



Bruce N. Dean, Esq.
D/L 240-503-1455
bdean@mdglawfirm.com

June 27, 2025

VIA ELECTRONIC AND REGULAR MAIL

Kimberly Gaines
Livable Frederick Director
Frederick County Government
Division of Planning and Permitting
30 North Market Street
Frederick, MD 21701

Re: CDI Overlay Zone Mapping/Manor Woods Road Properties LLC/Noffsinger Parcels

Dear Kim:

I am writing on behalf of my client, Manor Woods Road Properties LLC, owner or contract purchaser of seven (7) parcels of land located in the Adamstown Planning Region of Frederick County, Maryland, south of Manor Woods Road and east of Cap Stine Road. These parcels are referred to collectively at times in this letter as the "Noffsinger Parcels," but which are also referred to individually as "Parcel 54," which contains approximately 64 acres of land more particularly shown and described on a plat recorded among the Plat Records of Frederick County, Maryland in Plat Book 106, page 134; "Parcel 1" consisting of the approximately 31.21799 acres that adjoins Parcel 54 to the south; and, the "Agricultural Lots," which refers to those five (5) lots shown and described on the plat recorded among the aforesaid plat records in Plat Book 84, page 95.

The Noffsinger Parcels are shown on the Exhibit enclosed with this letter. Parcel 54 and Parcel 1 are both designated General Industrial in the Frederick County Comprehensive Plan and are zoned General Industrial. Parcel 54 has an approved Adequate Public Facilities ("APFO") Letter of Understanding dated May 11, 2023 (the "LOU"), permitting development of Parcel 54

Kim Gaines
Livable Frederick Director
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for the generation of up to 176 am and 170 pm weekday peak hour driveway trips, which would permit the development of Parcel 54 with up to approximately 1,600,000 square feet of Critical Digital Infrastructure facilities.

The purpose of this letter is to request that Frederick County: 1) designate the Agricultural Lots for General Industrial land use in the County's Comprehensive Plan and include them (as well as a small portion of Parcel 54) as Planned Service in the Water and Sewerage Plan; 2) include all of the Noffsinger Parcels (to the extent not already depicted as such) in the Community Growth boundary; 3) place all of the Noffsinger Parcels within the proposed Critical Digital Infrastructure Overlay Zone; and 4) comprehensively rezone the Agricultural Lots from the current Agricultural (A) zoning classification to the General Industrial (GI) zoning classification. The entire Noffsinger Family fully supports this request.

Based on our review of draft Bill 25-06, we believe that the Noffsinger Parcels meet all of the legal and land use planning requirements for these 3 requests. The Noffsinger Parcels are not proximate to any schools, colleges or universities, daycare centers or healthcare facilities. There are no properties adjacent to the Noffsinger Parcels that are zoned or comprehensively planned for residential development. The only nearby residences are located on the Agricultural Lots and Parcel 1, and are owned by Manor Woods Road Properties LLC. The Noffsinger Parcels are further bounded by the Mullinix Agro Industrial Park to the east and by the Stanford Industrial Park to the west which are already zoned LI or GI. In addition, the property abutting the agricultural parcels to the south is already designated for industrial zoning in the Frederick County Comprehensive Plan. The former Eastalco site, being developed as a Critical Digital Infrastructure (CDI) campus housing approximately 17,000,000 square feet of CDI facilities and other employment uses, is located to the east along Manor Woods Road just past the Mullinix Agro Industrial Park. Being in close proximity to the Eastalco site means that the Noffsinger Parcels have nearby access to necessary infrastructure such as fiber, electricity, and public water and sewer facilities. This adjacency to Eastalco, along with the existence of the LOU and the current General Industrial zoning for Parcel 54 and Parcel 1, make the Noffsinger Parcels uniquely suitable and viable to house additional CDI facilities. Finally, containing in the aggregate approximately 100 acres means that the combined acreage of the Noffsinger Parcels is less than two-hundredths of one percent of Frederick County's land mass and will meet the County's goal of designating less than 1% of the County's land mass for CDI uses.



Kim Gaines
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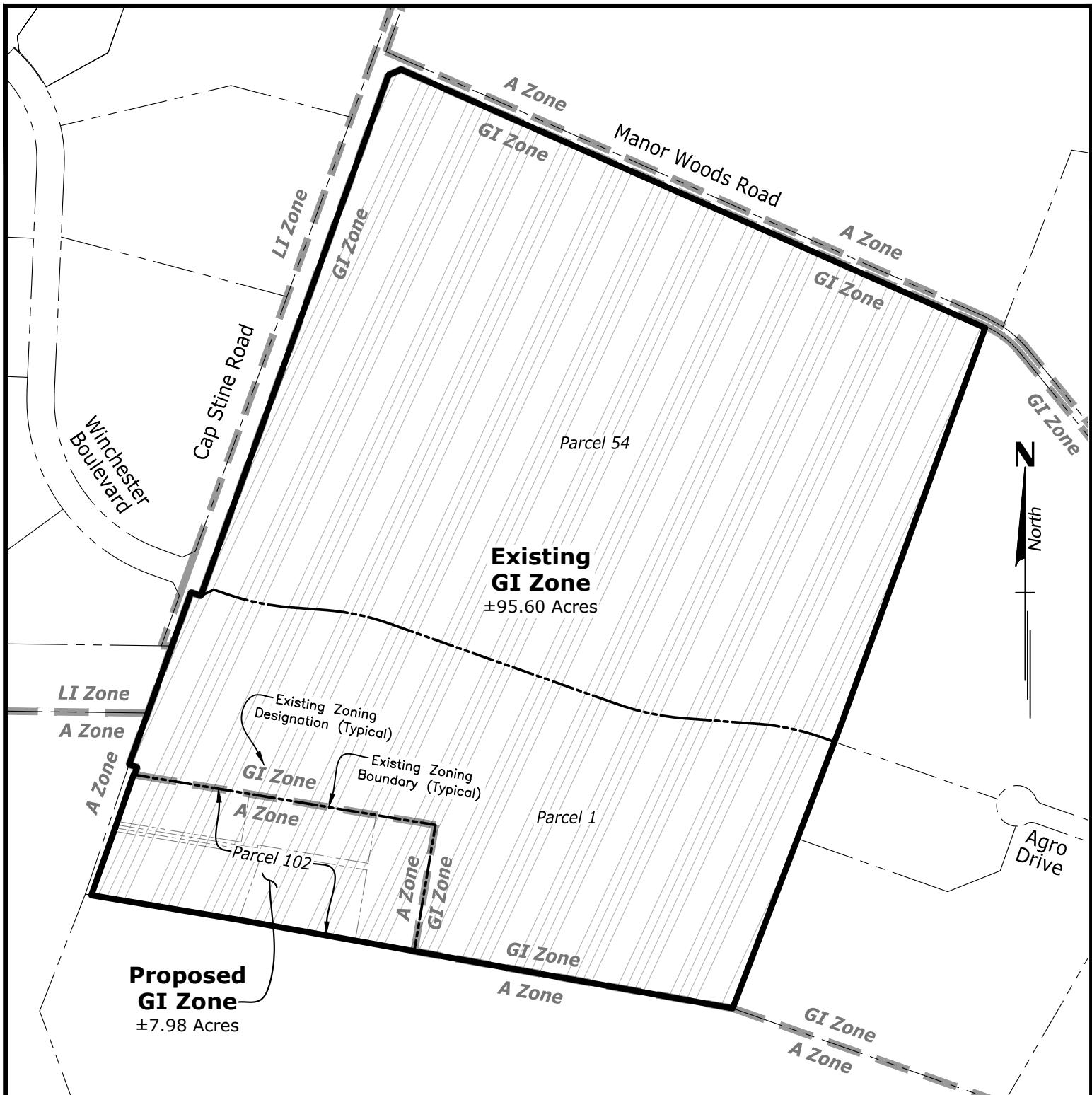
I hope this information is helpful to you, your staff and the Planning Commission in the creation of the CDI Overlay Zone, Comprehensive Plan and Zoning Map. Should you or any of your staff have any questions regarding the Noffsinger Parcels, please feel free to contact me.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Bruce N. Dean'.

Bruce N. Dean

cc: Denis Superczynski
Karin Flom
Tom Natelli
Dusty Rood



Existing Zoning

±103.58 Ac.: Total Area Shown
±95.60 Ac.: GI Zone
±7.98 Ac.: A Zone

Proposed Zoning

±103.58 Ac.: Total Area Shown
±103.58 Ac.: GI Zone

**Exhibit of
Parcels 1, 54 & 102
Tax Map 94**

**Buckeystown (1st) Election District
Frederick County, Maryland**
Scale: 1" = 400'



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VIA ELECTRONIC AND REGULAR MAIL

Kimberly Gaines
Livable Frederick Director
Frederick County Government
Division of Planning and Permitting
30 North Market Street
Frederick, MD 21701

Re: CDI Overlay Zone Mapping/NDR Properties LC

Dear Kim:

I am writing on behalf of my client, NDR Properties LC, owner of two (2) properties located west of and along New Design Road, the first containing 201.82 acres of land located at 4020 New Design Road, and the second containing 196.73 acres located at 4206 New Design Road (collectively, the "Properties"). The Properties are shown on the aerial photograph exhibit enclosed with this letter. The purpose of this letter is to request that Frederick County: 1) designate the Properties for Limited Industrial land use in the County's Comprehensive Plan, including removing any Priority Preservation Area or Rural Legacy designations from them, including them within the Community Growth Boundary and including them as Planned Service in the Water and Sewerage Plan; 2) place the Properties within the proposed Critical Digital Infrastructure Overlay Zone; and 3) comprehensively rezone the Properties from their current Agricultural (A) zoning classification to the Limited Industrial (LI) zoning classification.

