements, reinforcing the project's net-positive contribution to public resources.

- **Future Community and Educational Partnerships**

Once an operator is secured, the project team anticipates pursuing additional community-oriented initiatives, such as partnerships with local schools, technical institutions, or universities, to support internships, STEM education, workforce exposure, and technology-focused learning opportunities.

vi. Whether the proposed facility is anticipated to bring any expansion of broadband and utility services to the surrounding community.

Yes. A meaningful indirect benefits of the proposed facility would be the expansion and strengthening of broadband and utility infrastructure in Midtown. To serve the data center, multiple fiber providers are expected to extend high-capacity connections into the site, which often results in improved internet speed, reliability, and choice for nearby businesses, institutions, and even residents.

In many communities, the arrival of a data center has positioned surrounding neighborhoods to benefit from stronger digital infrastructure and more reliable utilities, creating a foundation for future growth and attracting additional technology-driven businesses. We anticipate the same outcome here in Midtown.

vii. Public outreach and community engagement that has occurred for the proposed facility so far, and any plans for public outreach and community engagement during and after proposed facility development.

Public outreach and community engagement for the proposed facility has included early and ongoing coordination with key City agencies, institutional partners, and community stakeholders, as well as direct engagement with the public.

Engagement to date has included:

- Coordination with the St. Louis Midtown Redevelopment Corporation, Planning and Urban Design Agency, City Zoning Department, Great Rivers Greenway, and other relevant City departments
- Briefings and discussions with the local Alderwoman, organized labor, and business and economic development stakeholders
- Ongoing communication with adjacent property owners and nearby development teams to share project information and address questions as the proposal has evolved
- Two public community engagement sessions—one virtual and one in person—to solicit public input, questions, and feedback regarding the proposed facility

Feedback received through these engagement efforts directly informed substantive changes to the proposal, including:

- New proposed location of the data center to reduce land-use conflict
- Strengthened environmental commitments, including delivery of a LEED Certified building, use of closed-loop water systems to minimize water

consumption, and design targeting a Power Usage Effectiveness (PUE) of 1.35 or better

- Expansion of the project scope to include an integrated creative tech office component

Moving forward, the development team would continue engagement with City agencies, institutional partners such as Saint Louis University, Great Rivers Greenway, and other Midtown stakeholders throughout design, permitting, construction, and operations. Ongoing outreach would focus on sharing information, addressing questions, and maintaining alignment.

d. Safety and Security Information.

i. Measures that will be in place to protect the proposed facility from physical intrusion, such as fencing, surveillance, and access controls.

While the systems have not yet been designed, and the selected end user would inform some of the specific details, the facility is anticipated to be designed to meet or exceed industry standards for physical security. Protective measures would include perimeter fencing around equipment, controlled access points, and 24/7 surveillance systems. Access to the building would be restricted to authorized personnel only through credentialed entry systems, with additional layers of security for sensitive areas.

ii. Fire detection and suppression systems that will be installed at the proposed facility.

Fire detection and suppression systems have not yet been designed. Final systems would be determined during the building permit stage and would be developed to meet all applicable code requirements.

iii. Measures that will be used to protect the proposed facility's network from cyberattacks.

Specific measures that would be used to protect the facility's network from cyberattacks cannot be disclosed. Detailed cybersecurity protocols are considered highly sensitive information; making them public would create unnecessary security risks.

What we can confirm is that the facility would be designed and operated in compliance with all applicable industry standards and best practices for cybersecurity, including federal and state guidelines where relevant. Final protocols would be implemented by the facility operator and continually updated to respond

to evolving threats.

iv. The proposed facility's planned protocols for cybersecurity vulnerability assessments and incident response.

Specific protocols for cybersecurity vulnerability assessments and incident response cannot be disclosed publicly, as releasing this information would create unnecessary security risks. These protocols would ultimately be determined by the facility's operator and are expected to follow industry best practices and federal standards for mission-critical facilities.

At a high level, the facility would be required to conduct regular third-party vulnerability assessments, maintain continuous monitoring, and implement incident response plans that include rapid detection, containment, and remediation of threats. Details of these processes would be finalized and documented as part of the operator's cybersecurity program, but they are not available for public release due to the sensitive nature of the information.

v. The proposed facility's plan for staff training on the above items and plans for mitigation of staff exposure to heat, electrical hazards, and chemical exposure within the proposed facility.

Detailed training programs and safety protocols have not yet been developed, as these would be finalized by the facility operator closer to commissioning. What can be confirmed is that staff training would be designed to comply with all OSHA requirements and industry best practices for mission-critical facilities. Training would address safe work practices, emergency procedures, and hazard awareness.

e. Anticipated Consumer Impact Information.

i. Anticipated effects of the proposed facility upon water and energy bills of City ratepayers.

The proposed facility would not increase water or energy bills for City ratepayers, including residents, small businesses, or St. Louis Public Schools.

With respect to energy, the local utility has indicated that system-wide generation capacity would not be required to support the proposed facility. Per new tariffs passed, large energy users are required to enter into long-term utility service agreements with financial guarantees, ensuring that all costs associated with serving the facility are fully recovered and not shifted to other customers. Any infrastructure required for the project, such as substations or electrical equipment, would be paid for entirely by the developer, in accordance with Missouri utility rules.

With respect to water, the facility would be designed to operate within existing site capacity and is anticipated to use closed-loop and air-cooled systems, which avoid continuous or consumptive water use typical of older cooling methods. Final water-use systems would be confirmed during detailed engineering and building permitting and would comply with all applicable City, State, and federal requirements.

