



Dear County Executive Fitzwater,

This letter is to express our concerns with the **Investing in Workers and Workplaces advisory group**. Based on the somewhat misleading name of the group and the description of its goals, there are missing voices. In addition to increasing land designated for economic development, part of the stated goal for this group includes "... housing availability, transportation access, and educational/training opportunities". Given the word **workers** in the title of the group, and the above references to transportation and education, we find it puzzling that voices in transportation and job training are lacking from the advisory group.

Second, we are concerned that the composition of the group is predominantly developers. Out of 14 members, 10 are developers or entities related to the development industry. We understand that economic development is important to the County. However, the group as currently constituted cannot give a balanced analysis, and any recommendations are likely to reflect this bias. We encourage you to include a more diverse set of voices in this discussion, including members with land use expertise and knowledge who are not developers, and to make all meetings and recommendations from this group available to the public.

Finally, we believe the formation of this group prior to the establishment of the Green Infrastructure Plan is highly problematic. The stated goal of the plan is to increase county land designated for economic opportunity. This current sequence places protection of our natural resources at a significantly lower priority relative to development. We request that the Green Infrastructure Plan be established prior to further discussion of land designation.

Thank you for your consideration.

Sierra Club Catoctin Group



Friends of Rural Roads



September 16, 2024

Frederick County Executive Fitzwater
Frederick County Council Members
Frederick County Planning Commission

Dear County Executive Fitzwater, Council Members, and Planning Commissioners:

We, the undersigned, believe that the Investing in Workers and Workplaces (IW2) effort is bad planning and is a bad precedent for future planning. It repeats past practices that were developer-driven, shunned citizen participation, ignored principles of good government, and sacrificed community values.

Wise land use decisions are based, not on priorities of special interest groups like developers and data centers, but on open, comprehensive, and unbiased analysis. Land use should provide the highest net benefits to the county at the least cost to residents. The Livable Frederick planning process was designed to secure this objective.

County residents pay dearly for misguided development. We face, for example, higher electricity bills, reduced property values, and damaged environments from the Maryland Piedmont Reliability Project (MPRP), an effort intended to bring power to data centers, principally in Northern Virginia but also in Frederick County.

The power line proposal has been a “hurry-up” project, in an obvious attempt to avoid careful scrutiny. The IW2 plan has been rushed in the same way, seemingly so that county residents and taxpayers do not get the full picture of its impacts. IW2 also contradicts the primacy of the Green Infrastructure plan and other important elements of the Livable Frederick Master Plan. IW2 seems to be an attempted end run around the county’s proper land use planning process.

The IW2 Advisory Group’s discussions centered on increased development, profit, and revenue; they gave little concern to workers’ issues. This focus is unsurprising, given that 10 of the 14 members of the Advisory Group are developers, commercial real estate agents, or people who work for them. They dismissed agricultural and resource conservation areas, as being “underperforming” rather than being essential for food production, water and air quality, carbon storage and sustainability. The County’s agricultural Priority Preservation Areas and Rural Legacy Areas were said to be “in the way” of intense development.

The County should prioritize redevelopment of existing underutilized commercial and industrial sites rather than looking to rezone and develop greenfield areas currently designated for agriculture (AG) and resource conservation (RC). The County's fields and forests are treasures that help to make Frederick County a desirable place to live and work.

We, the undersigned, call on Frederick County government to:

- 1) Halt the IW2 planning process, pending a thorough reconsideration of its objectives, the composition of the Advisory Group, and the inappropriate focus on 'greenfield development.'
- 2) Immediately commence work on the long overdue, LFMP mandated, Green Infrastructure Plan.
- 3) Immediately codify the recommendations of the County Executive's Data Center Workgroup, before any county-wide, massive land use changes are undertaken to facilitate data center development.

We look forward to your earliest reply,

Signed, in the public interest,

Sugarloaf Alliance
Maryland Legislative Coalition
Friends of Rural Roads
Citizens for Responsible Growth
Fellowship of Scientists and Engineers
Montgomery Countryside Alliance
Climate Change Working Group of Frederick County
Sugarloaf Citizens Association
Cleanwater Linganore Inc
Climate Communications Coalition
Envision Frederick County
Hall's Choice Farm Ltd
Audubon Society of Central Maryland

Shaun Howard
16 Bush Cabin Court
Parkton, MD 21120
smhowardkb@gmail.com

September 17, 2024

Frederick County Council
12 East Church Street
Frederick, MD 21701

Frederick County Government
Division of Planning & Permitting
Deborah A. Carpenter, AICP, Division Director Livable Frederick Planning & Design Office
Kimberly Gaines, Livable Frederick Director
Denis Superczynski, Planning Manager, Livable Frederick
30 North Market Street
Frederick, MD 21701

Subject: Letter Regarding Investing in Workers & Workplaces and Zoning Discussion

Dear Members of the Frederick County Council and Division of Planning and Permitting,

I am writing to express my strong concern to the land use and possible proposed zoning changes that would facilitate the development of data centers and other high-power demanding workloads in Frederick County, particularly in areas such as the Sugarloaf Treasured Landscape, Jefferson Pike, Mount Phillip, Mount Zion, New Design, Ballenger Creek, and Quantum area that is related to the Investing in Workers & Workplaces Zoning matter. While I may not be a Frederick County Resident, I am a fellow Marylander, and your decisions impact all Marylanders. The lack of planning for critical infrastructure to support such facilities has been vastly overlooked, in addition the proposed changes represent a significant shift that threatens not only the county's environmental and aesthetic values, but also its long-term economic and community welfare that will impact all Marylanders.

Environmental and Aesthetic Concerns

Frederick County's natural landscapes and rural charm are central to its identity. The introduction of large-scale data centers, such as those planned by Quantum Loophole, poses a risk to this identity. Quantum Loophole's 2,100-acre data center park in Adamstown exemplifies the scale of change proposed. This project, touted as the world's first multi-tenant gigawatt data center campus, will involve substantial infrastructure, including a 43-mile fiber conduit system, and will significantly impact the surrounding environment.

Data centers, particularly those on the scale proposed, consume vast amounts of electricity and water. They rely heavily on diesel generators during power outages, exacerbating air pollution. The proposed zoning changes would facilitate the expansion of such facilities into areas currently valued for their natural beauty and agricultural productivity. This expansion could irreversibly alter the landscape and diminish the quality of life for residents who value the county's scenic and rural character.

Steve Black, president of the Sugarloaf Alliance, has rightly expressed concerns about the detrimental effects of data centers on the Sugarloaf Treasured Landscape. The area's rolling hills, agricultural lands,

and natural beauty are integral to Frederick County's identity. Shifting to industrial zoning in these areas would undermine efforts to preserve these valued landscapes.

The Sugarloaf area, including the picturesque farmland and the popular Sugarloaf Mountain, is cherished by the community for its natural beauty and recreational opportunities. The recent rejection of zoning overlays intended to protect this landscape is deeply troubling. Such overlays would have been crucial in safeguarding against the intrusion of industrial development into these sensitive areas, especially given the recent attempts by developers to push for data centers in the region.

Economic and Planning Considerations

The Investing in Workers & Workplaces Advisory Group, in its meeting on July 23, 2024, discussed the need for a balanced approach to land use that aligns with the county's long-term goals. While data centers can generate significant tax revenue, they provide very little jobs, they also demand substantial infrastructure and can lead to unanticipated environmental costs. The Advisory Group emphasized that development should be strategic and consider both immediate benefits and long-term implications.

Quantum Loophole's project exemplifies the scale of development proposed. The company is set to deploy individual data center modules of 30-120 MW capacity, with the first facilities anticipated to be operational by early 2024. Notably, the lack of planning for critical infrastructure to support such facilities has been vastly overlooked. The park's infrastructure, including power distribution and fiber optics, will be substantial, indicating a massive shift in land use that may not align with Frederick County's sustainable development goals.