Based on our review of draft Bill 25-06, we believe that the Properties meet all of the legal and land use planning requirements for these 3 requests. The Properties are not proximate

Kim Gaines
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to any schools, colleges or universities, daycare centers or healthcare facilities. The only nearby residences are three (3) dwellings along New Design Road and three (3) dwellings at the end of Char Leigh Circle. The Properties are further bounded by the Argos Quarry to the east and by the former Eastalco site being developed as a Critical Digital Infrastructure (CDI) campus housing approximately 17,000,000 square feet of CDI facilities and other employment uses to the south and southwest. Furthermore, being adjacent to the Eastalco site means that the Properties have immediate access to necessary infrastructure such as fiber, electricity, and public water and sewer facilities. This adjacency to Eastalco makes the Properties uniquely suitable and viable to house additional CDI facilities. Finally, containing in the aggregate approximately 400 acres means that combined acreage of the Properties is less than one-tenth of one percent of Frederick County's land mass and will meet the County's goal of designating less than 1% of the County's land mass for CDI uses.

I hope this information is helpful to you, your staff and the Planning Commission in the creation of the CDI Overlay Zone, Comprehensive Plan and Zoning Map. Should you or any of your staff have any questions regarding the Properties, please feel free to contact me.

Very truly yours,



Bruce N. Dean

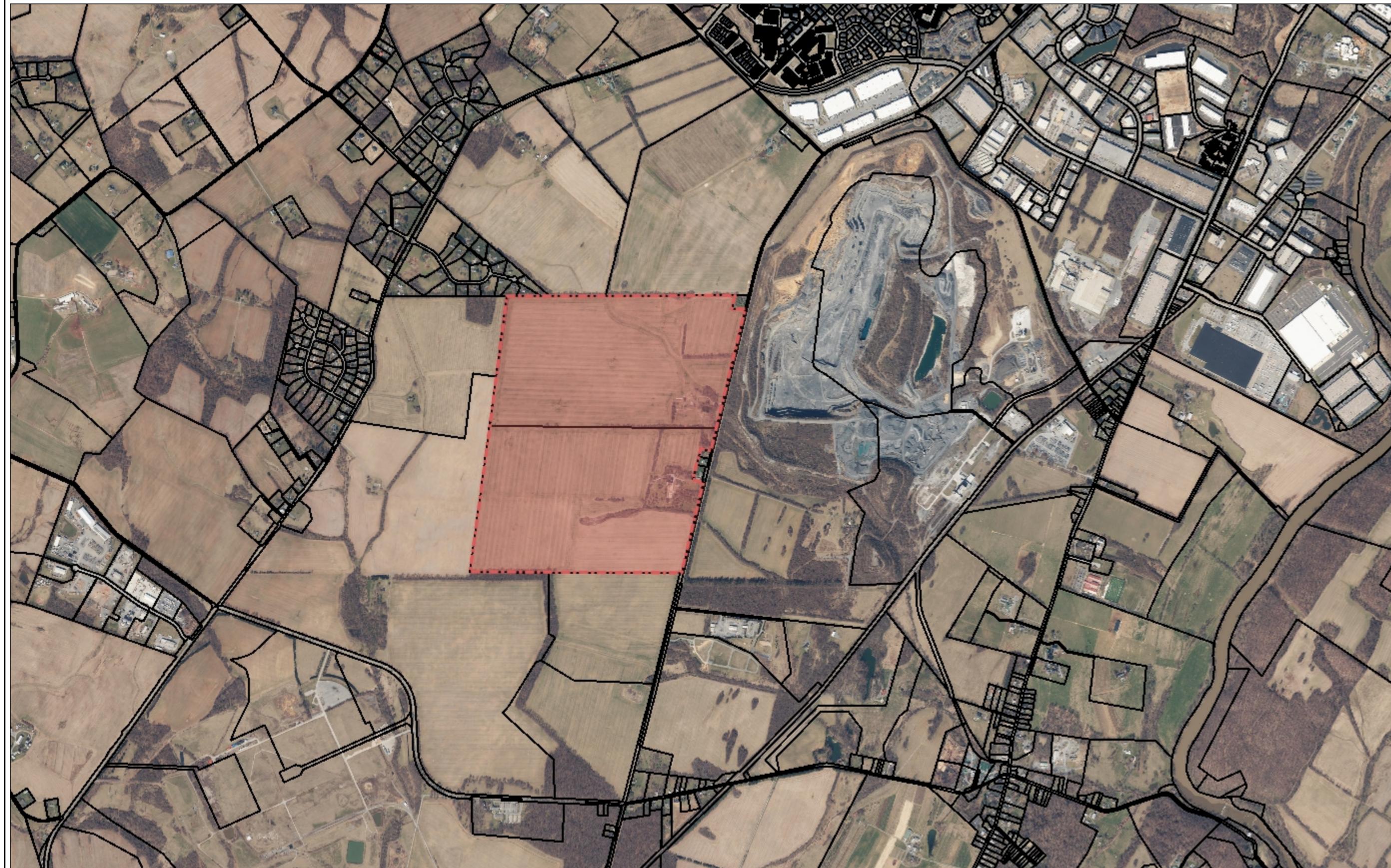
cc: Denis Superczynski
Karin Flom
Don Pleasants



Frederick County,
Maryland

NDR Properties, LC

- Parcel
- Frederick County Boundary
- Surrounding Counties
- Maryland
- <all other values>



3,200.0

0

1,600.00

3,200.0 Feet

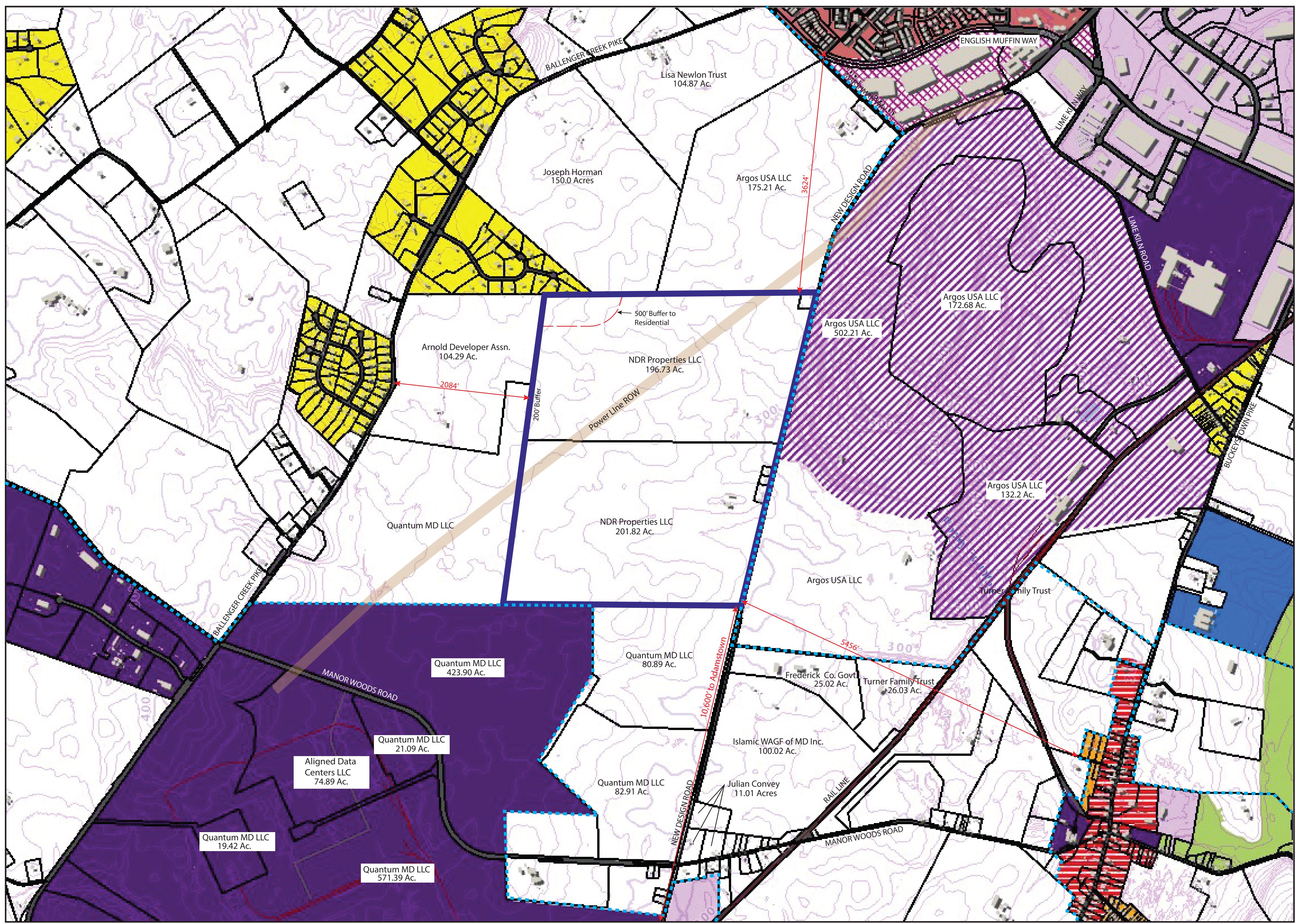
1: 19,200

6/16/2025

NAD_1983_StatePlane_Maryland_FIPS_1900_Feet



While efforts have been made to ensure the accuracy of this map, Frederick County accepts no liability or responsibility for errors, omissions, or positional inaccuracies in the content of this map. Reliance on this map is at the risk of the user. This map is for illustration purposes only and should not be used for surveying, engineering, or site-specific analysis.