Based on these factors, the proposed facility is structured to proceed without impacting utility costs for City ratepayers.

f. General Information.

i. Whether any proposed facility or project details are subject to non-disclosure agreements such that they could not be fully disclosed as part of a permit process and, if so, the general nature of details that are unable to be disclosed for this reason.

Certain project details are subject to customary non-disclosure agreements related to prospective end users, proprietary operational and security specifications, and commercial terms. These constraints do not limit disclosure of any information required for permitting, zoning, environmental review, or public process, all of which would be fully addressed through the City's approval procedures.

ii. The petitioner, beneficial owner, and companies associated with the proposed facility.

Rod Thomas, THO Investments and David Daneshforooz, Contour and TerraWatt are the developers and investors associated with the project and would assume ownership of the property prior to construction.

iii. The purpose(s) for which the proposed facility is intended to be used, such as data storage, backup, and recovery; cloud computing; artificial intelligence; cryptocurrency mining; e-commerce; business applications; or other purposes.

The proposed facility is intended to operate as a data center providing digital infrastructure services. A specific end user has not yet been identified.

Identification of an end user and confirmation of specific operational uses would occur following completion of the entitlement process, consistent with standard development and leasing practices for data center facilities.

g. Environmental Impact Information.

i. Water Quality Information.

1. How the proposed facility will mitigate any pollution or other negative impact on water quality and availability for nearby residents.

The proposed facility will be designed to minimize impacts on water quality and availability through system selection, regulatory compliance, and coordination with existing infrastructure capacity.

The site currently has approximately 2 million gallons per day of available water capacity, which exceeds anticipated project needs. The project would utilize water-efficient systems, including closed-loop and air-cooled designs, to limit water consumption and avoid continuous or consumptive water use.

Final water-use systems have not yet been designed and would be developed for the building permit during the detailed engineering phase. At that time, the project would be engineered to:

- Comply with all applicable City, State, and federal water quality standards
- Meet stormwater management and discharge requirements
- Avoid adverse impacts to local water availability through efficient system design

The facility would not involve process discharges that would degrade water quality, and all water use would be managed in accordance with applicable regulations and utility requirements.

ii. Air Quality Information.

1. Whether any backup generators for the proposed facility are operated using diesel or natural gas.

Backup power for the proposed facility is anticipated to include diesel-fueled generators, consistent with standard data center design practices, with final fuel type confirmed through engineering.

Any generators would be operated only during emergency conditions or for limited, routine testing and maintenance. All generator equipment would be designed, permitted, and operated in compliance with applicable federal,

state, and local air quality and emissions regulations, including requirements related to emissions controls, testing schedules, and operating hours.

2. The proposed facility's plans to limit emission of pollutants from backup generators during testing and power outages.

Emissions from backup generators would be limited through controlled operations, physical enclosure, and compliance with applicable air quality regulations, consistent with common data center permitting practices.

Anticipated operational practices include:

- Limited operation, with generators used only during utility outages and for routine reliability testing and maintenance.
- Controlled testing parameters, with routine testing anticipated to occur no more than once per month, limited to approximately one hour per generator, and conducted sequentially (one generator at a time) to minimize cumulative emissions.
- Daytime scheduling, with routine testing conducted during reasonable business hours and coordinated where feasible to avoid peak activity periods in the surrounding area.
- Sound-attenuated enclosures, with generators installed within acoustically treated, weather-protective enclosures to reduce off-site impacts and support controlled operation.

All generator systems would be designed, permitted, and operated in accordance with applicable federal, state, and local air quality requirements, with final operating parameters confirmed through the permitting process.

3. The proposed facility's plans to mitigate particulate matter and emissions from any backup generators.

Final backup generator specifications have not yet been determined; however, all equipment would be required to meet or exceed applicable federal, state, and local standards for particulate matter and air emissions.

To mitigate particulate matter and regulated emissions:

- Generator equipment would be selected and permitted in compliance with Missouri Department of Natural Resources and U.S. Environmental Protection Agency requirements, including applicable emissions limits and control technologies.

- Generator operation would be infrequent and time-limited, occurring only during emergencies and for routine testing as described above.
- Final engine type, fuel selection, and emissions controls would be determined during detailed engineering and the air permitting process and incorporated into enforceable permit conditions.

These measures ensure that particulate matter and emissions associated with backup power systems are limited, regulated, and consistent with industry best practices for data center facilities.

iii. Waste Management Information.

1. The proposed facility's plan for handling and disposing of electronic waste associated with the proposed facility, such as old servers and hardware.

Specific protocols for handling and disposing of electronic waste, such as decommissioned servers and hardware, would be determined by the facility's end user or operator. Data center tenants typically maintain their own strict practices for equipment lifecycle management, data destruction, and recycling in order to meet industry, environmental, and security standards.

iv. Noise Information.

1. The expected noise level to be generated by the proposed facility's cooling systems and generators.

Final noise levels cannot be determined until equipment selection is complete, however, we can commit to enclosing and providing sound attenuation for major noise-producing systems. Cooling systems and backup generators would be specified during the design phase, and all equipment would be required to comply with applicable state and federal standards.

Backup generators would only operate during emergencies or limited monthly testing, and noise from these activities would be minimized with the use of modern equipment and, if needed, sound attenuation measures.

2. The proposed facility's planned sound attenuation and noise mitigation measures to limit the emission of noise and prevent disturbances to nearby residents.