Moreover, the recent decision by the Frederick County Council to reject zoning overlays intended to protect the Sugarloaf Treasured Landscape is troubling. Conservationists, including Steve Black and other local groups, have expressed deep concerns about the impact of such developments. The area's zoning has traditionally supported agricultural, and conservation uses, but developers have been seeking to alter these designations to accommodate large data centers. The county's recent approval of comprehensive land use plans without additional protective measures means development opponents must remain vigilant.

Lessons from Other Regions

The experience of Northern Virginia provides a cautionary tale. Loudoun County, with its dense concentration of data centers, has faced numerous challenges, including strained infrastructure and diminished community amenities. Supervisor Mike Turner's recent proposals highlight the pressing need for innovative solutions, such as on-site power generation, to address the challenges posed by data centers. Turner's proposal to shift towards microgrids and on-site power generation aims to reduce reliance on the grid and mitigate the need for additional transmission lines, reflecting the significant infrastructure demands that accompany data center expansion.

In Maryland, the demand for data centers has surged due to the pandemic-induced spread of cloud, remote work and content streaming, and now on the not-so-distant horizon with artificial intelligence in everything. However, conservationists and local officials, including those from Frederick County, caution against unbridled development. The Maryland General Assembly's tax exemptions and recent regulatory proposals have made the state attractive to data center developers, but these incentives must be carefully weighed against potential environmental impacts. The county has an opportunity to learn from the experiences of Loudoun County and ensure that its approach to data center development is thoughtful and sustainable.

Recommendations

To address these concerns and align with the county's goals for sustainable development, I propose the following solutions and introduction of new ordinances:

1. **Mandatory Clean Energy and Critical Infrastructure In-Place Prior to Construction**
Requirements: Implement a policy requiring that any data center or high-power demanding commercial facility exceeding a specified megawatt (MW) threshold, possibly 10-20MW, must provide its own clean energy source, while at the same time connecting to the grid to provide power to the grid and general population, and for funding this needs to be done at a majority 99% of their expense, and must go through the standard FERC, PJM/RTO, and PSC approval processes. This could include on-site renewable energy generation such as solar panels or wind turbines that are affixed to the building with battery energy storage solutions, however, the key with these too would be to not take any addition land and incorporate into the building itself through the roof-top, façade, and windows. The other option of course would be nuclear solutions including advanced safe nuclear technologies and possibly small modular reactors. The other option could be a green hydrogen solution. This requirement would help mitigate the environmental impact associated with high energy consumption and reliance on diesel generators.
2. **Rehabilitation of Underutilized Properties:** Focus on redeveloping existing underutilized properties and vacant commercial sites rather than opening new land for industrial use. This approach can help meet commercial growth targets while preserving valuable land and reducing urban sprawl.
3. **Enhanced Environmental Protections:** Strengthen zoning overlays and land use regulations to protect sensitive areas such as the Sugarloaf Treasured Landscape. Ensure that any new developments in these areas undergo rigorous environmental reviews and adhere to stringent conservation standards.

Given these concerns, I urge the Frederick County Council and the Frederick County Government Division of Planning & Permitting, to reconsider the proposed zoning changes. The council and planning offices should prioritize land use strategies that protect natural landscapes, preserve agricultural lands, and ensure sustainable growth. It is crucial to evaluate the long-term effects of data center development and consider alternatives that align with the county's vision for a balanced and sustainable future.

Public outreach meetings scheduled for September offer an opportunity for residents to voice their concerns and for the Council and Planning & Permitting Division to engage with the community. I strongly encourage active participation in these discussions, listening to the concerns of residents, and carefully weighing the implications of the proposed zoning changes.

Thank you for considering my perspective on this critical issue. I hope the Frederick County Council and the Frederick County Government Division of Planning & Permitting will take a proactive stance in preserving the unique character and natural beauty of Maryland.

Sincerely,

Shaun Howard

From: Denny Remsburg <dremsburg52@gmail.com>
Sent: Wednesday, September 18, 2024 8:44 PM
To: Planning Commission
<PlanningCommission@FrederickCountyMD.gov>
Subject: Investing in Workers and Workplaces workgroup

[EXTERNAL EMAIL]

Planning Commision members,

I am attaching a letter from the Frederick County Farm Bureau expressing our disappointment with the entire process of the 'Investing in Workers and Workplaces' workgroup. The FCFB feels that agriculture was an afterthought throughout the process and was never recognized as a contributing member of the group. Refer to the letter for our position.

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Denny Remsburg



“The Voice of Organized Agriculture”

September 18, 2024

Frederick County Planning Commission:

We are writing to you in response to the County workgroup “Investing in Workers & Workplaces”. As the Farm Bureau representative and the only member of the agriculture industry and as president we are deeply disappointed with the efforts made by the county and the workgroup members.

The initial concern with the construction of the workgroup was the potential conflict of interest that existed with committee members. Initially the agricultural industry, which is the largest industry in Frederick County, was ignored and left out of the workgroup.

There was no effort to discuss workforce development or education. The need for training in skilled trades was ignored as well as funding or prioritizing education at the high schools, career and tech center or community college.

There was a lack of public participation including hearing from any “workers” in the county. By limiting public comments, we lost the opportunity to hear from this target group that is in the title of the workgroup. The meetings were not recorded or broadcast to the public which removes any accountability and promotes an overall lack of transparency.

Another major concern was the “clean slate” mapping exercises that were encouraged by staff disregarding current county policy, land use designations, environmental concerns and previous planning efforts. It also ignored small area planning efforts which are community focused thereby diminishing citizens participation.

Every meeting focused on upzoning land and identifying possible locations where large tracts could be obtained. However, the need for this mass land grab was never discussed or any reasoning to why drastic changes were necessary. The assumption from county staff that the industrial tax base needed to increase did not take into account the build out of the former Eastalco property and its influence on county income, which coincidentally was the only positive that the data center workgroup could attribute to the CDI industry. The push for large industrial growth would negatively impact local resources, increasing consumption and exacerbating the ongoing controversy surrounding transmission lines.

The group discussed the destruction of agricultural preservation programs. It promoted actions that would diminish the value and integrity of the programs as well as risking the availability to farmers and greatly impacting future generation’s ability to farm. There was a complete lack of concern that agriculture in Frederick County would continue to thrive or even survive in the near future, showing an ignorance to the importance of our industry

to the county and its citizens.

With most of the land in the county zoned Agricultural or Resource Conservation, we feel that agriculture was grossly underrepresented on this workgroup and would recommend a new workgroup be drafted with more equitable representation for those that will be affected by the recommendations of this workgroup.

Respectfully,

Brian Sweeney
Frederick County Farm Bureau
Investing in Workers & Workplaces workgroup

Denny Remsburg
Frederick County Farm Bureau
President

Smarter Growth Alliance for Frederick County

Local and state organizations working to engage residents and policy makers in support of wise land use.

July 23, 2024

To: County Executive Fitzwater

The undersigned members of the Frederick County Smarter Growth Alliance write in regard to the **"Investing in Workers and Workplaces"** (IWWAG) advisory group that you recently appointed. We understand that all county comprehensive plan land use designations and zoning have been placed "on the table" for review by this Group, with the intention of identifying additional county land for residential, business and/or industrial expansion.

From the Frederick County website:

"This plan – undertaken in partnership with the Division of Economic Opportunity – will increase land designated for targeted economic opportunity uses through the review of select growth areas and current land use designations. Critical factors that influence economic success in a community, such as housing availability, transportation access, and educational/training opportunities, will also be considered. The Plan will ensure these new or re-tooled employment growth areas maintain a sense of place and are a positive investment for the entire County, while meeting the needs of workers and employers. A comprehensive rezoning will follow Plan adoption to implement the Plan's recommendations."

This effort appears to be similar in scope to a Livable Frederick small area plan, but without some of the process elements that we consider important. For example, there is no community outreach built into this process to notify county residents, and the composition of the group lacks the appropriate diversity of stakeholder participants.