NEW DESIGN ROAD PROPERTY EXHIBIT

Scale: 1" = 800'



July 3, 2025

VIA ELECTRONIC AND REGULAR MAIL

Kimberly Gaines
Livable Frederick Director
Frederick County Government
Division of Planning and Permitting
30 North Market Street
Frederick, MD 21701

Re: CDI Overlay Zone Mapping/Geisinger Property

Dear Kim:

I am writing on behalf of my client, Quantum Maryland LLC, c/o Catellus Maryland, LLC (“Catellus”), which is working with the Geisinger family regarding 210.992 acres of land located at 4960 Mountville Road, commonly known as the “Geisinger Property”, as more particularly shown on the enclosed exhibit. The Geisinger Property is located immediately west of and adjacent to the site of the former Eastalco aluminum smelting plant which is currently being developed by Catellus as the only comprehensively planned data center campus in Frederick County (the “Eastalco Data Center Campus”). The Eastalco Data Center Campus has an approved Adequate Public Facilities Ordinance (“APFO”) Amended and Restated Letter of Understanding dated February 15, 2023, for the development of up to 17,403,344 square feet of data center, 821,881 square feet of office, and 7,500 square feet of commercial use, as amended by a Second Amended and Restated Adequate Public Facilities Letter of Understanding dated August 21, 2024 (collectively, the “LOU”). Numerous site plans have been approved within the Eastalco Data Center Campus for Critical Data Infrastructure facilities and for Critical Data Infrastructure Electric Substation facilities by the Frederick County Planning Commission, and construction of these facilities has commenced. An exhibit showing the Geisinger Property is enclosed with this letter.

The purpose of this letter is to request that Frederick County: 1) designate the Geisinger Property for Limited Industrial land use in the County’s Comprehensive Plan, including placing the Geisinger Property in the Community Growth boundary, removing any Priority Preservation Area or Rural Legacy designations from the Geisinger Property and including it as Planned Service in the Water and Sewerage Plan; 2) place the Geisinger Property within the proposed Critical Digital Infrastructure Overlay Zone (“CDIOZ”); and 3) comprehensively rezone the

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Geisinger Property from its current Agricultural (A) zoning classification to the Light Industrial (LI) zoning classification.

In reviewing property owner requests to be included in the CDIOZ, Frederick County should be ranking such requests based upon two (2) base factors: 1) does the site for which the CDIOZ is requested meet the intent and the legal requirements of draft Bill 25-06, and 2) does the site have access to electric power, public water, public sewer and telecommunications infrastructure. While other properties in the Eastalco area which are under consideration for the application of the CDIOZ may meet the intent and the legal criteria for the CDIOZ, and while some have existing industrial zoning and/or an industrial Comprehensive Plan designation, only the Eastalco Data Center Campus can affirmatively answer “yes” to the second base factor, and only Catellus can make the promise that this infrastructure will be available to any other offsite property, such as the Geisinger Property, for which Catellus is the contract purchaser.

Quantum Maryland LLC has invested hundreds of millions of dollars in insuring that electric power, public water and sewer, and telecommunications infrastructure optics are all available to the Eastalco Data Center Campus. Any other property owner is going to have to either make a similar investment from scratch (highly unlikely), or have to come to an agreement with Catellus to have access to the infrastructure which Catellus has brought to the region. For that reason alone, the request for the Geisinger Property to be within the CDIOZ and to have industrial zoning should be among the starting points for Frederick County in this mapping effort, prior to considering additional lands outside of Catellus’s control.

Having immediate access to electric power, public water, public sewer and telecommunications infrastructure, with an approved APFO LOU for well over 17,000,000 square feet of CDI facilities also means that the Eastalco Data Center Campus will, even without inclusion of the Geisinger Property, be among the largest employment centers in Frederick County, if not the largest. This size and access to infrastructure means that Catellus can enter into a Community Benefit Agreement with Frederick County that would significantly outpace any other property owner’s ability to provide public benefits to the County, whether in terms of providing land or money to secure agricultural preservation easements on other properties, or in terms of providing other public benefits such as school construction funding, assistance to STEM education opportunities, or such other benefits as might be negotiated. If Frederick County wants to take advantage of the economic opportunities from data centers now, rather than years in the future, it needs to start with rezoning the Geisinger Property to the CDIOZ and allowing Catellus to add the Geisinger Property to its Eastalco Data Center Campus.

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For all of these reasons, we believe that including the Geisinger Property within the CDIOZ and changing the Geisinger Property's land use and zoning classifications to either General Industrial or Light Industrial should be among the first priorities in determining how much land should be included in the CDIOZ.

Furthermore, based on our review of draft Bill 25-06, we believe that the Geisinger Property meets all of the legal and land use planning requirements for these requests. The Geisinger Property is not proximate to any schools, colleges or universities, daycare centers or healthcare facilities. There are no properties adjacent to the site that are zoned or comprehensively planned for residential development, and there are only a handful of agriculturally zoned dwellings which abut the Geisinger Property. As stated above, the Eastalco Data Center Campus has invested millions of dollars in providing access to electric power, public water and sewer service and telecommunications infrastructure, such that including the Geisinger Property as part of the Eastalco Data Center Campus would have immediate access to this infrastructure. Finally, even when including the 210 acre Geisinger Property, the entire Eastalco Data Center Campus includes only slightly over one-half of one percent of Frederick County's land mass and easily meets the County's goal of designating less than 1% of the County's land mass for CDI uses, while leaving significant additional acreage which can be designated CDIOZ, now or in the future, while still remaining under the stated cap..

I hope this information is helpful to you, your staff and the Planning Commission in the creation of the CDI Overlay Zone, and in updating the Comprehensive Plan and Zoning Map. Should you or any of your staff have any questions regarding the Properties, please feel free to contact me.

Very truly yours,



Bruce N. Dean

cc: Denis Superczynski
Karin Flom
Michael Kuykendall

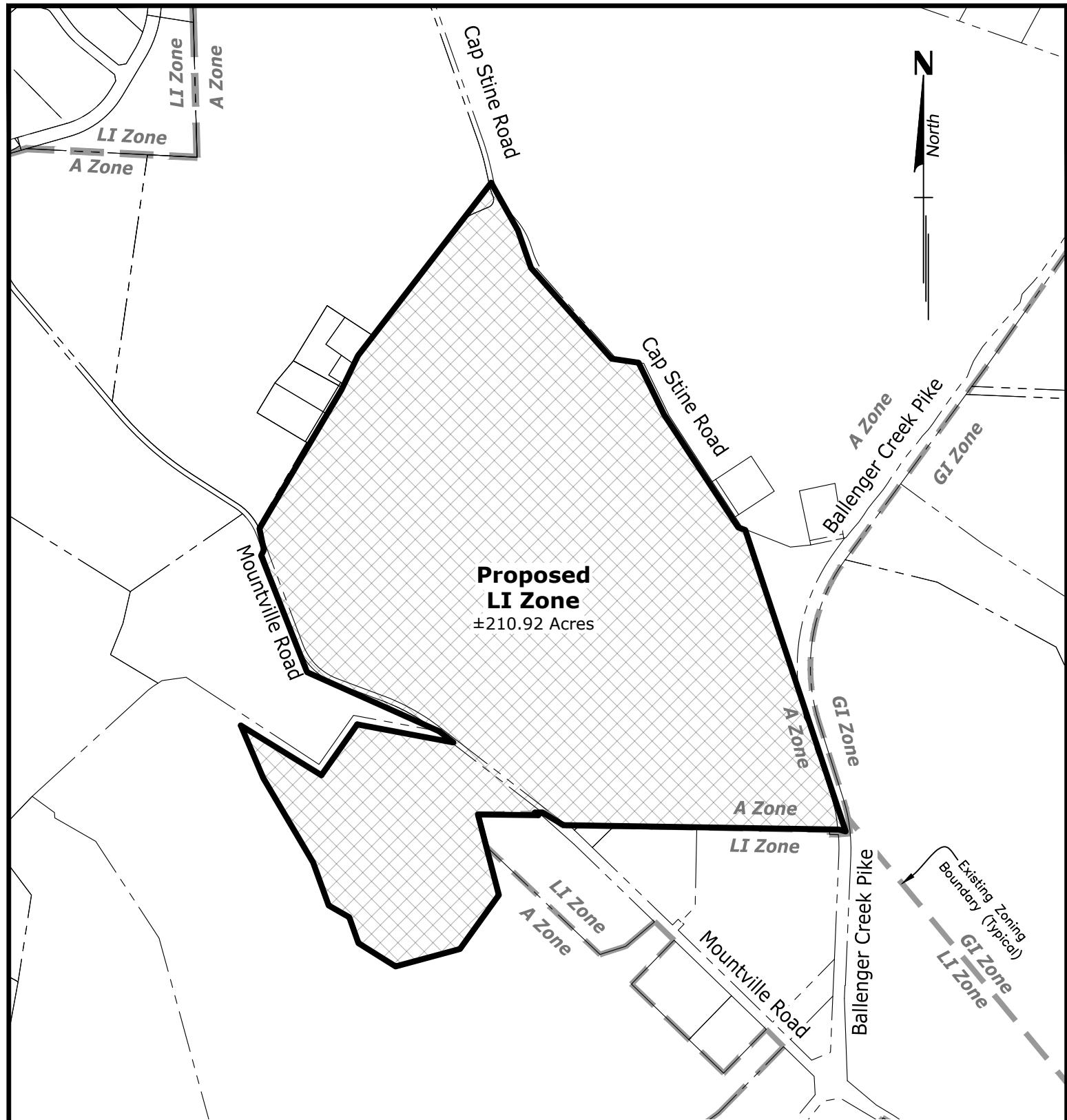


Exhibit of
Parcel 17, Tax Map 94
Parcel I.D. No. 01-006525
Property of
The Geisinger Family Trust
& The Geisinger Credit Trust
Liber 17050, folio 117
Buckeystown (1st) Election District
Frederick County, Maryland
Scale: 1" = 800'