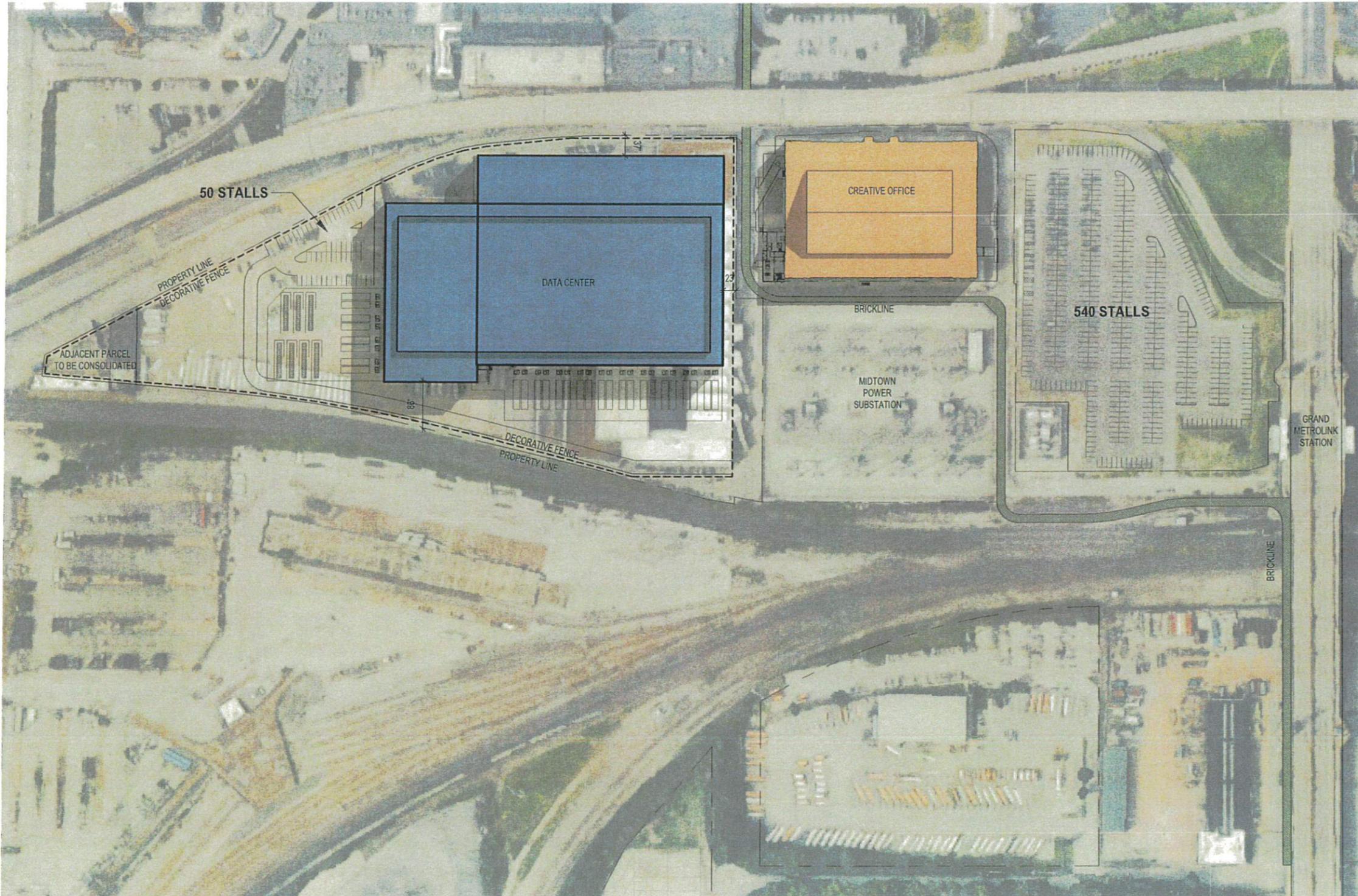
Final sound attenuation measures would be determined during detailed design and equipment selection.

Given that the project site is surrounded by an elevated highway, which creates a high ambient noise environment, this context significantly reduces the likelihood that cooling systems or periodic generator testing would create an impact on surrounding properties. Even so, mitigation measures would include sound-attenuating walls or enclosures around mechanical equipment, vibration isolation, and orienting equipment to direct sound away from adjacent uses. Generators would only operate during emergencies or for short, scheduled testing.