According to the Planning and Permitting Office, the soon-to-be-completed Water Resources Element was to be immediately followed by a Green Infrastructure Plan as described in Livable Frederick. The creation of the IWWAG ahead of the Green Infrastructure Plan appears to give the green light to development and industrial expansion, before establishing protection for environmentally sensitive areas. This jeopardizes not only public health, clean drinking water, and the considerable investment the County has made in farmland protection, it discounts the local impacts of both climate change (heat/drought) and loss of biodiversity that are critical to sustaining our local environment.

Additional concerns include:

- There is no opportunity for public comment. Until July 9th, when a Microsoft Teams option was offered, the meetings were neither televised nor recorded. The Sugarloaf and South Frederick Corridor plans had their advisory and scoping group meetings recorded and both took public comments early in their drafting.
- At least one of the members of the Advisory Group owns, but does not reside on significant acreage currently zoned Agricultural that if rezoned to Commercial or Industrial could provide the owner a considerable profit.

We recommend that support of IWWAG recommendations be withheld and further development of this plan be paused, until a Green Infrastructure plan is approved and implemented. Once the functions of our local ecosystems are protected, the County will be in a position to identify where and how to accommodate the unprecedented growth that we are experiencing now and into the foreseeable future. This would be fair to the citizens of Frederick County. We look forward to your response.

Signed, in the public interest,

Climate Change Working Group of Frederick County
Envision Frederick County
Sugarloaf Alliance
Cleanwater Linganore, Inc.
Potomac Riverkeepers
Fellowship of Scientists and Engineers
Citizens for Responsible Growth
Friends of Rural Roads
Board of Trustees of the Unitarian Universalist Congregation of Frederick
Central Maryland Heritage League
Plant the Light
Montgomery Countryside Alliance

cc. Frederick County Council, Frederick County Planning Commission, Kim Gaines, Andrew Stine, Denis Superczynski

From: Mark W Faris <mwfarris@prodigy.net>
Sent: Tuesday, September 24, 2024 2:06 PM
To: Constituent Services <constituentservices@FrederickCountyMD.gov>; Council Members <CouncilMembers@FrederickCountyMD.gov>; Planning Commission <PlanningCommission@FrederickCountyMD.gov>
Subject: COMMENT - Investing in Workers and Workplaces

Please review all attachments concerning the 'Investing in Workers and Workplace' committee.

Thank you...

Mark Faris

QUESTIONS / RECOMMENDATIONS

Investing in Workers and Workplaces *Working Committee*

- What was the specific data set used when determining Frederick County needed to increase its commercial sector?
 - Please specifically describe this data set in detail.
- Why does the Planning Department, specifically the Livable Frederick Planning Division, believe that having a more robust commercial sector would take pressure off the taxes Frederick County citizens face? (*this was stated at the last meeting*)
 - Please present specific examples of where an increased commercial sector has provided relief to overtaxed citizens.
- Were there 'pros and cons' used when discussing this plan?
 - If so, what were they, and can you please provide them in detail with specifics?
- Stated in the first I2W meeting "*This isn't a plan about Data Centers, but Data Centers are included*".
 - How much of the plan is about Data Centers, and specifically how many possible Data Center constructions are included?
- The construction of Data Centers should be a statewide planning issue, not a County one.
 - The impact of Data Center deployment(s) in Frederick County will be felt by multiple States in the Region;
 - There is not enough energy generation and/or transmission lines near these proposed Data Center campuses to power them.
 - A critical component must be added to planning/permitting requirements i.e., "*The Data Center must provide its own power or an environmental suitable alternative. Colloquially, Bring Your Own Power – BYOP*"
 - Transmission lines will be required to be constructed from energy producing power plants located in Pennsylvania and

West Virginia currently operating on tremendous amounts of coal.

- A County Planning Commission should not have the power to authorize Data Center construction without a Statewide comprehensive and updated planning strategy.
- Data Center construction in Frederick County has already caused extreme environmental harm by releasing thousands of gallons of Bentonite into Frederick County waterways caused by horizontal drilling process.
 - The Quantum Loophole data center site is early in the construction process and already having these problems.
 - Predictably, more data center construction will result in more negative impact to Frederick County's environment.
 - Were any/all environmental issues considered before these plans were approved?
- Data centers in Northern Virginia are using significantly more water than expected and the usage is increasing at a rapid pace.
 - Fresh water is a finite and irreplaceable resource.
 - Were water requirements of Data Centers investigated before these plans were approved?
- Considering the above information, it is painfully clear that if Frederick County plans to allow construction of Data Centers, it must be restricted to land that isn't protected, preserved, or conserved, be cognizant of water utilization requirements and must avoid triggering the need for new intrusive transmission lines.
 - Data Centers must generate their own power (*BYOB*) on the site, and not require energy from the grid.
 - The Data Center planning process must be updated, comprehensive and effectively administered prior to permitting.
 - All impacts to Frederick County must be included in this updated planning process; protected lands, water utilization, energy source proximity and transmission solutions, viewscape, etc.
 - Rigorous oversight must be put in place during the entire construction process
 - County and State Environmental Protection Agencies must be heavily involved during the entire planning, permitting and construction process

- Water cannot be the means used for cooling these Data Centers. Alternatives must be utilized.
 - The water table must be protected from Data Center Developers at all costs
 - Fresh water is a finite and irreplaceable resource.

Date: 24 September 2024

To: Frederick County Executive
Frederick County Council
Frederick County Planning Commission

From: Mark Faris
7690 Talbot Run Road
Mt. Airy, Maryland 21771
Frederick County
443.277.0009

County Officials;

My name is Mark Faris and I am a resident of Frederick County. I attended the first 'Investing in Workers and Workplaces (I2W)' public meeting last Thursday evening. The meeting was well attended with significant comment and concern expressed by most attending, relative to the very limited information and lack of a summarization presented by the facilitators. Most others and I left the meeting with no better understanding of the forthcoming recommendations from the I2W working group, leaving us very frustrated.

Further, the original construct of the meeting offered a brief introduction followed by the group being directed to six break-out tables. This meeting format effectively eliminated any opportunity for attendees to share their questions and concerns with their neighbors, and hear immediate feedback from government leadership about their suggestions. I intervened, requesting the moderator to reconsider the original meeting plan to allow for dialog between residents and staff. Graciously, the moderator agreed and we thank him for it. The open forum was appreciated by all attendees, and they were allowed to speak to the staff and the group assembled.

Many attended the session to voice their concerns over re-zoning of lands, implementation of green initiatives, and the impact to beautiful Frederick County. While I share their concerns, I also personally feel that there appears to be an aggressive push to entice significant and swift data center construction to the County without: thorough and thoughtful planning consideration; limited

understanding of the comprehensive impact; outdated data center planning guidelines, and the fact that if approved and constructed any/all damage to our distinctly unique County cannot be undone. If accepted as proposed, we will see large buildings built, large parcels of land repurposed, water challenges, and view-scape destruction including obtrusive high voltage transmission power lines required to provide energy to the data centers.

My overriding fear is that without comprehensive understanding and **current knowledge of data center planning/approval guidelines**, Frederick County will quickly become the mess that is Loudoun County, Virginia today.

I have attached to this letter eighteen documents, all written in 2024, concerning the risks, hazards and concerns for a County to be aware of if they find themselves targeted by data centers. On the surface, data centers appear to be a good way to bring clean new industry with significant revenue for the County. But at what cost to the residents, and the lands and the culture of Frederick County? Particular note should be given to the document explaining how Prince William County, Virginia handled this issue.

Also attached are initial questions I have concerning the Investing in Workers and Workplace working committee efforts.

I encourage you to review these files as you wrestle with the data center conundrum. The future of Frederick County will be heavily impacted by your decisions on data centers.

Please add this letter and the attached documents into the public record on this matter.