Existing Zoning

±210.92 Ac.: Total Parcel Area
 ±210.92 Ac.: A Zone

Proposed Zoning

±210.92 Ac.: Total Parcel Area
 ±210.92 Ac.: LI Zone



July 3, 2025

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Kimberly Gaines
Livable Frederick Director
Frederick County Government
Division of Planning and Permitting
30 North Market Street
Frederick, MD 21701

Re: CDI Overlay Zone Mapping/Eastalco Data Center Campus Site

Dear Kim:

I am writing on behalf of my client, Quantum Maryland LLC, c/o Catellus Maryland, LLC (“Catellus”), owner of approximately 2,122 acres of land, more or less, located north of Adamstown, which is the site of the former Eastalco aluminum smelting plant and which is currently being developed as the only comprehensively planned data center campus in Frederick County (the “Eastalco Data Center Campus”). The Eastalco Data Center Campus has an approved Adequate Public Facilities Ordinance (“APFO”) Amended and Restated Letter of Understanding dated February 15, 2023, for the development of up to 17,403,344 square feet of data center, 821,881 square feet of office, and 7,500 square feet of commercial use, as amended by a Second Amended and Restated Adequate Public Facilities Letter of Understanding dated August 21, 2024 (collectively, the “LOU”). Numerous site plans have been approved within the Eastalco Data Center Campus for Critical Data Infrastructure facilities and for Critical Data Infrastructure Electric Substation facilities by the Frederick County Planning Commission, and construction of these facilities has commenced.

As shown on **Exhibit A**, enclosed, of the 2,122 acres making up the Eastalco Data Center Campus, approximately 1,502 acres are zoned either General Industrial (GI) or Light Industrial (LI) and have a Comprehensive Plan designation of either General Industrial, Limited Industrial or Natural Resource (along the stream valleys), and are subject to the LOU (hereinafter these 1,502 acres will be referred to as the “Industrial Properties”). The remaining 620 acres, more or less, are zoned Agriculture (A) and have a Comprehensive Plan designation of Agricultural or Natural Resource and are not subject to the LOU. Of these 620 acres, Catellus is proposing for approximately 58 acres of land, as shown on **Exhibit A**, to remain in Agriculture zoning and with a Comprehensive Plan designation as Agricultural, so as to provide additional buffer areas to

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certain surrounding properties. The remaining 562 acres, more or less, as shown on **Exhibit A**, are hereinafter referred to as the “Ag Properties” which are subject to the zoning requests set forth below.¹

The purpose of this letter is to request that Frederick County: 1) designate the Ag Properties for Limited or General Industrial land use in the County’s Comprehensive Plan, including placing them within the Community Growth boundary, removing any Priority Preservation Area or Rural Legacy designations from the Ag Properties and including them as Planned Service in the Water and Sewerage Plan; 2) place the entire Eastalco Data Center Campus, including both the Industrial Properties and the Ag Properties, within the proposed Critical Digital Infrastructure Overlay Zone (“CDIOZ”); and 3) comprehensively rezone the Ag Properties from their current Agricultural (A) zoning classification to the either the General Industrial (GI) or Light Industrial (LI) zoning classification.

In reviewing property owner requests to be included in the CDIOZ, Frederick County should be ranking such requests based upon two (2) base factors: 1) does the site for which the CDIOZ is requested meet the intent and the legal requirements of draft Bill 25-06, and 2) does the site have access to electric power, public water, public sewer and telecommunications infrastructure. While other properties in the Eastalco area which are under consideration for the application of the CDIOZ may meet the intent and the legal criteria for the CDIOZ, and while some have existing industrial zoning and/or an industrial Comprehensive Plan designation, only the Eastalco Data Center Campus and Catellus can affirmatively answer “yes” to the second base factor.

Quantum Maryland, LLC has invested hundreds of millions of dollars in insuring that electric power, public water and sewer, and telecommunication infrastructure are all available to the Eastalco Data Center Campus. Any other property owner is going to have to either make a similar investment from scratch (highly unlikely), or have to come to an agreement with Catellus to have access to the infrastructure which Catellus has brought to the region. For that reason alone, rezoning 2,064 acres of the 2,122 acre Eastalco Data Center Campus to be within the

¹ It should also be noted that approximately 294 acres of the Industrial Properties as shown on **Exhibit A**, are within the Waterbody Buffer and cannot be developed. However, this is just the regulatory buffer area. Additional area has been and will be set aside and protected for forestation easements as well as compatibility zones within the Industrial Properties. Furthermore, the FAR of the developed land bays themselves are fairly low, with generous greenspace being provided within the developed land bays.

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CDIOZ and to have industrial zoning on these 2,064 acres should be the starting point for Frederick County in this mapping effort, prior to even considering additional lands.

Having immediate access to electric power, public water, public sewer and telecommunication infrastructure, with an approved APFO LOU for well over 17,000,000 square feet of CDI facilities, also means that the Eastalco Data Center Campus will, even without inclusion of the Ag Properties, be among the largest employment centers in Frederick County, if not the largest. This size and access to infrastructure means that Catellus can enter into a Community Benefit Agreement with Frederick County that would significantly outpace any other property owner's ability to provide public benefits to the County, whether in terms of providing land or money to secure agricultural preservation easements on other properties, or in terms of providing other public benefits such as school construction funding, assistance to STEM education opportunities, or such other benefits as might be negotiated. If Frederick County wants to take advantage of the economic opportunities from data centers now, rather than years in the future, it needs to start with rezoning the entire Eastalco Date Center Campus to the CDIOZ and allowing these 2,064 acres (less the 294 acres of waterbody buffer) to be utilized for CDI development.

For all of these reasons, we believe that including the proposed 2,064 acres of the Eastalco Data Center Campus within the CDIOZ and changing the Ag Properties' land use and zoning classifications to either General or Light Industrial should be the first priority in determining how much land should be included in the CDIOZ.

Finally, based on our review of draft Bill 25-06, we believe that including these 2,064 acres of Eastalco Data Center Campus within the CDIOZ meets all of the legal and land use planning requirements for these requests. The Eastalco Data Center Campus is not proximate to any schools, colleges or universities, daycare centers or healthcare facilities. There are no properties adjacent to the site that are zoned or comprehensively planned for residential development, and there are only a handful of agriculturally zoned dwellings which abut the site. As stated above, the Eastalco Data Center Campus has invested millions of dollars in providing access to electric power, public water and sewer service and telecommunication infrastructure, such that including the Ag Properties as part of the Eastalco Data Center Campus would have immediate access to this infrastructure. Finally, even when including the 562 acres making up the Ag Properties, the entire 2,064 acres of the Eastalco Data Center Campus includes only about one-half of one percent of Frederick County's land mass and easily meets the County's goal of designating less than 1% of the County's land mass for CDI uses, while leaving significant

Kim Gaines
July 3, 2025
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acreage which can be designated CDIOZ, now or in the future, while still remaining under the stated cap.

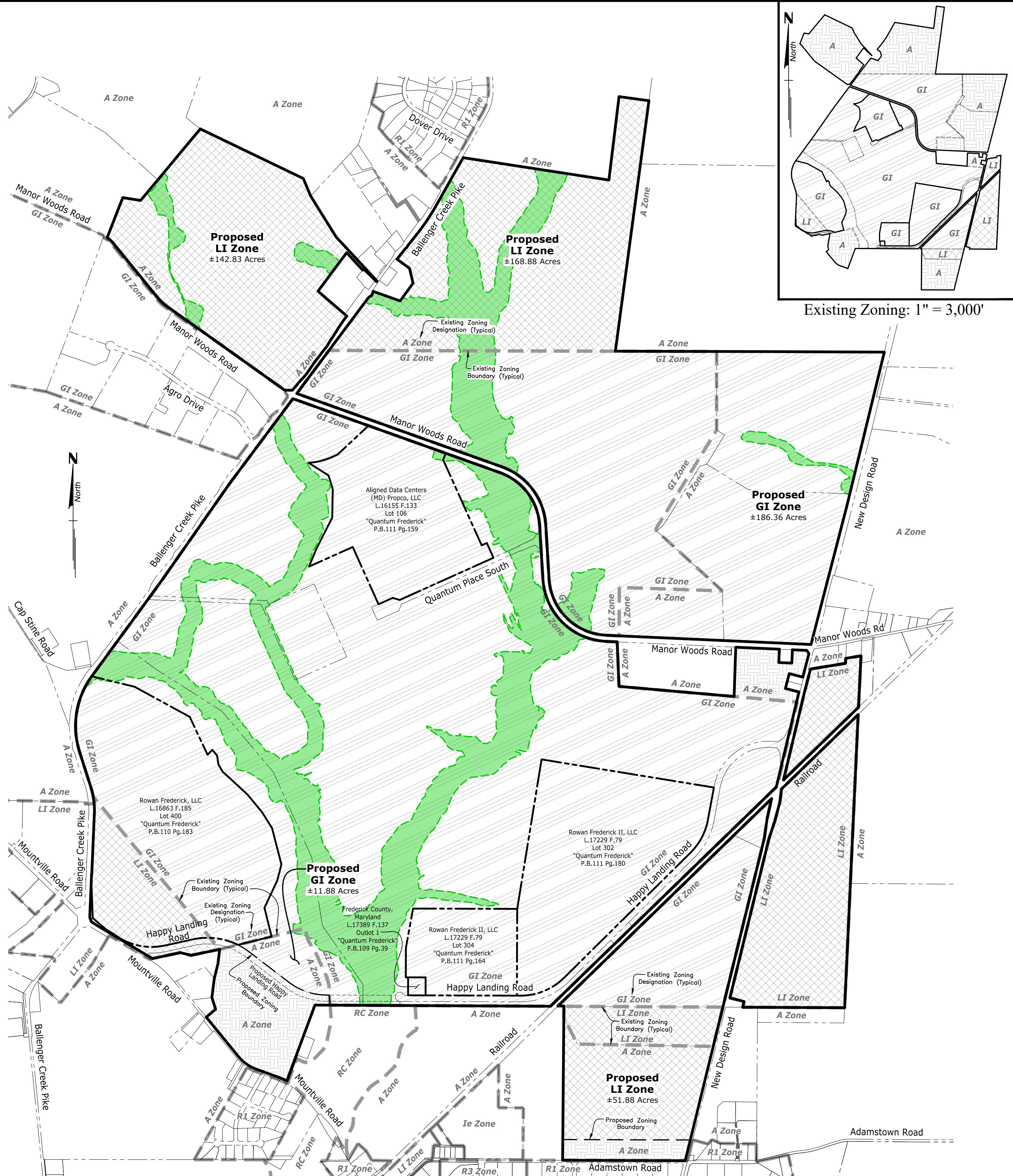
I hope this information is helpful to you, your staff and the Planning Commission in the creation of the CDI Overlay Zone and in updating the Comprehensive Plan and Zoning Map. Should you or any of your staff have any questions regarding the Properties, please feel free to contact me.