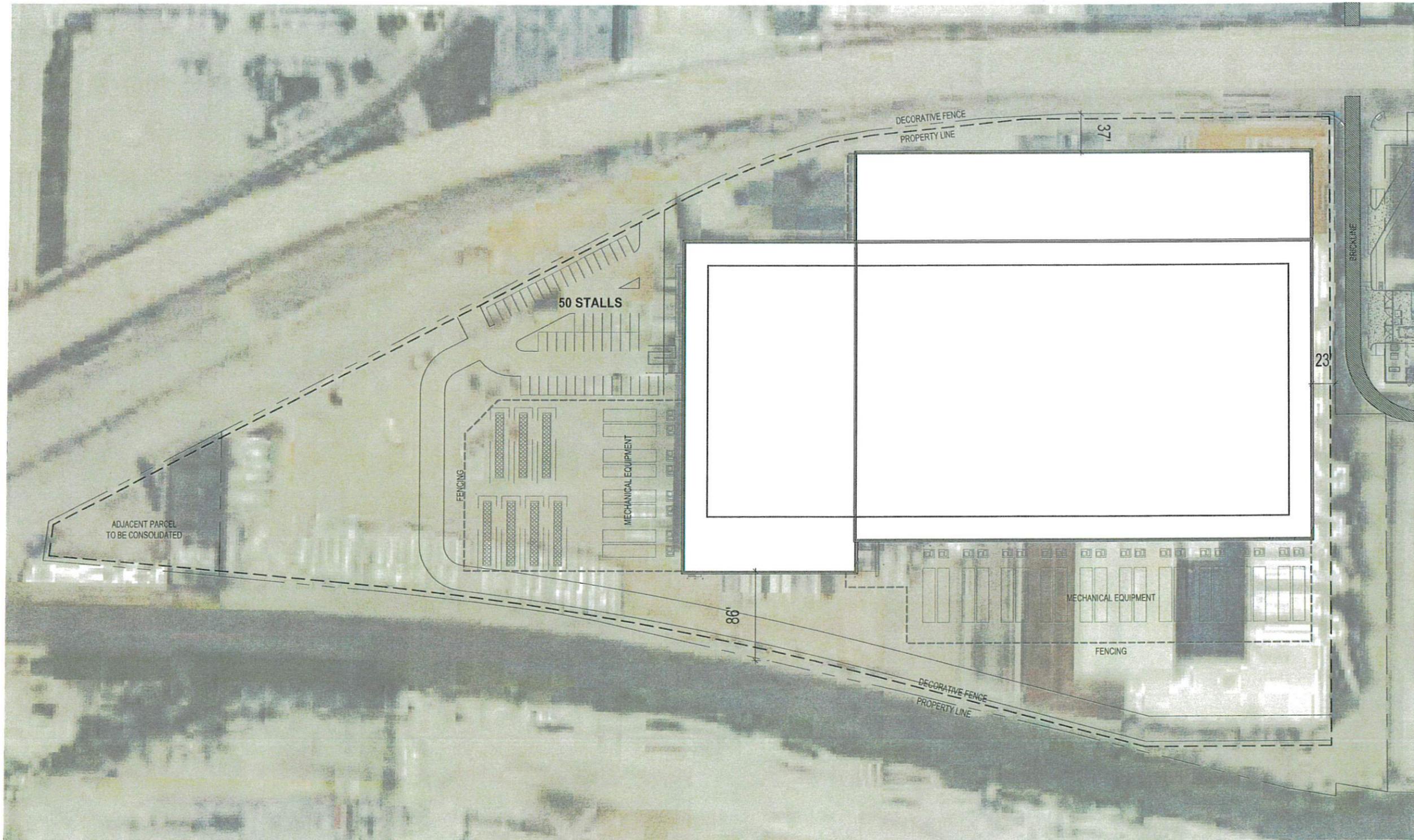
v. Lighting Information.

1. Whether the proposed facility will be illuminated all night, such as for security reasons.

The facility would include security lighting as required, but it would not be unnecessarily illuminated throughout the night. Exterior lighting would be limited to what is needed for safety and security, and it would be designed in accordance with City code and industry best practices to minimize glare, light spillover, and impact on surrounding properties. Lighting would be shielded and directed to ensure it is functional for security purposes without creating a nuisance.



AREAS	
CREATIVE OFFICE	214,413 SF
DATA CENTER	525,000 SF
PARKING REQUIRED	
CREATIVE OFFICE	166 Stalls
DATA CENTER	5 Stalls
PARKING	
EAST LOT	540 Stalls
WEST LOT	50 Stalls
TOTAL	590 Stalls
EXCESS PARKING	419 Stalls