Thank you

Mark Faris

Data Center Research

Links to Informational Articles About Data Centers	Title
https://serverlift.com/blog/data-center-challenges/	9 Challenges That Data Centers Are Facing Now
https://stateline.org/2024/04/30/states-rethink-data-centers-as-electricity-hogs-strain-the-grid/	States rethink data centers as 'electricity hogs' strain the grid
https://www.datacenterfrontier.com/energy/article/33038765/what-the-cloud-revolution-tells-us-about-data-center-power-challenges	What the cloud revolution tells us about data center power challenges
https://www.energy.gov/policy/articles/clean-energy-resources-meet-data-center-electricity-demand	Clean energy resources to meet data center electricity demand
https://www.whitecase.com/insight-our-thinking/constructing-low-carbon-economy-data-centers-demands	Data centers: can the demands for increased capacity and energy be met sustainably?
https://insights.jefferies.com/the-big-picture/how-data-centers-are-shaping-the-future-of-energy-consumption	How Data Centers are shaping the future of energy consumption
https://theconversation.com/ai-supercharges-data-center-energy-use-straining-the-grid-and-slowing-sustainability-efforts-232697	AI supercharges data center energy use-straining the grid and slowing sustainability efforts
https://time.com/6987773/ai-data-centers-energy-usage-climate-change/	How AI is fueling a boom in Data centers and energy demand
https://wginc.com/policy-puzzle-regulating-virginia-data-centers/	Policy Puzzle: Decoding urban and community planning laws- regulating virginia data centers
https://www.cbre.com/insights/reports/global-data-center-trends-2024	Global data center trends 2024: Limited power availability drives rental rate growth worldwide
https://www.datacenterknowledge.com/energy-power-supply/america-is-running-out-of-power-are-data-centers-to-blame	America is running out of power, are data centers to blame?
https://www.dlapiper.com/en-gl/insights/publications/2024/09/chicago-advances-ordinance-mandating-data-center-impact-study	Chicago advances ordinance mandating data center impact study
https://www.mckinsey.com/industries/private-capital/our-insights/how-data-centers-and-the-energy-sector-can-sate-ais-hunger-for-power	How data centers and the energy sector can sate AI's hunger for power
https://www.nbcwashington.com/news/local/23-hour-meeting-ends-with-prince-william-planning-commission-vote-against-data-center-recommendation/3467079/?amp%3Bref=app&os=vbk42tqhopnxgo4ij	23+ hour meeting ends with Prince William County Virginia planning commission vote against data center recommendation
https://www.simmons-simmons.com/en/publications/cluuzeox800hyuacw3kkq0xs/top-10-issues-in-data-centres	Top 10 issues for data centres
https://www.team-prosource.com/top-issues-facing-data-centers-challenges-and-solutions/	Top issues facing data centers: challenges and solutions
https://www.transect.com/blog/10-key-factors-to-consider-when-siting-a-data-center	10 key factors to consider when siting a data center

From: Susan Gordon <segmessages@gmail.com>
Sent: Wednesday, September 25, 2024 12:55 AM
To: Council Members <CouncilMembers@FrederickCountyMD.gov>; County Executive <CountyExecutive@FrederickCountyMD.gov>
Subject: IW2 Public Meeting

My name is Susan Gordon, a citizen of Frederick County, and I would like to extend a sincere thanks to our County Council and County Executive for your letter recommending a slower process before moving forward with the MPRP.

I would like to remind you of the IW2 Public Meeting at 2 pm tomorrow at 585 Himes Ave. A number of Republican council members will be attending the meeting. Thank you.

As a deeply blue and progressive Democrat, I would like to encourage the Democrats on the Council to also attend to listen to public comment and concerns. I was so pleased with your strong bi-partisan efforts recently, and I would love to see that to continue.

It is that bipartisanship that we so desperately need in this country. The concerns being expressed at this meeting speak to people of every persuasion, as we try to hold our county whole against ravenous data center greed that will harm us all.

Thank you,

Susan Gordon

Frederick County Resident Input
for
Investing in Workers and Workplace Committee

25 September 2024

Submitted by – Mark Faris, Frederick County Resident

This is my initial formal submittal is for the record and is intended to offer guidance to the '*Investing in Workers and Workplace (I2W)*' Committee. The following information should be used by the I2W Committee prior to submitting a final report and recommendations to the Planning Commission for consideration concerning rezoning of any portion of Frederick County lands.

▪ Foundational Considerations

- Protected lands, Historical Properties, Conservation Easements will not be affected by any change in zoning.
- Water availability and any potential for contamination by Data Center siting will be evaluated before any new zoning change considered.
- Current site-specific energy availability must be evaluated.
- All energy augmentation plans triggered by any data center siting will be reviewed to confirm no impact at the specific site and across all of Frederick County. (*I.e. new transmissions lines*)

▪ Understand the Data Center Industry

(Sourced From attached Data Center Research List)

- A continued worldwide power shortage is significantly inhibiting the global data center market's growth. Sourcing power is a top priority for operators across all regions (North America, Europe, Latin America and Asia-Pacific). Secondary markets with ample power should attract more data center investment.
- North American data center vacancy rates hit new lows across major markets. Chicago led again with the biggest year-over-year decrease to 2.4% from 6.7%. Northern Virginia's vacancy rate decline closely followed, dropping to 0.9% from 1.8% the year prior despite an 18% increase in inventory over the same period.

- Northern Virginia needs the equivalent of several large nuclear power plants to serve all the new data centers planned and under construction
- The soaring demand is touching off a scramble to try to squeeze more juice out of an aging power grid while pushing commercial customers to go to extraordinary lengths to lock down energy sources, such as building their own power plants.
- Communities that had little connection to the computing industry now find themselves in the middle of a land rush, with data center developers flooding their markets with requests for grid hookups. Officials in Columbus, Ohio; Altoona, Iowa; and Fort Wayne, Ind. are being aggressively courted by data center developers. But power supply in some of these second-choice markets is already running low, pushing developers ever farther out, in some cases into cornfields, according to JLL, a commercial real estate firm that serves the tech industry.
- Grid Strategies warns in its report that “there are real risks some regions may miss out on economic development opportunities because the grid can’t keep up.”
- “Across the board, we are seeing power companies say, ‘We don’t know if we can handle this; we have to audit our system; we’ve never dealt with this kind of influx before,’ ” said Andy Cvengros, managing director of data center markets at JLL. “Everyone is now chasing power. They are willing to look everywhere for it.”
- When the data center industry began looking for new hubs, “Atlanta was like, ‘Bring it on,’ ” said Pat Lynch, who leads the Data Center Solutions team at real estate giant CBRE. “Now Georgia Power is warning of limitations. ... Utility shortages in the face of these data center demands are happening in almost every market.”
- “Utilities are not going to be able to move quickly enough to provide all this capacity,” said Christine Weydig, vice president of transportation at AlphaStruxure, which designs and operates clean-energy projects. “The infrastructure is not there. Different solutions will be needed.” Airports, she said, are looking into dramatically expanding the use of clean-power “microgrids” they can build on-site.
- The most likely path forward is a “now and later” strategy in which digital infrastructure undergoes a new round of energy optimization, while moving toward a future with less reliance on public utilities and the power grid.

- While the proliferation of data centers puts more pressure on states to approve new transmission lines, it also complicates the task. Officials in Maryland, for example, are protesting a plan for \$5.2 billion in infrastructure that would transmit power to huge data centers in Loudoun County, Va. The Maryland Office of People's Council, a government agency that advocates for ratepayers, called grid operator PJM's plan "fundamentally unfair," arguing it could leave Maryland utility customers paying for power transmission to data centers that Virginia aggressively courted and is leveraging for a windfall in tax revenue.
- This two-phase approach includes:
 - A new round of facility-level energy optimization, featuring an accelerated transition to liquid cooling, and new server and system designs customized for specific workloads, especially AI.
 - The gradual adoption of on-site energy generation at scale (eventually including nuclear) as well as microgrids and energy storage.
- We are already seeing data center construction shifting into new markets that have power available, including places that have not previously seen large campus developments, like Mississippi (AWS) and Indiana (Google and Meta).
- On-site generation is a hard problem but would provide hyperscalers greater control over the pace of deployments. There's also a wave of startups seeking to address the looming energy gap. An example is this week's launch of Verrus, which plans to build data centers with flexible energy management using microgrids and energy storage.
- The coming shift to on-site generation is "the third wave of data center power," according to industry veteran Dan Golding of Appleby Strategy Group.
- Data centers consume about 3 percent of the world's electricity. This substantial energy consumption is set to increase in the future as more data is stored and processed in data centers.
- Thanks to AI, the electrical grid – in many places already near its capacity or prone to stability challenges – is experiencing more pressure than before. There is also a substantial lag between computing growth and grid growth. Data centers take one to two years to build, while adding new power to the grid requires over four years.
- As a recent report from the Electric Power Research Institute lays out, just 15 states contain 80% of the data centers in the U.S.. Some states – such

as Virginia, home to Data Center Alley – astonishingly have over 25% of their electricity consumed by data centers. There are similar trends of clustered data center growth in other parts of the world. For example, Ireland has become a data center nation.