Very truly yours,



Bruce N. Dean

cc: Denis Superczynski
Karin Flom
Michael Kuykendall



Existing Zoning Tabulation (in Acres)

Existing Zoning Tabulation (in Acres)				
Owner	GI Zone	LI Zone	A Zone	Gross Tract
Quantum Maryland	995.67	134.83	619.76	1750.26
Aligned Data Centers	74.89	0	0	74.89
Rowan Frederick	262.57	33.21	0	295.78
Frederick County	1.22	0	0	1.22
TOTAL	1334.35	168.04	619.76	2122.15

Proposed Zoning Tabulation (in Acres)

Owner	*GI Zone	*LI Zone	A Zone	Gross Tract
Quantum Maryland	1193.91	498.42	57.93	1750.26
Aligned Data Centers	74.89	0	0	74.89
Rowan Frederick	262.57	33.21	0	295.78
Frederick County	1.22	0	0	1.22
TOTAL	1532.59	531.63	57.93	2122.15

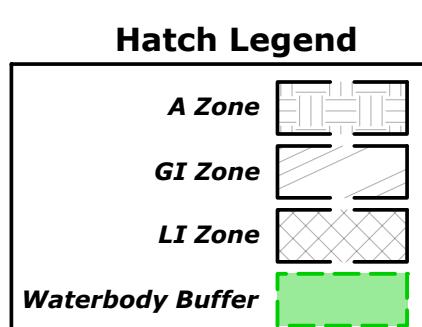


Exhibit of
The Property of Quantum Maryland, LLC, et al
"Quantum Frederick"
Buckeystown (1st) & Ballenger (23rd) Election Districts
Frederick County, Maryland
Scale: 1" = 800'

James, Karen

From: Elizabeth Law <bettybob1758@gmail.com>
Sent: Sunday, July 6, 2025 8:09 PM
To: Planning Commission
Subject: Comments to Planning Commission on CDI Zone Ordinance

Categories: Yellow category

[EXTERNAL EMAIL]

Chair Tim Davis, Vice Chair Mark Long and Commissioners,

Thank you for your recommendations to improve the Knapp/Young CDI Siting Ordinance. Sadly, the County Council chose to reject most of them when they were deciding what to include in the version later designated “Ordinance 25-05.”

Your recommendation to include a specific zone for data center development was a strong voice helping to convince County Executive Jessica Fitzwater and the County Council to announce on May 6, 2025, their intention to create a CDI Zone.

The CDI Zone Bill you will consider on July 9th is a good start but is unfortunately insufficient when considering the needs of county residents. The current bill proposes the area be “no larger than 1% of the county acreage” or about 4400 acres, including the former “Quantum Frederick” site. This expansion creates some problems given how the CDI Siting Ordinance (25-05) is written.

Noise From Data Centers

We note that the amended CDI Siting Ordinance (25-05) does not provide for noise testing at the conclusion of construction and prior to operation. It does not provide a resident hotline for complaints, nor does it provide any enforcement if the data centers exceed the 55 decibel limit that applies for roads and residential properties.

The CDI Siting Ordinance (25-05) states that the noise limit for a residential area is 55 decibels and 70 decibels for a data center with LI or GI zoning. But since the County Council added the amendment to the CDI Siting Ordinance to allow data centers within 500 feet of a residential area, data centers that close should demonstrate compliance to the 55 decibel level required for residential areas and not be allowed the 70 decibel limit for LI and GI zoned data centers. This should be specified to avoid ambiguity.

During the Planning Commission’s Site Plan hearing just 5 months ago, Rowen presented the results of its Noise Analysis study that showed that they would be in compliance with the 55 decibel limit everywhere except along the short stretch of Ballenger Creek Pike that is adjacent to their property. This demonstrates that meeting the lower decibel limit is within the capacity of the data centers.

In addition, we recommend that the county require all data center properties be required to install noise monitoring equipment at the location at the property's edge where noise is expected to be loudest, and to submit monthly reports to the County that show noise level as a function of time.

Lack of Available Power

We are both electric power engineers who deal in the hard facts of electric power and how systems are connected. With only the first two customers at the former "Quantum Frederick" site, the electric power required from the grid has already reached 800 megawatts. Additional data centers consisting of multiple buildings will require new transmission lines to bring more power. The more data centers that are approved the more new transmission lines that will be needed to supply their power.

Maryland is an energy desert. We import 40 percent of our power. The only option to provide so much power is to use the same transmission scheme as PSEG is using and bring out-of-state power. This will require eminent domain to take land. Multiple 500 kV transmission lines will crisscross Frederick converging within two miles of Adamstown. Some residents will either be 500 feet from data centers standing 75 feet high or have a 200-foot-high transmission line in their viewshed. (The County may provide some folks with both eyesores.)

All this will lower property values not only for the Adamstown/Buckeystown area but throughout Frederick County wherever the 200-foot-high transmission towers are sited.

It makes as much sense to expand the CDI zone beyond the Quantum Frederick site as it does to build a water bottling plant in the Sahara. All this is a magical thinking or at least an unwillingness to face reality or gather facts.

Meanwhile, utilities across the country are pushing back on these power demands. The public is rejecting data center building because of the bad reputation the industry has - for pollution, noise and disregard for its neighbors. This has been the experience of Hope Green, whose farm is adjacent to Rowan Bauxite I.

New microchips have become available that use far less power. Miniaturization or putting AI on all laptops could make the present data centers obsolete.

Frederick County may build it---but they may not come and they may not stay. Why is Amazon only renting here but investing permanently in Pennsylvania to the tune of 20 Billion Dollars? How long will it be before even Amazon leaves us? Will we be left with huge 75-foot-high building shells to dispose of?

The desire to gain tax money from new industry is understandable, but this objective must be balanced against the destructive impact of multiple massive projects. We don't know if this experiment in this dynamic industry will work for Frederick County. Wouldn't it be wiser to wait and see what comes of the available acres at the Quantum Frederick site before lunging ahead with a vast expansion plan?

Thank you,

Elizabeth Law, P.E. (retired)

1758 Wheyfield Dr.

William Steigelmann, P.E. (retired)

6113 Broad Run Road

Frederick MD 21701

Jefferson MD 21755

James, Karen

From: Steve Black <steveblack2313@gmail.com>
Sent: Sunday, July 6, 2025 9:15 PM
To: Planning Commission
Subject: Two letters from Sugarloaf Alliance re July 9 FCPC meeting
Attachments: SALettertoPConCDI070525.pdf; SALettertoPConIW2070525.pdf

Categories: Yellow category

[EXTERNAL EMAIL]

Commissioners,

Please find attached two letters from Sugarloaf Alliance regarding the CDI Overlay bill and the Investing in Workers and Workplaces plan. Both issues will be discussed at your July 9 meeting.

Thank you for your attention to these important matters.

Steve Black
President
Sugarloaf Alliance



July 5, 2025

Frederick County Planning Commission
Re: CDI Overlay Legislation

Dear Chairman Davis and Planning Commission Members,

Frederick County has been grappling with data center policy publicly for more than four years, and behind closed doors since 2019. The problematic aspects of data centers are by now well known. While it certainly merits repeating, the potential impacts of data center development on a neighboring community are clear. The Planning Commission continues to bear the burden of protecting residents and communities from the negative effects of industrial development.

As the Planning Commission and other county officials consider new comprehensive planning required by data center development, you are faced with a puzzle: how can you assess the text of a plan element without a geographic anchor for your analysis? The text of the bill makes plain that the overlay area can abut residential properties. Shouldn't those residents have an opportunity to weigh in on the text of the Overlay rather than months later when the map is released, and the terms of the Overlay are fixed?

Sugarloaf Alliance has been following the issue of data center development in Frederick County closely for five years. We offer these suggestions for the CDI Overlay.

Sugarloaf Alliance position on the CDI Overlay

1. The CDI Overlay should define a single, compact and contiguous area within the existing Eastalco Growth Area.

Almost all of this land is currently zoned industrial and is the most appropriate for data center development.

2. Data Centers should not be located next to residential land.

This was a Data Center Work Group recommendation, and a provision of CDI Siting Bill (25-05) until amended by Council. Experiences in Northern Virginia, and other locations, clearly demonstrate that data center operations are not compatible with residential land use.