AREAS

DATA CENTER 525,000 SF

PARKING REQUIRED

DATA CENTER 5 Stalls

PARKING

WEST LOT 50 Stalls

EXCESS PARKING 45 Stalls

TITLE: SITE PLAN - DATA CENTER

DATE: 02.03.2026

PROJECT: ST LOUIS ARMORY

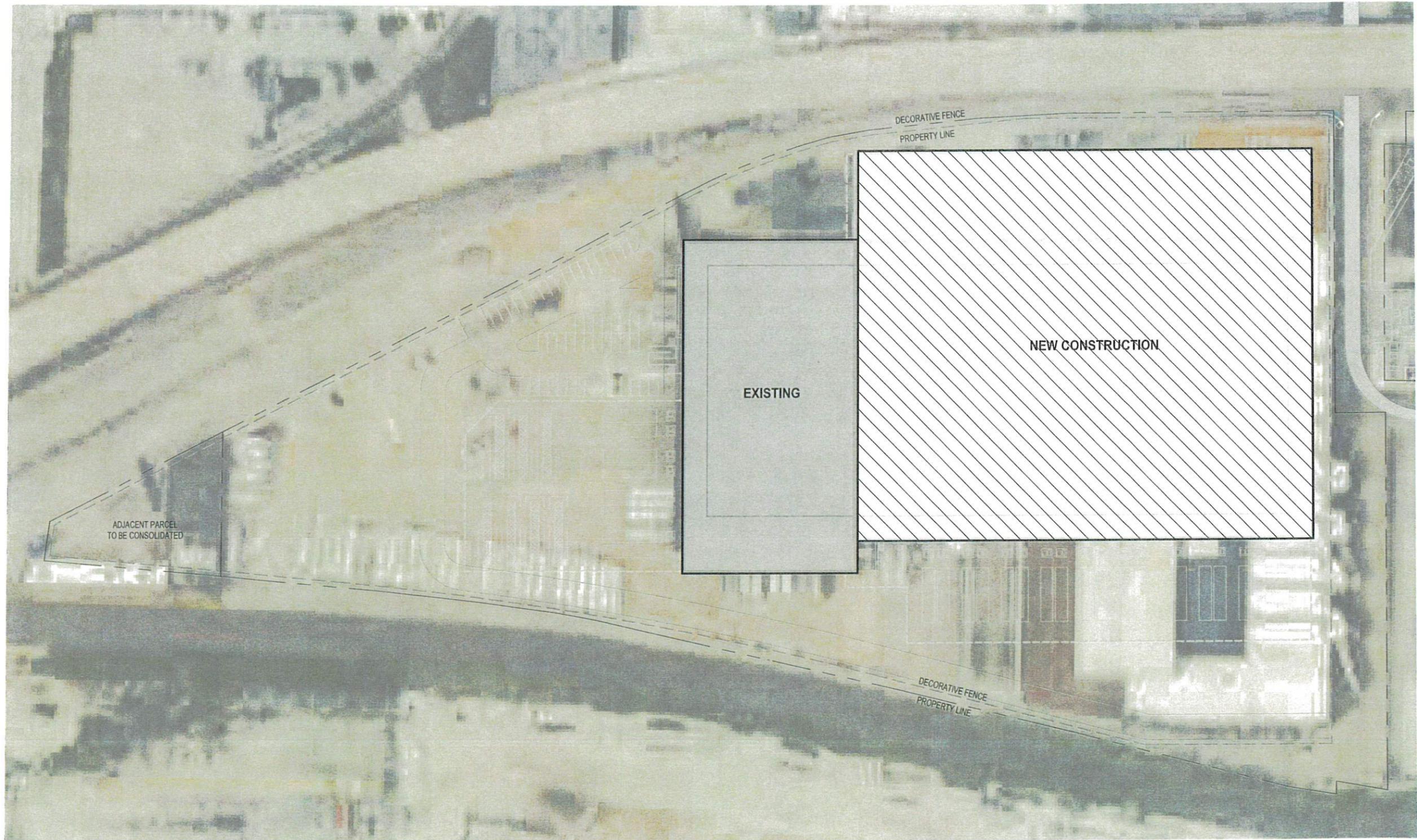
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NOT FOR CONSTRUCTION

SCALE:
1"=100'



01.2



AREAS
 DATA CENTER 525,000 SF

PARKING REQUIRED
 DATA CENTER 5 Stalls

PARKING
 WEST LOT 50 Stalls
 EXCESS PARKING 45 Stalls

TITLE: SITE PLAN - DATA CENTER

DATE: 02.03.2026

PROJECT: ST LOUIS ARMORY

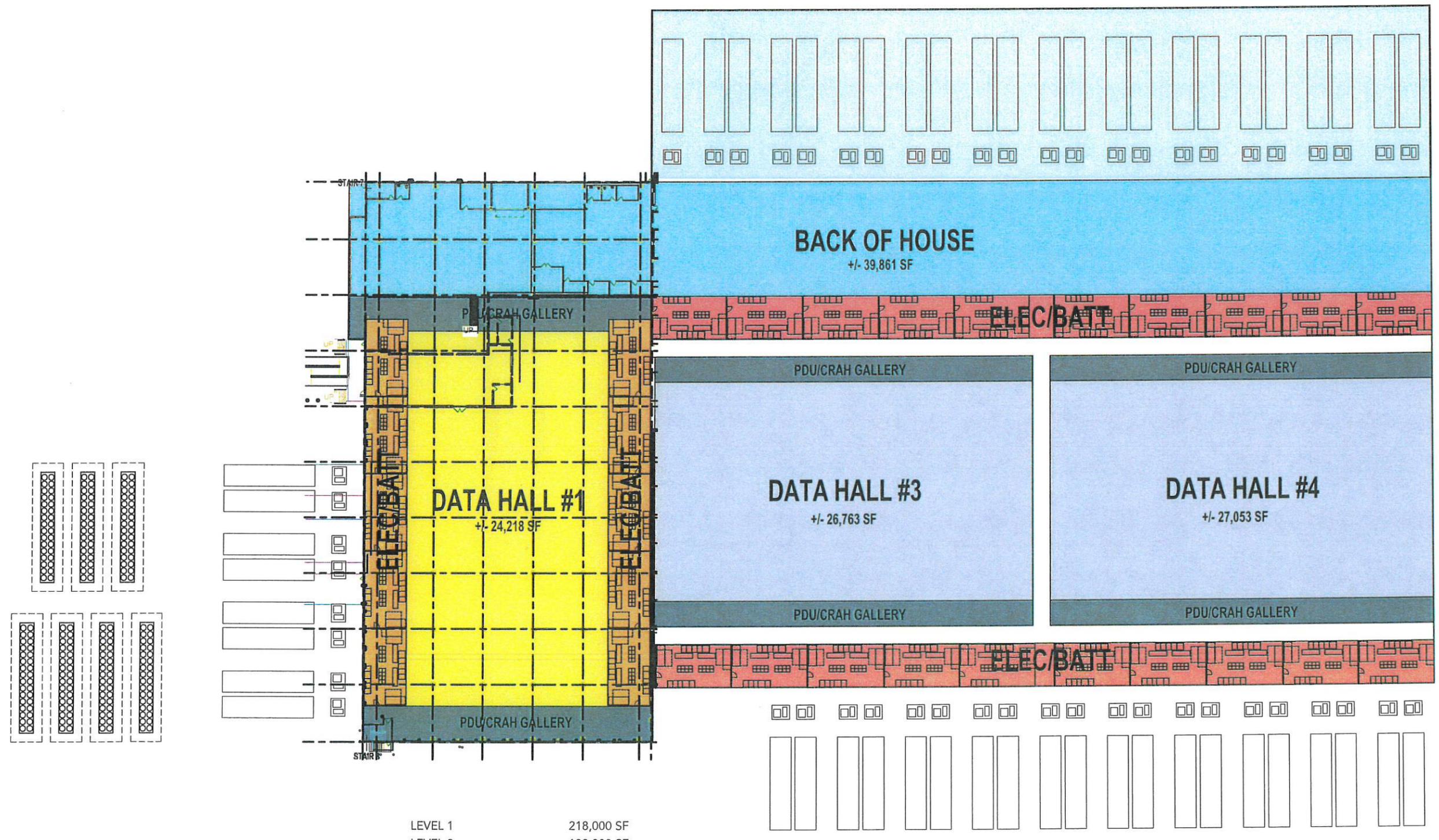
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01.4