- Additional challenges to data center growth include increasing use of water cooling for efficiency, which strains limited fresh water sources. As a result, some communities are back against new data center investments.
- The U.S. is at a critical juncture with the explosive growth of AI. It is immensely difficult to integrate hundreds of megawatts of electricity demand into already strained grids. It might be time to rethink how the industry builds data centers.
- Virginia is home to the world's largest concentration of data centers, most of which are in Northern Virginia. This proliferation has raised public concern and increased policy efforts to manage their growth.
- Environmental Concerns – Data centers can consume large amounts of water for cooling and electricity for power, which can contribute to carbon emissions and other environmental issues. Data centers often cover acres of land, which can lead to loss of forest cover, farmland, and wildlife habitat.
- One possibility is to sustainably build more edge data centers – smaller, widely distributed facilities – to bring computing to local communities. Edge data centers can also reliably add computing power to dense, urban regions without further stressing the grid. While these smaller centers currently make up 10% of data centers in the U.S., analysts project the market for smaller-scale edge data centers to grow by over 20% in the next five years.

▪ **Considerations for New Planning/Zoning/Permitting Guidelines For Data Centers**

- Data Centers should not be considered on a single site basis. Reverberating impact across all of Frederick County must be included with every Data Center proposal.
- Data Center planning/approval must utilize a wholistic view, defining any/all impact to Frederick County i.e., water requirements, energy

requirements, aesthetic requirements, sound requirements, environmental requirements, etc.

- Adequate and knowledgeable inspection staff must be in place prior to commencement of construction of a Data Center.
- Data Centers are unique, thus in-depth knowledge is required by any inspector assigned to oversee the project.
- Current County inspection staffing levels must be evaluated to assure adequate staff, with in depth data center knowledge, is available prior to commencement of any Data Center approval/construction.
- Any new Data Center proposal for approval must include the requirement, BYOP (*Bring Your Own Power*).

A SUGGESTED OPTION TO REZONING 10,000 ACRES FOR COMMERCIAL USE

file: Documents; Data Centers; IW2 tax option 9.25.24 revised

The County would like to increase the fraction of its budget from commercial revenue, currently at 22%. No target was named, but a typical figure for other counties is about 28%. IW2's approach has been to find more land for commercial use, and it judges that 8,000 to 10,000 acres, rezoned for commercial use, would provide an acceptable increase. The prospect, however, has caused great concern, and I looked for another way. I didn't have to look far, because the Data Center Workgroup (DCW), in its Final Report, has already started the work. I'm making use of what's in that Report.

My results look reasonable to me, but my boss often chided me for being reasonable, as if that were the be-all and end-all. So I ask our Office of Economic Development (OED) to find the holes.

The study for the DCW done by the Sage Policy Group concluded that Quantum Loophole (QL) would provide, when fully built, \$40.9 million in tax revenue, of which \$37.7 million would be real property tax. The study said this would be a budget increase of 10.3%, based on FY2022 figures. Let B = the size of the budget. If QL real property tax increases revenue by 10.3%,

New budget could be: $B + 0.103B = 1.103B$. *Great! More money for schools.*

How much is from commercial revenue? Since the increase is all from commercial revenue,

New total amount from commercial revenue: $0.22B + 0.103B = 0.323B$.

What fraction of the new budget will this be?

The new fraction from commercial revenue: $0.323B/1.103B = 0.293$, or 29%.

Look at other figures from the DCW Final Report. It noted that Frederick County has no personal property tax, but other counties do -- Montgomery County, with a tax of \$1.735 per \$100 of assessed value; Washington County, with a tax of \$2.1715 per \$100; and Loudoun County, Virginia, with a tax of \$4.200 per \$100. (*See why Loudoun is the poster child for data center riches?!*) The Report calculated possible further revenues from QL using tax rates of \$1.80 and \$2.00 per \$100 assessed value; results were \$66.9 or \$74.4 million. Calculations like the one above show those increases would further bump the fraction of the budget derived from commercial revenue to 39% or 40%.

Comment: We can appreciate how Virginia has come to suffer from data center addiction!

Now let's come down to earth. QL won't be built in a day; it may be decades. Neither would 10,000 acres be up-and-running at once with new businesses. I note, however, that QL has already started.

Other economic factors must be considered, and political issues will be involved. But I hope I've shown that rezoning 8,000-10,000 acres isn't the only way; there are other options, if we look for them.

Nick Carrera, on scenic Thurston Road

From: [Elizabeth Law](#)
To: [Superczynski, Denis](#); [Gaines, Kimberly](#)
Cc: [Council Members](#); [County Executive](#); [Planning Commission](#); [Fritts, Lara](#); [Murray, Patrick](#); [Venable, Victoria](#); [Bollinger, Jodie](#)
Subject: Why are we rushing the IWW recommendations when the power for datacenters will not be available for years?
Date: Monday, September 30, 2024 10:49:53 AM

[EXTERNAL EMAIL]

County Executive Jessica Fitzwater and all,
Please see the linked article:

<https://www.msn.com/en-us/money/other/ai-data-center-boom-spurs-race-to-find-power/ar-AA1rmq91>
and <https://www.wsj.com/business/energy-oil/ai-data-center-boom-spurs-race-to-find-power-87cf39dd>

In addition to the recent news about QL's reorganization, new articles are written daily about the lack of additional power for high energy industrial users, especially datacenters. Some states have passed legislation to put a moratorium on datacenter approval (see linked article.)

So why is the county rushing IWW recommendations and bypassing the Green Infrastructure Plan? We have time to do this correctly.

Perhaps the Economic Opportunity folks could look into attracting bioengineering or biopharmaceutical companies to the area instead of "putting all our eggs in the datacenter basket" as one member of the IWW committee said. These companies actually provide the job numbers touted by QL and are an asset to the community.

Thanks,
Elizabeth (Betty) Law, Electric Power Engineer

From: [Ann Andrex](#)
To: [County Executive](#)
Cc: [Superczynski, Denis](#); [Gaines, Kimberly](#); [Carpenter, Deborah](#); [Fritts, Lara](#); [Day, Michelle \(FCWS\)](#)
Subject: The Data centers : NO THANKS
Date: Monday, September 30, 2024 3:49:48 PM

[EXTERNAL EMAIL]

Hello All

I do not wish for Frederick County to become a mini- or even mega-Montgomery County. The thought of the kind of development represented by Data Centers, the MPRP and IW2 is chilling and saddening and wholly unacceptable to me. I have lived in both Montgomery County and in Fairfax County in the past. They are HORRIBLE places to live. Is that what you want for Frederick County, too? I doubt it...if you have not lived in those other two places, you have NO IDEA how horrible they are to live in: crowded, rude, mean, ugly, all about moving to your next bigger house and making a financial killing...in other words: **GREED**...They are not my idea of a "Home," at all.

Legislative processes for the IW2 process, the "StopMPRP" high voltage transmission line debates, and now the county's data center legislation consideration all are going on at the same time. WHY?