3. The CDI Overlay should not be applied to any parcels currently within Rural Legacy, Priority Preservation, or Treasured Landscape areas.

While this is a provision of the CDI Siting Bill (25-05) there should be assurances that these protections will not be stripped from parcels within the CDI Overlay. The Overlay bill should contain an explicit prohibition on changing these land designations for the purpose of applying the Overlay. Such a prohibition is even more important given the as yet unknown geographic placement of the overlay.

4. Frederick County should not approve new Data Center site plans until a comprehensive cost-benefit analysis has been completed by an impartial third party.

Thus far, there has been only the industry sponsored Sage Report calculating additional gross revenue, but ignoring additional county expenses for infrastructure, increased electrical rates, and increased health care expenses. It is possible that future data center development might lead to little if any net benefit and potentially considerable costs for Frederick County residents.

5. Future data center development must not require establishment of new power transmission rights of way nor construction of new power generation facilities within Frederick County.

Outside of the CDI overlay zone, the data center industry should not be allowed to consume additional land within Frederick County nor should Frederick County residents be required to subsidize construction of infrastructure for this industry.

6. Future data center development must not require construction of additional water or waste treatment facilities funded by Frederick County taxpayers.

Frederick County residents should not be required to subsidize construction of infrastructure for this industry.

7. A Citizens' Advisory Group should be established to periodically review and monitor the implementation of the CDI Overlay, CDI Siting Bill, potential data center zoning violations (noise), and associated community concerns.

This group should have a majority of members without financial ties to either the data or real estate development industries to provide credible oversight of the data center developments. An Advisory Group would serve a unique role in both community outreach and as a conduit for public concerns.

8. In keeping with the practices of neighboring counties, Frederick County should establish a business property tax structure for data centers in order to offset additional data center-related costs to the residents of Frederick County.

Other surrounding counties in Maryland and Northern Virginia have tax structures that provide for significant revenue to the counties. Frederick County's business property tax rate is currently zero.

9. Prior to approval of any additional data center developments, emergency response plans need to be formulated and made open for public comment.

The potential fire threat that storage of many millions of gallons of diesel fuel within the CDI Overlay zone needs to be considered when approving these developments. The explicit language of the bill allowing dense data center zones adjacent to homes and communities makes emergency planning all the more critical.

Your discussions and recommendations regarding these and other data center policy and planning issues will strongly shape Frederick County's future. Thank you for considering this and other input from residents and businesses who will be most affected.

Sincerely,

Sugarloaf Alliance



July 5, 2025

Frederick County Planning Commission
Re: Investing in Workers and Workplaces Plan

Dear Chairman Davis and Planning Commission Members,

As the Planning Commission and other county officials consider new regulations and plans required by data center development, you are faced with a dilemma: making land use decisions and recommendations without comprehensive analyses of the data center industry's short- and long-term environmental and community costs and benefits.

The Investing in Workers and Workplaces (IW2) Plan appeared poised to restle with these issues. Following 6 Advisory Group meetings, three well attended public listening sessions, and hundereds of hours of staff time, we do not find answers to some pressing questions in the materials presented to the Commission thus far.

As you move forward with your work on the IW2 plan we urge you to directly address a wide range of looming policy and planning delemas.

**Sugarloaf Alliance comments on
Investing in Workers and Workplaces Plan**

Where is the analysis?

This planning effort was initiated in May of 2024 with the first meeting of the advisory committee composed primarily of land developers and other real estate interests. Most of the group's discussion was based on the presumption that the County has inadequate land for commercial/ industrial (C/I) development. Real estate interests suggested that the County C/I assessable base is only 22% and that it should be at least 28%. Where was the unbiased analysis? The committee's majority consensus (not unanimous) was that the only effective way to increase the C/I tax base share is to rezone 8,000 to 10,000 greenfield acres to C/I zoning.

Where was the analysis?

Over 100 pages of Power Point presentations were shared with the committee on economic development, tax base analysis, work force development, demographics, housing, construction permitting, agricultural preservation, public water and sewer availability and mapping of targeted areas. But in 6 meetings over the next 2 months the presumed shortage of C/I land was the main focus of the advisory committee.

The draft of the IW2 Plan presented to the Planning Commission on June 18 included no obvious reference to the 100 pages of information (available on the County's website) presented to the advisory group. Although the Planning Commission members (and later, County Council members) can access that background information, the June 18 presentation did not include this context which is essential to their decisions:

Commercial / Industrial land analysis

1. How much C/I land exists in the County?
2. How much C/I land is currently in use, how much remains, what is the vacancy rate?
3. What is the rate of consumption of C/I land?
4. How is the C/I land being used, and do these uses correspond with the County's economic development goals?
5. To what degree will the land involved in "municipal reconciliation" address the County's economic development needs and goals?

CDI overlay impact

1. What is the impact of the addition of the "Eastalco" overlay zone with its initial predicted development of 16 million square feet of data centers (Sage)? This could double to 32 million square feet with the projected overlay zone expansion.
2. Will the "Eastalco" project dominate the County economy? Will it make Frederick County the "data center capital of the State of Maryland"?

Work force analysis

1. What is the size of the County workforce?

2. What is the participation rate, do we have sufficient additional workers to expand C/I development?
3. What is the quality of the workforce to match future economic development?
4. Do we need new training/educational programs to match our economic development objectives?

Housing, transportation, and school analysis

1. Do we have sufficient housing for the County's future workforce?
2. Where and how does the transportation system need to be modified to accommodate future economic development?
3. How will proposed increases in the County's resident workforce affect school capacity?

Fiscal considerations

1. As noted in the Data Center Work Group report, should the County impose a business personal property tax on data centers in order to stay competitive with surrounding jurisdictions and provide relief to residential and other business tax payers?
2. Would the additional business personal property tax revenue from the data centers negate the IW2 assertion of the need to rezone the 8,000 to 10,000 acres of greenfields to C/I?
3. Are the County and State providing tax reductions, grants and other business attraction incentives to data centers and other C/I developments that will reduce potential added tax revenues?

Your discussions and recommendations regarding land use planning and economic development issues will strongly shape Frederick County's future. The nexus of data center development and comprehensive planning is critical to future land use and development patterns, costs and benefits. Thank you for considering this and other input from residents and businesses who will be most affected.

Sincerely,

Sugarloaf Alliance

James, Karen

From: Kathy Kinsey <kmkinsey@comcast.net>
Sent: Sunday, July 6, 2025 7:14 PM
To: Planning Commission
Cc: Karen Cannon
Subject: Mobilize Frederick Comments on Council Bill 25-09
Attachments: MF Comments_CDI Overlay Zone.pdf

Categories: Yellow category

[EXTERNAL EMAIL]

Dear Chairman Davis and Members of the Planning Commission,

In advance of the July 9th meeting of the Planning Commission, attached are comments from Mobilize Frederick on Council Bill 25-09, the proposed Critical Digital Infrastructure Overlay Zone. Thank you for the opportunity to comment on this important legislation.

Sincerely,
Kathy Kinsey

Kathy Kinsey
Chair, Government Affairs and Policy Committee
Mobilize Frederick
240-608-5954
kmkinsey@comcast.net



July 6, 2025

Tim Davis, Chair
Members of the Frederick County Planning Commission
Division of Planning and Permitting
30 North Market Street
Frederick, Maryland 21701

Re: Proposed CDI Overlay Zone Ordinance

Dear Chairman Davis and Members of the Planning Commission,

In advance of the July 9th Planning Commission meeting during which the proposed Critical Digital Infrastructure Overlay Zone ordinance will be considered, Mobilize Frederick hereby submits these comments and recommendations for amendments to the proposed CDI Overlay Zone and CDI Facilities Ordinances as they were introduced during the County Council's June 17th legislative meeting.

While Mobilize Frederick supports the concept of an overlay zone as a reasonable alternative to the floating zone proposed by the Data Center Workgroup, we have concerns about the proposed size of the overlay zone, provisions that would allow rezoning of agricultural tracts within Priority Preservation and Rural Legacy Areas to light or general industrial classifications to accommodate data center development, and proposed setback requirements for CDI facilities abutting residential property. Each of these concerns is discussed below.

The CDI Overlay Zone Should be Restricted to the Quantum Loophole Campus

The proposed ordinance would set a cap on the size of a single overlay zone around the Quantum Loophole (QL) campus equivalent to one percent of the County's total land – roughly 4,200 acres – roughly twice the size of the QL campus. Mobilize Frederick recommends a cautious and more incremental approach to establishing an overlay zone. At this early stage of data center development in the County, it is premature to expand the CDI Overlay Zone beyond the current QL campus footprint where site plan approval has been granted or is pending for only 25% of the 1,600 acres available for development (369 acres combined for two Aligned and the three Rowan Bauxite sites). Given the existing undeveloped capacity on the QL campus, for that reason alone, it would be prudent to refrain from further expanding the CDI Overlay Zone at the present time.

In addition, there are important unanswered questions about the economic, energy, and environmental impacts of data centers, e.g., the future availability of adequate electricity and water for cooling needs and the impact on the County's ability to achieve its climate goals and renewable energy targets. Expansion of an Overlay Zone beyond the QL campus should await the results of a comprehensive study on the economic, energy, and environmental impacts of data center development. Senator Lewis Young's data center study bill passed both chambers of the Maryland General Assembly this past session with strong support only to face a veto by the Governor. Consideration of a legislative override in January is possible. Whatever happens with the data center study bill, however, the results of a comprehensive impact study are needed to inform future policy making.