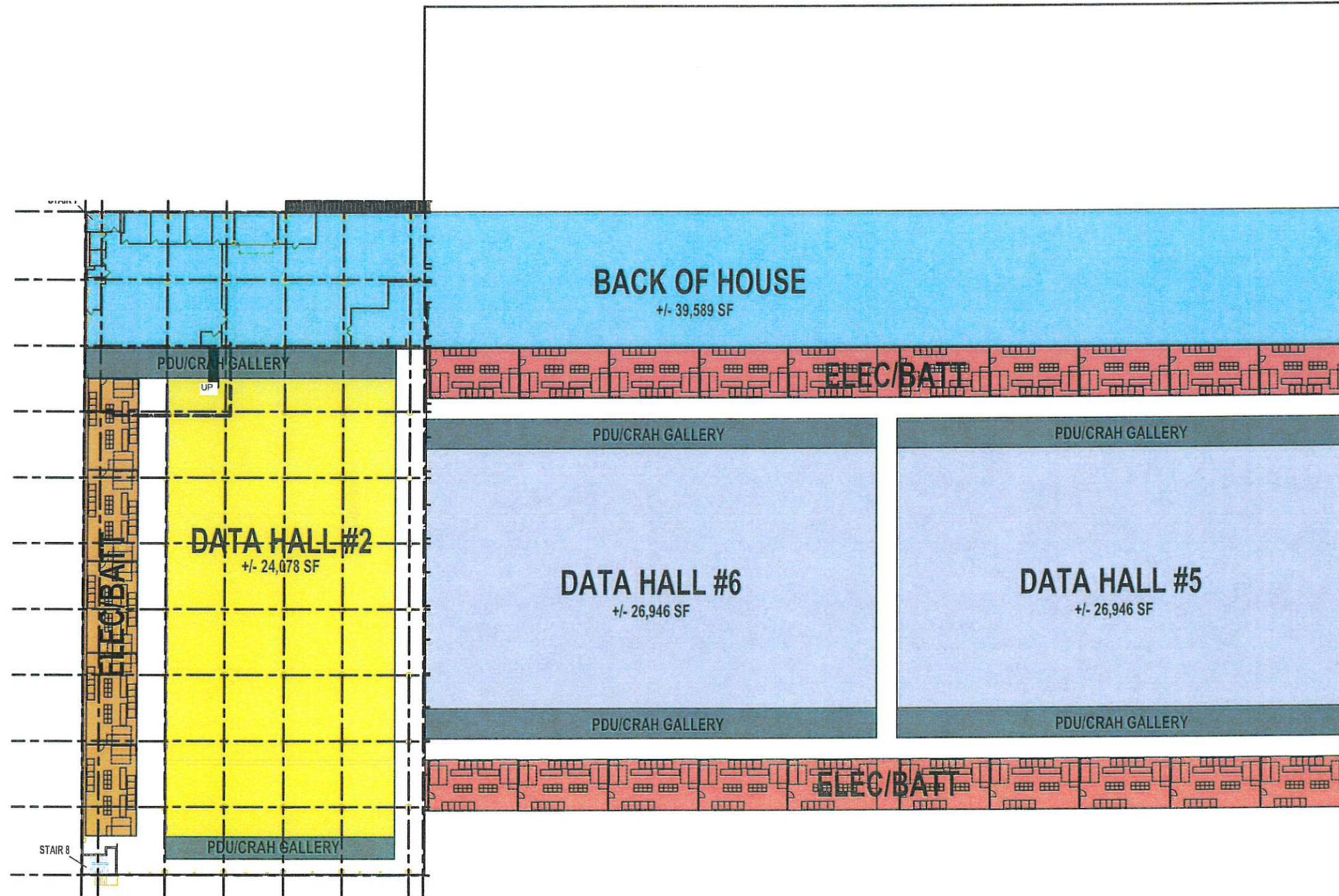


LEVEL 1	218,000 SF
LEVEL 2	180,000 SF
LEVEL 3	127,000 SF
TOTAL	525,000 SF

EMPLOYEES 50 PERSONS
 PARKING REQUIRED 5 STALLS

TITLE: PLAN - DATA CENTER LEVEL 1
DATE: 02.03.2025
PROJECT: ST LOUIS ARMORY
ADDRESS: ST LOUIS, MISSOURI

NOT FOR CONSTRUCTION
 SCALE: 1"=40'
 0' 20' 40'  **04A**



LEVEL 1	218,000 SF
LEVEL 2	180,000 SF
LEVEL 3	127,000 SF
TOTAL	525,000 SF

EMPLOYEES 50 PERSONS
 PARKING REQUIRED 5 STALLS

TITLE: PLAN - DATA CENTER LEVEL 2

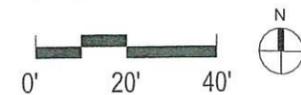
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PROJECT: ST LOUIS ARMORY