Here are some thought provoking questions from the Sugarloaf Alliance on the IW2 initiative:

Why was IW2 initiated before the Green Infrastructure Plan?

- o What industries are proposed for any newly rezoned greenfield properties?
- o In the [Advisory Group mapping exercise](#), the first 'strategic question' was "*Regardless of the existing regulations* [our emphasis], where should the County focus its efforts on retaining or growing employment opportunities? Where are the geographic 'sweet spots', and why are they advantageous to our economic development efforts?" We wonder: why isn't this IW2 effort focused on identifying the challenges of redevelopment?
- o Is the county conducting benchmark analyses of other counties' strategies for environmental preservation, smarter growth and economic development?
- o **Are strategies other than extensive development being considered for raising county income, such as business property tax (as in Montgomery**

and Washington Counties) for example?

o Shouldn't economic choices be based on comprehensive, unbiased cost/benefit analysis? Where are those analyses?

Keep Frederick Livable; preserve our farmland and agricultural areas:
all of them

Ann Andrex

From: [betty winholtz](#)
To: [Superczynski, Denis](#); [Gaines, Kimberly](#); [Carpenter, Deborah](#); [Fritts, Lara](#); [Bollinger, Jodie](#); [Day, Michelle \(FCWS\)](#); [County Executive](#)
Subject: public IW2 "outreach" session, sugarloaf
Date: Wednesday, October 2, 2024 12:43:47 AM

[EXTERNAL EMAIL]

Dear Government Officials:

Since the beginning of the Sugarloaf Treasured Landscape Management Plan consideration three years ago, Sugarloaf Alliance has offered well-researched environmental, economic, and community-based reasons why this area ought to be protected - and the protective Sugarloaf Plan boundary maintained - at I-270.

I suggest that this area is only "under-utilized" to those whose incomes derive from development.

Sincerely,
Betty WInholtz

From: [Sue Trainor](#)
To: [Superczynski, Denis](#); [Gaines, Kimberly](#); [Carpenter, Deborah](#); [Fritts, Lara](#); [Bollinger, Jodie](#); [Day, Michelle \(FCWS\)](#); [County Executive](#)
Subject: Comments re Investing in Workers and Workplaces
Date: Tuesday, October 1, 2024 11:06:39 AM

[EXTERNAL EMAIL]

“Investing in Workers and Workplaces” Public Outreach

I’m writing to say that I continue to be profoundly disappointed in the county’s choice of “public outreach” strategies related to the IW2 plan.

The expectation of sending dividing a large group of participants into small groups, sending them to several stations to ask questions, fill out a survey and complete a map exercise has several fatal flaws:

- The public is not livestock to be herded through gates toward whatever you have in mind, nor are we employees or children obligated to take direction. The strong-arming tone at the 9/19 meeting was condescending and highly offensive. I gather that the second meeting was less pressured - an improvement.
- The Himes Avenue building? Is there a less accessible space for public meetings?
- The strategy: When substantial groups of participants are divided into small groups, we don’t get to hear each other’s points of view or the counter arguments to various ideas about envisioning economic growth and development. The small groups aren’t accessible to folks who otherwise might be able to tune in remotely. We all learn from the large group experience; this is a valuable component in the public process. In contrast, small groups in this context are the key element in “divide and conquer” (an interesting, inadvertently honest staff turn-of-phrase at the first public meeting on September 19).
- The IW2 survey, available at the meetings and online, is anonymous. In my nearly four years working with the Sugarloaf Alliance, this is the first public

comment vehicle I've seen where attribution isn't required - name, address, affiliation. In this case, every developer, builder, contractor, their families, their friends - from everywhere - who wants to support an explosion of construction opportunity in Frederick County could respond. Multiple times. Where is the integrity in this choice of input mechanisms? Of critical importance, how does the county plan to manage the responses?

- The content of the IW2 survey includes no context. I'm sure developers and builders have ready answers to the questions, and they speak the same language as those of you in the planning offices. Most of the public are not economists or planners. I know from my Sugarloaf Alliance work that there are many more considerations in smarter growth than just making, selling, servicing, processing, and building things. Without context, will members of the general public consider "economic" factors that aren't about business and money? Lack of context is a fatal bias in this survey. So, again, of critical importance, how does the county plan to manage the responses?

Prior to the 'public outreach,' the first round of input on IW2, the small Advisory Group, was dominated by developers and their cohorts (and the meetings were attended by key players who were not appointed). They had their say over months. Although the meetings were technically public, they were not recorded or accessible for the public to know what those discussions really were. Again, divide and conquer.

This process is not acceptable.

I-270 / Rt. 355 / Sugarloaf Area

This is the summary document I can discuss best, re the Advisory Group's Shared Focus Area Maps.

The Urbana Corridors 270-355-80 summary ignores:

- the approval of the Sugarloaf area plan designated for AG and RC zoning.
- the reality that the I-270 technology corridor, an antiquated 20th century concept, ends at Germantown.
- the fact that demand has evaporated for existing employment/commercial/industrial properties and that some have been rezoned to residential.

- the reality that there is no funding now or in the foreseeable future to create multi-modal transportation.
- even the remnants of the I-270 Tech Corridor, as traditionally defined, between Hyattstown and Urbana lack any infrastructure and require modernized (rather than ORI) zoning to encourage redevelopment and development between 270 and 355.

The Urbana Corridors map represents a slippery slope toward rezoning on the west side of I-270, which would create a "change in the character of the neighborhood" that would be used as justification for other rezonings and development (i.e. data centers) in the Sugarloaf Plan area - among the points Sugarloaf Alliance has been making for three years now. So much for preservation.

We await the pre-empted Green Infrastructure planning.

Thank you for including these comments in the published public record.

Sincerely,
Sue Trainor
2501 Hemingway Dr.
Frederick

From: [Nancy Izant](#)
To: [County Executive](#)
Cc: [Superczynski, Denis](#); [Gaines, Kimberly](#); [Carpenter, Deborah](#); [Council Members](#)
Subject: IW2 Concerns
Date: Wednesday, October 2, 2024 1:54:27 PM

[EXTERNAL EMAIL]

Dear Executive Fitzwater,

I am very concerned and upset about the fast pace and lack of timely public information that is occurring with the IW2 project. Here are just some of my many concerns, so far:

Why the extreme rush for IW2?? Logically, the green infrastructure plan should come first. These decisions are too important to be rushed and much more information, facts and input are needed. The developer-loaded advisory group clearly lacked expertise and input from other segments of the Frederick County population. For example who was involved from the county department of the environment or disaster management?

Quantum Loophole was approved with existing road infrastructure. Yet, it is proposed, by some on the advisory committee, that there needs to be a connection between route 80 and route 15 to accommodate Quantum Loophole traffic. So, here we go...Pandora's box has opened. We are already seeing that the data center 'must be served' and that residents along route 80 may pay the cost of poor county planning.

If you want more tax revenue from business, there are other ways to do it instead of converting green space into commercial industrial acreage. Please, challenge the county planners to first pursue other solutions that would be an inspiration to other cities across the country who are struggling with the same questions. For example: Parking areas at Francis Scott Key Mall could be turned into more commercial and or mixed used space with a short shuttle taking people directly to the train / bus station in back of Target. Road and other infrastructure already exists there! This is just one of many, many possibilities that could totally avoid having to bulldoze precious farmland, trees and natural habitat that are NEEDED to protect us from the extreme weather threats of global warming. We all know that development into green spaces causes runoff. Several hurricanes in recent history have caused extreme flooding of Bennet Creek with debris from the floods more than 20 feet up in the trees when the water finally receded. This is a short distance from my home, and little by little, more homes have been approved in the area. Livable Frederick County states that Global Warming must be infused into every decision the county makes, yet it has not been.

What is the data, in terms of cost/benefit analysis, that what IW2 is addressing are actual problems that need to be solved? The unemployment in Frederick County is actually quite low, is it not? It would appear that this project is just a 'back door' for developers to sneak through to get what they want.