Finally, data center technology is evolving rapidly. Current technological uncertainties could shape the future development path of critical digital infrastructure in ways that we cannot anticipate. For these reasons, the proposed Overlay Zone should be limited to the existing QL campus.

Rezoning of Agricultural Land Located Within Priority Preservation Areas Should not be Allowed

Much of the land surrounding the QL site is located within Priority Preservation or Rural Legacy Areas and is not currently zoned for light or general industrial development. Agriculture is the leading economic sector in Frederick County and preservation of agricultural land is a key priority for the County to support local farmers, provide food security, and maintain the rural character of the County. With 75,000 acres of agricultural land permanently preserved to date, the County is barely halfway to its long-term preservation goal of 160,000 acres.

The proposed Overlay Zone Ordinance states the intention of the County Council to preserve an additional five acres of agricultural land for each acre of agricultural land within the Overlay Zone that is rezoned to LI or GI. This appears to be an aspirational goal, rather than an enforceable condition. It further allows for preservation of non-contiguous tracts and tracts that may be located in another watershed.

Rezoning of agricultural land located within a Priority Preservation or Rural Legacy Area for data center or other industrial or commercial development undermines the goals of the agricultural land preservation programs. It should not be allowed. Moreover, any change in the boundary of a Rural Legacy Area requires approval of the State Rural Legacy Board and the Board of Public Works. Rezoning and removal of tracts from Priority Preservation Areas could adversely impact recertification of the County's agricultural land preservation programs. See, [COMAR 34.03.03.11 \(Changes to a County Priority Preservation Area\)](#).

The Planning Commission Should Have Discretion to Increase Residential Setback Requirements

As initially introduced, the proposed CDI Facilities Ordinance banned CDI facilities on tracts that abut residentially zoned or designated land. As passed, however, the ordinance removed this prohibition, while requiring a 200-foot front, rear, and side yard setback from the property line of

any abutting land that is zoned or designated residential on the Comprehensive Plan Land Use map (Section 1-19-8-402 (B) (1) (c)).

A proposed amendment to the setback provision would increase the required residential setback to 500 feet. This should be a minimum setback, with discretion given to the Planning Commission to increase setbacks as necessary to mitigate noise (attributable to both operations and backup generators), light, aesthetic, and other community impacts.

Thank you for the opportunity to comment on the proposed CDI Overlay Zone Ordinance and amendments to the CDI Facilities Ordinance.

Sincerely,

KAREN CANNON
Executive Director
Mobilize Frederick

cc: Kathy Kinsey
Chair, Government Affairs Committee

James, Karen

From: Kim Westervelt <kim.westervelt@gmail.com>
Sent: Monday, June 30, 2025 9:40 AM
To: Planning Commission
Subject: Critical Digital Infrastructure (CDI) Overlay Zone - Sugarloaf District

Categories: Yellow category

[EXTERNAL EMAIL]

Dear Planning Commission of Frederick County,

The issue of data centers in Frederick County continues to be a quality-of-life concern for residents there. Current zoning allows data centers to be sited only in Limited or General Industrial Zones (LI or GI), but the advisory Data Centers Work Group (DCWG) of Frederick County recommended against allowing data centers "by right" in any industrial zone and it seems important to provide an additional layer of analysis and public input before site plans are approved, even in industrial zones.

I understand there will be hearings on the CDI Overlay Zone bill 25-09 in the coming weeks and I am concerned that full attention is not being directed to the problems and necessary analysis for these data centers.

I know that Governor Moore has taken action in support of data center development in Maryland and in Frederick County specifically. (In the recently completed legislative session, he vetoed the bill funding research into the effects of data center development in the state. Last year he asked for and signed the Critical Infrastructure Streamlining Act of 2024, overriding the Public Service Commission's concerns about the dozens of diesel generators commonly installed to power data centers during power outages.)

As a citizen living nearby in upper Montgomery County and a user of the Sugarloaf area for cycling and hiking, I have serious concerns about the effects of so many resource-intensive data centers in our county and state and stand with my Adamstown neighbors who now are threatened with expanded data center development. At this point, I worry

that the county is engaged in a kind of incrementalism that eventually will aim back at the Sugarloaf area.

Please oppose the legislation as currently proposed.

Sincerely,
Kendra Westervelt

James, Karen

From: David Burrier <burrierfarmsred@gmail.com>
Sent: Thursday, June 26, 2025 9:11 PM
To: Planning Commission
Subject: Fwd: "Honorable Members of the Frederick County Planning Commission, on..."

Categories: Yellow category

[EXTERNAL EMAIL]

Honorable Members of the Frederick County Planning Commission, on behalf of Fredrick County Farm Bureau we would like to speak to several strong concerns we have regarding the CDI overlay bill.

1. Almost all the land ajacent to the Quantum Loophole land designated for data centers is either in a Rural Legacy Area or a Priority Preservation Area. If any of this land would be included in the overlay zone and taken out of the county PPA program, it would trigger a review of our Certified Status. That means it could cause Fredrick County to lose its Certification if land is taken out of the PPA. Maintaining this Certification allows us to retain 75% of the locally generated Ag Transfer Tax as opposed to only 33% that uncertified counties retain. We use the ag transfer tax funding to fund the MALPF program. Up until this time Maryland has had the most-aggressive land preservation program in the United States, but it is already severely impacted by removing 20 million dollars from its budget to balance the state's budget shortfalls. Also, this will severely impact the trust in these programs and start a chain of events where these programs will not grow in the future. In Maryland, every acre counts with regards to the preservation of farmland, and each and everyone of these programs will severely jeopardize all future preservation.
2. Frederick County Farm Bureau feels that concentrated development of these data centers should be where infrastructure exists to support it. The huge need for electric power and water should be addressed before any property is up zoned, since there is a concern that allocated power and water are already maxed out in the existing CDI complex. We feel an APFO type of review of power and water is extremely important to getting this right. The strategy of these needs are at the forefront of this bill moving forward.
3. Another major concern is the 200ft setback from property lines, which we feel need to be increased. Thank you for the amendment to the Overlay Bill. We would also applaud the County Executive for putting a pause or freeze on this industry. Hopefully, this allows time to get it right, as Frederick County is setting a precedent for the state. This industry needs to minimize its impact on neighboring homes, businesses and farms with regards to the noise levels produced by the data centers. Two very sensitive areas which include the Carroll Manor Elementary School, and also the St. Joseph's Catholic Church absolutely need a larger setback since they are almost entirely surrounded by the Quantum parcel that would very likely to be included in the overlay zone.
4. In conclusion FCFB would like to thank you for the 1 to 5 acre replacement funding proposal. It is upmost importance that the community benefit is in this agreement. We recommend strongly that the county use this funding to preserve farmland somewhere in the county, be targeted to the existing Rural Legacy and Priority Preservation Areas. Again the Adamstown area is some of the best soils in our county, and that the replacement funding would preserve the most productive soils these dollars could invest in.

Respectfully submitted,

Frederick County Farm Bureau

David Burrier, President

James, Karen

From: Theresa Furnari <tafurnari10@gmail.com>
Sent: Tuesday, July 8, 2025 2:15 PM
To: Planning Commission
Subject: Council Bill 25-09 Critical Digital Infrastructure Overlay Zone

Categories: Yellow category

[EXTERNAL EMAIL]

Dear Planning Commissioners: I write to request your assistance in creating guardrails around the Council's proposed overlay zone. The 4500 acres proposed is neither necessary, a waste of resources and will cause irreparable harm.

Not necessary: Currently there are 1200 acres already zone industrial and unused and able to accommodate new Data Center Development. Additional acres are not necessary.

Wasted Resources: Expanding the acres to accommodate more data centers will result in wasted resources. The value of data centers will diminish. Data Centers are being built all over the world, and supply will eventually exceed demand. This will reduce the value of data centers, and data buyers will shop around for the least expensive source. Frederick County will not be the cheapest source of data in the world. The data centers will negotiate with us for tax breaks until we can't give any more, and then the companies will leave. Additionally, technology may reduce the need for so many data centers. Using history as our guide, we have witnessed much smaller computers having the capacity to hold and process much more data. Therefore, the space needed to store and process information will be reduced and the need for so many data centers will be reduced as well.

Irreparable Harm: Once the buildings are built and then left empty, the rural character of our beautiful county will be changed forever. The once agricultural land will be unfarmable for anybody. The land will be further stripped of valuable environmental forests. The demand for water, which is already overburdened, will become insurmountable and then left polluted. Because of the inordinate amount of electricity that is used by data centers, the County will be left littered with transmission lines that were to supply electricity. Residents living within 500 feet of the proposed overlay will be deprived of their once quiet bucolic view, to be replaced with abandoned 75 feet high buildings, concrete and metal fences. If they have not already moved, how many will eventually leave?

All over the country, there are failed experiences of rapid data center development. Please don't let this happen to Frederick County.

Thank you.
Theresa Furnari, JD. Retired
4210 Mountville Road
Jefferson, Md. 21755

James, Karen

From: Barbara Luchsinger <blagluch@gmail.com>
Sent: Tuesday, July 8, 2025 9:49 AM
To: Planning Commission; County Executive; Council Members
Cc: barbara luchsinger
Subject: CDI Overlay

Categories: Yellow category

[EXTERNAL EMAIL]

Dear Officials,

As a longtime landowner and resident of erstwhile rural Urbana, please, all of you, do everything to honor and preserve the areas in the Rural Legacy, Priority Preservation and the Treasured Landscape when you consider the CDI overlay. No one-off should be permitted to occur in the foregoing areas. One toe-hold is an invitation for more.

Montgomery County has managed successfully to preserve its notable ag area, so we know it can be done. I ask that you do the same here to preserve the beauty and serenity as development attempts to claim every inch possible.