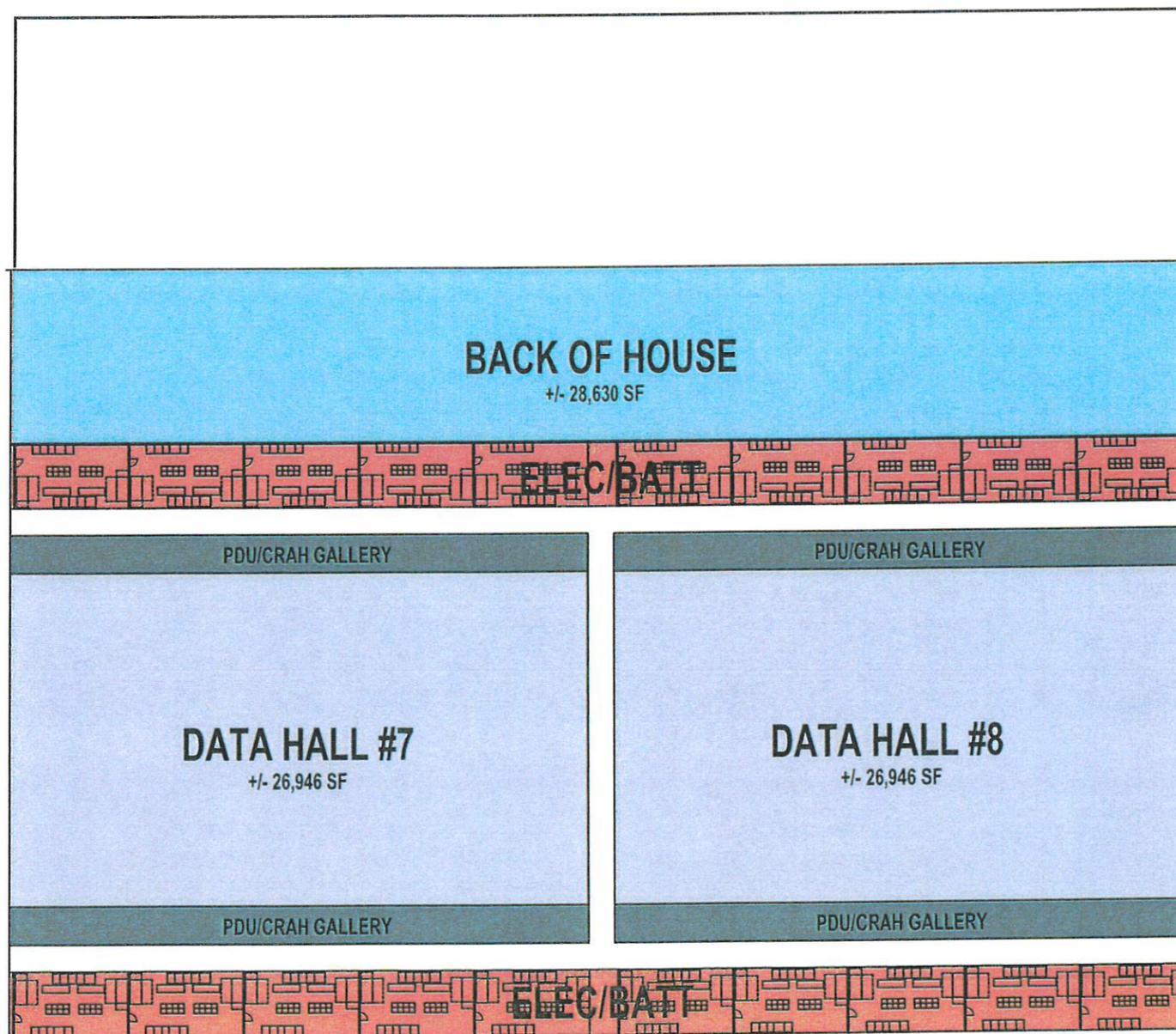
ADDRESS: ST LOUIS, MISSOURI

NOT FOR CONSTRUCTION

SCALE:
1"=40'



04B



LEVEL 1	218,000 SF
LEVEL 2	180,000 SF
LEVEL 3	127,000 SF
TOTAL	525,000 SF

EMPLOYEES 50 PERSONS
 PARKING REQUIRED 5 STALLS

TITLE: PLAN - DATA CENTER LEVEL 3
DATE: 02.03.2025
PROJECT: ST LOUIS ARMORY
ADDRESS: ST LOUIS, MISSOURI

NOT FOR CONSTRUCTION

SCALE: 1"=40'



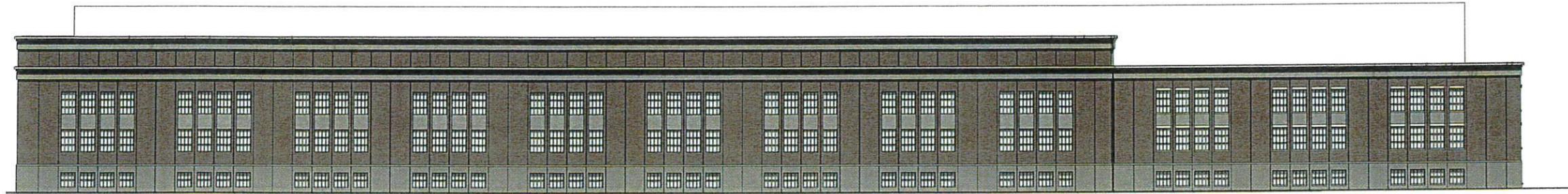
04C

T.SCREEN
EL +74'
T. CORNICE
EL +62'