Please, do not take the easy route by caving to the pressure of developers who want to do things the same old-school way by creating more sprawl and all the problems that it brings. All of the above concerns, and more, need to be answered before another step is taken.

Thank you,

Nancy Izant
2770 Lynn St
Frederick, MD 21704

From: [Nick Carrera](#)
To: [Fritts, Lara](#); [Gaines, Kimberly](#); [Superczynski, Denis](#)
Cc: [Carrera, Nicholas](#); [Carrera, Johnny](#)
Subject: Last night's fun, and a comment/question
Date: Thursday, October 3, 2024 9:04:21 AM

[EXTERNAL EMAIL]

I came last night to the IW2 open house expecting to give remarks on the 22%-78% imbalance. But the mood of the room was really about data centers and power lines. I was enjoying that, and didn't feel my remarks would add to the conversation that was going so well.

But I still want to raise a couple of points for you to consider.

Blaine Young signed many DRRAs on his way out, and we may still be feeling the bulge of residential construction that resulted. I suspect that bulge has tilted the balance one way.

The pandemic and the high interest rates I think have suppressed new commercial activity; this would have tilted the balance the same way.

So I'm wondering if the 22-78 balance isn't partly or even largely a temporary thing, and likely to move in the direction you'd like, once things return closer to "normal," with low interest rates, more commercial activity, and less of a housing bulge. It'd be worth teasing out from earlier county budget data where you think the balance needle would end up if we did nothing in the way of overt action. I'm not saying that we do nothing to move the balance, just suggesting that we may not have to do as much as you might have thought.

I was also going to challenge the link between 28% and rezoning 8-to-10 thousand acres. As you have said, there's been no holy writ that says 28% is the canonical number. And I've seen no argument on getting from 28% to 10,000 acres -- that seems to be simply a developer's dream.

Further comment: I have not been alone in my concern that some might try to use the IW2 plan to re-threaten the Sugarloaf Plan, by re-opening Natelli's plans for his extensive holdings to the west of I-270. His supporters in the Group ensured that the mapping exercise included an Urbana Corridor that was vague in extent, and Natelli himself was there keeping an eye on all the meetings (as was David Angell, which so far has puzzled me). My concern was largely tempered yesterday afternoon, when I saw the bills that will be discussed next Tuesday at the CC workshop. One of them includes the Data Center Workgroup's (DCW) Final Report recommendation of where data centers should NOT be located, specifically not in Treasured Landscape areas. The bill doesn't include the parenthetical "Sugarloaf" that was in the DCW Final Report, but I think the meaning is clear even without that.

I look forward to the discussion next Tuesday, and seeing if the full CC -- and CE Fitzwater -- will be fully supportive of that portion of the bill. If so, I may soon be able to find more time for music, reading, and house work.

Cordially,

Nick Carrera
scenic Thurston Road

Date: October 2, 2024

To: Frederick County Executive
Frederick County Council
Frederick County Planning Board
Frederick County Department of Development and Management
State Senate, Karen Lewis Young
Delegate Kris Fair, District 3A
Delegate Ken Kerr, District 3 A
Delegate Karen Simpson, District 3A
Governor Wes Moore, State of Maryland
Angela Alsobrooks, Prince Georges County Executive, seeking the Senate in 2024

From: Susan Gordon
1520 Laurel Wood Way
Frederick, MD 21701
301-401-2446, segmessages@gmail.com

My name is Susan Gordon and I was born in West Virginia. I have lived in Frederick County for 49 years, 42 of those on farms with beef cattle, kid's ponies, one good goat, and the making of hay.

As a West Virginia girl, I am going to begin with some West Virginia history, that I do not think anyone wants replicated in Frederick County or anywhere in the state of Maryland.

Between 1880 and 1920, all of West Virginia was lumbered out. By 1921, there was not a stick standing. None, except at Gaudineer Knob, where the surveyor's stakes didn't meet, and in Aurora, where some folks refused to sell their stand of old growth hemlocks.

With no roots to hold the soil, silt washed into the creeks killing them. Fish died. Animals died. Sparks from the Shay trains pulling out lumber in every holler set all the crowns and slash from those trees alight. Some of those fires burned until the first snow. They burned so fierce, they burned clear down to the rock, forever changing the landscape. Fertile soil was gone. Nothing could be planted. In some places, like Dolly Sods, that has not changed to this day. And with nothing to hold the soil, there was flooding. But the logging companies kept logging. That logging didn't stop until the all trees were gone and the streets of Pittsburgh were flooded with 11 feet of water because all those rivers and creeks those money men had messed with ran north.

There were people in WV who opposed this clear-cut logging. They knew there was a way to log in a sustainable way. They were ignored because there was a rush for lumber and greed prevailed. Folks living on a subsistence farming were told the logging would bring money. Not for long, and never very much in any working person's pocket, 1.50 a day. Towns sprang up. But they also disappeared once the trees were taken.

This is the same story we are living. There is an enormous push for energy and data centers. We are entering a new era. Only now this push isn't just affecting one state. This is a global contagion. When I sat in the Planning Meeting the last two weeks, the note I kept writing to myself was: "What's the Rush?"

We owe it to ourselves and our communities to get this right. No one is going to put AI or the need for energy back in the box and all this rush to create these centers is built on a very faulty structure. Let us think back two years, when this push began.

Sam Altman and Open AI.

Katie Scott, in Tech. Co. wrote last year, "Last August, news hit of a mass exodus from the company's safety team – the so-called Superalignment team. One former employee, Daniel Kokotajlo, said that safety has been sidelined since Altman returned to the top seat. "People who are primarily focused on thinking about AGI safety and preparedness are being increasingly marginalized," he said."

"Ex-employees went public with a scathing letter. They wrote: "We joined OpenAI because we wanted to ensure the safety of the incredibly powerful AI systems the company is developing. But we resigned from OpenAI because we lost trust that it would safely, honestly, and responsibly develop its AI systems."

And now it is everyone: Microsoft, Meta, Google. The guard rails are off. The safety protocols either no longer exist or have holes shot through them. The cat is out of the bag and it is running loose with claws extended trying to grab everything it can, beginning with water and land, right here in Frederick County.

We must get this right. We are moving too fast, way too fast.

The Planning Department and Department of Economic Opportunity are touting this as a chance to extend the commercial tax base and provide new jobs. It is being presented as a turn towards clean energy.

Transmission lines and data centers are neither of those things. If a more sustainable, commercial tax base is needed, the Planning Board, itself, suggested several other ways of achieving those goals.

There are scientists and other citizens who can more accurately address many of these concerns and provide good solutions. Article after article, noting risks and some solutions, has been sent to The Planning Committee, the County Executive, and the County Council. Those articles need to be read. Ignorance is not a defense against greed.

Speaking as a private citizen, and as a life-long Democrat, I understand why the Democrats might be slow to oppose MPRP or data centers. They may see both as ways to move us towards green energy. Democrats are not in denial about climate change. They know we are in peril.

However, PJM and PSEG are not about clean energy. They are about lining their own pockets. PSEG refuses to acknowledge any alternatives to taking homes, farms, and protected environmental areas, **including reconductoring existing lines, co-locating power stations, or Small Modular Reactors.** Data centers and PSEG are seeking the most arable land in Frederick County. They are also seeking land in Agricultural Preservation or in Conservation Easement because the development rights on that land have been relinquished. The land is cheap. If we let them, they will take precisely the land that keeps us green, shaded, cool, wet, and species diverse, the land that grows our 935 million dollars of produce Maryland sells abroad, and use it for data centers and transmission lines.

I spoke to a gentleman on a piece of land that will be crossed by the transmission lines. He works in the military and said that we are light-years behind the Chinese in cyber-security and we need to build every data center we can build. However, he added, when he served in Iraq, “we buried all their power lines underground, with American dollars, because it kept their grid secure.”

We can do it for Iraq and not for ourselves?

And then there is Quantum Loophole, who has been doing horizontal fracking and leaking bentonite into the water; it has turned the water orange water and kills every living thing in it.

Does this sound like green energy, clean energy, to you?

Let’s slow down. The County Council and the County Executive have made that unanimous, bi-partisan decision. I thank them.

I will close with this. If the Planning Department and the Department of Economic Opportunity go along with this plan because they think there is something in it for Frederick County, I believe they are being deceived. There is a shark out there, a profit-driven shark, that cares nothing for our welfare and we are the latest shrimp they are about to eat. They are beholden to their shareholders, not to us; they are committed to doing this quick and on the cheap. They are committed to doing it without regulations, because regulations cut into their bottom-line.

And you can say to me, “It’s already out there, it is an unstoppable force,” and I will share this story every 12 Step person, every counselor knows.

There was once a great storm, an unstoppable storm, a tsunami, and thousands upon thousands, millions upon millions of starfish were cast up upon the shore, all twisting and dying beyond the safety of the sea. One person, perhaps the monk from the Buddhist temple** on Manor Woods Rd, walked along the shore, picking up one starfish after another and casting it back into the water. Another person walked along the beach and called that monk stupid, deluded, and a fool, “You can’t save these starfish. What you are doing will not make one whit of difference.” The monk, casting, one starfish after another into the water said, “It does to the one that is back in the ocean.”

So, who do we want to be in Frederick County, in the middle of this undeniable tsunami: thoughtful, measured people, tossing the starfish we can reach into the sea, although we cannot reach most. Do we want to seek the best solutions for all our citizens? Or do we want to be pawns in a greed game that is rigged against us.

As one of the farmers, who I interviewed, put it, “The bank robbers aren’t going to put the money back in the bank.” It is us, the citizens, who ask questions, urge consideration, and our elected officials, who can set better rules for the road in this perilous race.

And there is a WV postscript. Old growth forests were taken. That gold-rush, greed-driven logging destroyed them forever. And in the mid-1950’s, 30 years after the logging ended, you could still see great gouges, fans of deep gouges that ran from the top of mountain after mountain, and clear to their base. Scars created by steam-driven skid-loaders, the data centers of their day. What permanent scars will these proposed transmission lines and data centers create? The transmission lines are already obsolete. The data centers will be. What will they destroy that can never be replaced?

**The Buddhist Temple on Manor Woods Road, Adamstown, MD will be crossed by power lines that will destroy it. Because Buddhists are pacifists, they cannot join this fight. They are relying on our voices to speak for them.

From: [Bill Steigelmann](#)
To: [County Executive](#); [Council Members](#); [Planning Commission](#)
Subject: Recommendation for the Next Step in Rezoning for the "Workers and Workplaces" initiative
Date: Monday, October 7, 2024 4:01:54 PM

[EXTERNAL EMAIL]

I am a retired engineer and a 30-year Ruritan Member who currently lives on a 100-acre farm near Middletown. Although I grew up in Philadelphia, I am completely in alliance with my neighbors and friends who are aggressively fighting the County's unreasonable plan to unilaterally rezone 10,000 acres of agricultural land for large-scale commercial & industrial (C&I) uses -- a.k.a. data centers, who pay many times more in taxes per acre, but which have serious environmental and public safety threats, which the County has ignored. Data centers also absolutely ruin Frederick County's plan to reduce GHG emissions, which CE Fitzwater once supported but now appears to be ignoring. GHG emissions per MWh of electricity consumed in the multi-state PJM region have been falling in recent years, but now are rising -- which will continue as long as the number of data centers in the region increases. Data centers consume many times more MW/sq.ft of floorspace than almost any other C&I enterprise.

Here are my three recommendations for how to proceed with the Workers and Workplaces initiative:

1. Reduce the scope to 5,000 acres -- it can be increased a few years later if this is necessary.
2. Send a letter to each landowner whose property is targeted for possible rezoning. The letter would explain the reasons, how properties were selected, and ask whether they would not strongly object to the rezoning, either now or a few years hence. Many landowners will always be opposed to the rezoning, but some may be thinking about retiring, and the prospect of selling their property for many times its current value may be attractive. If 50 owners of 100 acre farms indicate they are willing to consider a future rezoning, the County will be spared a lot of bad feelings and expensive legal battles.

William Steigelmann

From: [Kim Westervelt](#)
To: [Planning Commission](#); [sugarloafalliance](#); [Kim Westervelt](#)
Subject: Sugarloaf Plan Overlay District
Date: Saturday, October 5, 2024 4:21:29 PM

[EXTERNAL EMAIL]

Dear Elected Officials:

It is sad that we are once again going through the processes to dismantle the Livable Frederick Master Plan (LFMP) and the areas it encompasses. More houses and businesses are not the only signs of progress – we certainly know by now that green spaces and the connection to nature, clean air and water, and peace and quiet are necessary for humans to live better and healthier lives. All the wonderful things that draw people to Frederick.

Development will always be moving ahead, but it must be controlled by fully reviewing other sustainable options and protecting undeveloped land before proceeding with any new development. Redevelopment of existing commercial/industrial properties to update usage should be reviewed and put in place. Priority should be given to recognizing and promoting agricultural enterprises among target industries. Any potential new business prospects must be reviewed for their full range of impacts on the community, from environmental impacts on forest, farmland, and water resources, to power lines, air/water/noise/light pollution, costs to county and county residents for long term infrastructure (water, sewer, roads, electricity, etc.).

It appears the newly formed IW2 advisory group primarily represents the views of developers with profit and return-on-investment objectives who have determined that agricultural and resource conservation lands are “underperforming,” ignoring their value in food production, water and air quality, carbon storage and sustainability, recreation, health and habitat. What about the state laws regarding forest preservation, agriculture industry protection, water supplies and waterway protection, or air quality?

Do we have independent research studies that address the consequences of IW2 development and the potential for other redevelopment options? What about the quality-of-life consequences of IW2 development - higher electricity bills, incompatible land uses, reduced water supplies and water and air quality, school overcrowding, traffic congestion, and reduced green space – all in contradiction to the values described in the LFMP?

An, what is this about potential tax changes? The commercial portion of the county tax base should be increased to 28% (from the current 21%) and that those jurisdictions more successful at promoting business development get 32% or more of their tax revenues from that sector? Development is not more important than preserving farms, forests, water supplies, air quality, and protection against climate change.

I am sure you are aware of the LFMP document which begins with a statement of the county's values: *“Livability is the sum of the factors that add up to our quality of life in Frederick County. It is the ability to easily get where you’re going, to enjoy great parks, to benefit from great schools, to find support when you need it, to form bonds with your neighbors, to have access to*

excellent stores, restaurants, and entertainment, to have good jobs close to home, to enjoy the revitalizing qualities of our forests, rivers, mountains, and countryside, and to be in harmony with the systems that surround, support, and underlie our ability to live happy, healthy, long, and prosperous lives.

“To preserve, sustain, and create livability, we must define and advance our shared values as they impact our built and natural environments, our community health, our economic prosperity, our social stability and equity, our education, and our cultural, entertainment and recreational opportunities. This is the central ambition of Livable Frederick. It is a bold and visionary purpose, but one that is at the heart of every technical and practical effort to plan our communities.”

This statement explains what residents have tried to obtain and retain through conservation and development of the LFMP. Please address these and other economic development issues in the IW2 Plan before it reaches the Planning Commission and County Council. If you do not, then the Plan will be developer-driven with those developers nominating parcels now zoned AG or RC that they own, control or are affiliated with. We need to keep the advisory process on county land use out of the hands of special interest groups like land and data center developers. We need to make economic choices rooted in the county's identity and based on comprehensive, unbiased cost/benefit analysis.

Please push back against additional development in this area and refer to the LFMP, which requires land use plans and actions to be viewed through the lens of climate change. The first priority is to preserve green infrastructure and ensure we have smart, sustainable community planning in place.

Once this land is taken and destroyed, there is no going back and it is the citizens of Frederick and surrounding counties, and Maryland who will pay the price.

Thank you for your time and consideration.

Kendra Westervelt