LEVEL 3
EL +40'

LEVEL 2
EL +20'

LEVEL 1
EL +0'



DATA CENTER - NORTH

ROOF
EL +50'

LEVEL 2
EL +16'

LEVEL 1
EL +0'

T.SCREEN
EL +74'
T. CORNICE
EL +62'

LEVEL 3
EL +40'

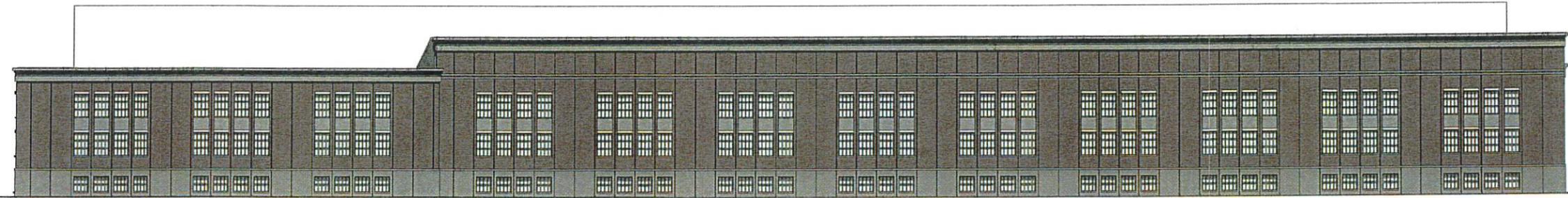
LEVEL 2
EL +20'

LEVEL 1
EL +0'

ROOF
EL +50'

LEVEL 2
EL +20'

LEVEL 1
EL +0'



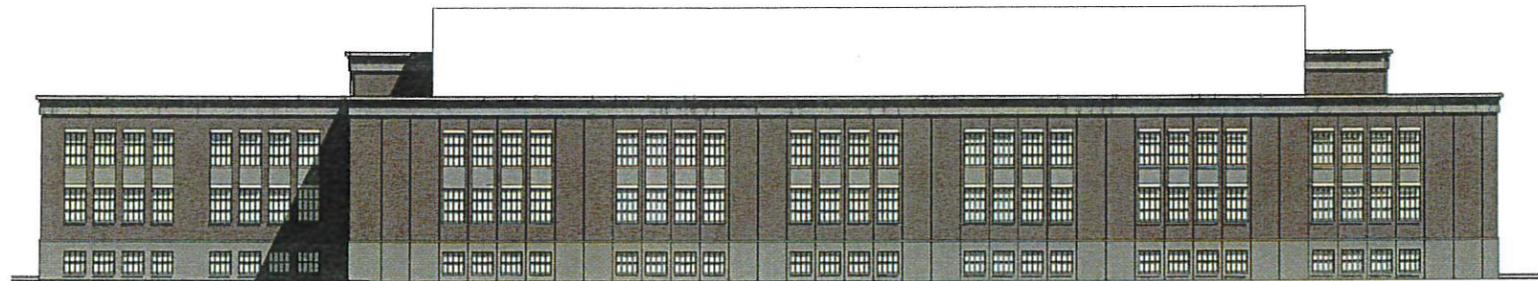
DATA CENTER - SOUTH

T.SCREEN
EL +74'
T. CORNICE
EL +62'

LEVEL 3
EL +40'

LEVEL 2
EL +20'

LEVEL 1
EL +0'



DATA CENTER - WEST

ROOF
EL +50'

LEVEL 2
EL +16'

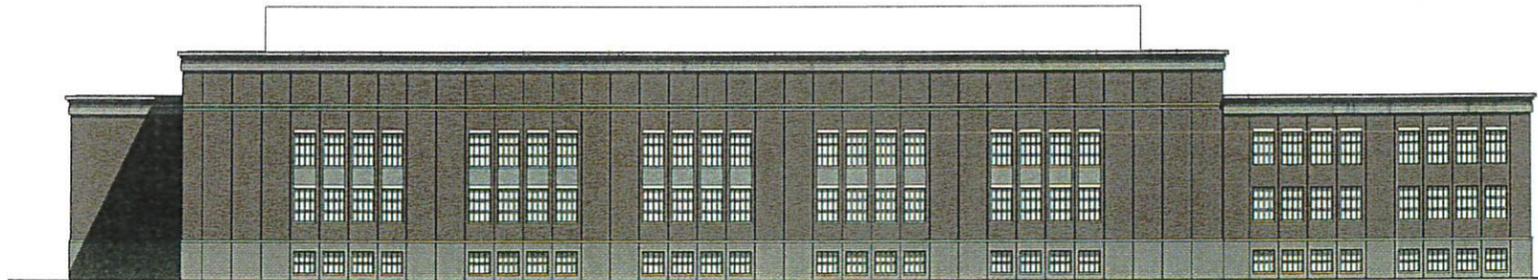
LEVEL 1
EL +0'

T.SCREEN
EL +74'
T. CORNICE
EL +62'

LEVEL 3
EL +40'

LEVEL 2
EL +20'

LEVEL 1
EL +0'



DATA CENTER - EAST

ROOF
EL +50'

LEVEL 2
EL +16'

LEVEL 1
EL +0'

TITLE: ELEVATIONS
DATE: 02.03.2025
PROJECT: ST LOUIS ARMORY
ADDRESS: ST LOUIS, MISSOURI

NOT FOR CONSTRUCTION

SCALE:
1"=50'



05