Sincerely,

Barbara Luchsinger

James, Karen

From: Brian Sweeney <briansweeney8911@gmail.com>
Sent: Monday, July 14, 2025 10:40 AM
To: Planning Commission
Subject: CDI Overlay

[EXTERNAL EMAIL]

Planning Commissioners,

I am a citizen of Frederick County who farms on my family's operation outside of Adamstown. I served on the data center workgroup as the Farm Bureau representative and have been vocal in the legislation regarding CDI since then. I want to express my appreciation to the planning commission for their efforts regarding the review of data center legislation, acknowledging public input and asking the important questions. After watching the meeting on wednesday I felt compelled to email the planning commission with my notes.

The selection of this area in the county as ideal for data centers began with the recognition of a brownfield site within 2,200 acres of the former east alcoa property. However, the brownfield and developed portion of the property was only 200 acres. The remaining acreage was agriculture or forested even though approximately 1,600 acres is zoned Light Industrial or General Industrial. Only this industrial zoned portion of Alcoa/Quantum is inside of the current growth area but there is additional acreage outside of the growth area in a Rural Legacy Area and Priority Preservation Area. An area so important to the agriculture industry and the next generation of farmers that the county and the state have placed two designations here to limit development and promote conservation. Please ask why we need to rush and destroy the integrity of these designated preservation areas by expanding beyond the existing growth area before we know the effects of the industry on our citizens.

When you are shown the proposed map of the CDI overlay please keep in mind the importance that has been placed on our preservation areas. The data center workgroup unanimously voted to keep data centers out of the Rural Legacy Areas, Priority Preservation Areas and Treasured Landscapes. We certainly did not think the county executive would interpret this as protecting these areas AFTER redrawing the boundaries to suit the needs of the data center industry. The current county legislation regarding CDI restricts data centers in these preservation areas. The proposed legislation reinforces this and county staff list avoiding preservation areas as a main goal in all their presentations. The proposal of expansion of the alcoa growth area into RLA and PPA is most certainly disingenuous since it contradicts everything presented prior to the mapping exercise.

The explanation given to the public as to why we need the overlay is "certainty for the data center industry" before they invest here. I agree that a level of certainty is needed in all industries. The Rural Legacy Areas and Priority Preservation Areas have given "certainty" to the agriculture industry and the rural communities for the previous 30 years. There is no reason that the needs of the CDI industry should be placed above agriculture, the largest industry in the county and essential to the life of all citizens in Frederick County.

The 5 to 1 acreage proposal in the community benefit agreement is admirable, but from comments made by legal representation at your previous meeting state that "there's no requirement that somebody do

that, it is a goal" and "we're relying, I guess, on the good graces of the developers". This is clearly unenforceable and it is appalling that legislation is being considered where the government relinquishes power to the developers. Prior to this announcement neither the county executive nor the county council members asked the opinion of any agricultural organizations. This includes the county executive's own Agricultural Business Council or the Frederick County Farm Bureau. As I proudly serve in both of these organizations I know that both have written letters expressing their concern with the redrawing of the boundaries associated with the preservation areas. If consulted I would have expressed the importance of protecting the integrity of the Rural Legacy Areas and Priority Preservation Areas over this unattainable dream of 5 to 1 and I would undoubtedly have the support of the majority of the agriculture community. While our elected officials are claiming to support agriculture through a clearly flawed goal for preservation, no one has explained how this map and the loss of acreage in our designated areas will lead to a loss of certification with the state. Certified counties retain 75% of the Ag Transfer tax while non certified counties retain only 33% of this tax. So our preservation programs and the agricultural industry will ultimately suffer with the destruction of our preservation designated areas because of a shell game played by our elected officials that places the CDI industry above agriculture, the farmer and our rural communities. I am deeply concerned with the fact that staff failed to mention this as a potential outcome of these decisions.

I also have concerns with other statements given by staff during your meeting. Regarding the concern about overlap between preservation areas and growth areas it was stated that light industrial properties existed in the Rural Legacy Areas. I urge you to verify this before taking it as factual. To my knowledge there is only one property in the alcoa growth area that is only in the comprehensive plan for light industrial but currently zoned agricultural and a portion of this property is in the Rural Legacy Area. The fact that you were led by staff to believe inconsistency abounds in the planning areas is deceitful. Another goal of this legislation is for CDI to stay where infrastructure exists. However it is a fact that two important resources, water and power, are not more readily available here. If the county council cannot consider the power demands of industry when it comes to property zoning to protect its citizens, how can it be falsely used as a goal of this comprehensive planning exercise? A representative of First Energy spoke to the data center workgroup and we know that the existing energy infrastructure will not be able to support the development of data centers on the 1,600 acres of industrial ground on the quantum property that is available right now for data centers. It is grossly irresponsible to suggest an expansion of the overlay outside of this area.

Finally, it was discussed during the previous meeting that 75 foot tall structures and a setback of 500 feet is an insufficient distance from this nuisance. Also considering that current testing requirements are extremely lenient and favorable to the CDI industry, the residents of these rural communities are extremely at risk. Please consider during your discussions that a buffer currently exists for rural residents with the current growth area boundaries and the bordering Rural Legacy Area and Priority Preservation Area designations. You can clearly see on the maps that maintaining these existing boundaries is a simple and responsible approach to protect the residential areas. Redrawing boundaries at this moment benefits only a few at the expense of many. Thank you.

Brian Sweeney
Calico Farm

James, Karen

From: peterblood3213@comcast.net
Sent: Thursday, July 10, 2025 9:14 AM
To: Planning Commission
Subject: Fire at Eastalco?

[EXTERNAL EMAIL]

Commissioners,

I am writing to express a serious concern about data centers that has not received sufficient public discussion. As you know, the backup diesel tanks planned for the Eastalco site will collectively hold millions of gallons of diesel fuel. This will make Eastalco one of the largest concentrations of diesel on the East Coast.

The tanks are planned close enough that there is a risk of cascading failure, that is, an explosion in one tank could ignite others. While the likelihood of such an event may be debated, the consequences would be catastrophic so it would be irresponsible not to take this risk seriously in the emergency planning process.

A disaster of that magnitude would be beyond the capabilities of the Carroll Manor Volunteer Fire Company, the closest fire department, beyond the county's experience, and would likely test the fire service capabilities at even the state level.

I urge that an emergency plan be developed, but also recognize that a plan is not enough. I recently watched the *Frontline* documentary *Fire in Paradise*, which chronicles the 2018 Camp Fire in Paradise, California. That fire was the deadliest and most destructive wildfire in California history (85 lives lost, 13,972 homes destroyed). Some people burned to death in their cars, caught in traffic gridlock as thousands tried to escape at once. But here is the tragic irony: Paradise had an approved evacuation plan, but they failed to anticipate the speed and scale of the fire they ultimately faced.

There is an urgent lesson here: a plan is only as good as the people who write it and the scenarios they plan for. Frederick County cannot afford to underestimate the scale of a potential disaster at Eastalco. We need expert help. Therefore, **I urge the County to:**

- 1. Require the development of a comprehensive fire and emergency management plan specific to the Eastalco site that includes review and input from outside experts** such as the National Fire Protection Association, Firewise USA, the U.S. Fire Administration, Ready.gov (FEMA), the National Interagency Fire Center, and the Maryland Department of Emergency Management.
- 2. Require data center operators at and near Eastalco fund their own dedicated fire and emergency response services**, proportional to the unique risks their operations pose.
- 3. Establish an independent safety review board** composed of fire science, chemical storage, and environmental experts to audit the site's risk profile and emergency readiness every five years.
- 4. Ensure full public transparency of the emergency planning process**, including opportunities for community input and publication of key plan documents.

To safety protect the residents of Adamstown, Frederick County cannot simply plan for what is likely, but for what is possible.

Sincerely,
Peter Blood
Urbana MD

James, Karen

From: Nick Carrera <mjcarrera@comcast.net>
Sent: Friday, July 11, 2025 10:24 AM
To: Planning Commission
Subject: Comments on data centers and the overlay

[EXTERNAL EMAIL]

Dear Commissioners,

I'd prepared the following few paragraphs as a letter to the editor. My experience has been that the FNP always has a backlog; even if your LTE is accepted it will be many weeks before it's published, by which time it is no longer "timely." That's likely with what I've prepared below, but it may be of interest to you (I hope it will), as background for your consideration of Overlay maps at your next meeting, July 16. I've added further comments specifically on the Overlay maps you won't be seeing, but that might be useful.

A rush is on to build data centers. They've overcome parts of Virginia, are popping up all over, and are getting bigger – in June the *NY Times* reported a 1200 acre Amazon super-center going up on Indiana farmland. Frederick County has been trying to proceed responsibly, but developer pressure to move fast has been intense. Quantum Loophole acquired about 2100 acres near Adamstown in June 2021, on which about 1600 acres might be developed. By 2024 two companies, Aligned and Rowan-Bauxite, had committed to build 15 data centers there, on lots totaling almost 400 acres.

In response to concerns about data center sprawl, officials decided on May 6 to confine data centers to Quantum's 2100 acres and to allow up to another two thousand acres or so adjoining Quantum to be reserved for more data centers. Thus over four thousand acres there could be devoted to data centers. This, even though no active interest has been reported for data centers beyond those noted above.

Data centers have huge appetites for power and water. Power planning is regional and beyond county control. Without assurance that adequate power will be available in time, the county should be cautious in committing yet more land for data centers. Some argue that the contemplated Overlay zone at the Quantum site should, for now, simply enclose the existing Quantum property, and allow for future expansion if warranted by the pace of data center construction. This is a prudent approach. We are already adversely affected by the overbuilding in Northern Virginia, which has prompted PSEG to seek to build its MPRP "extension cord" through Frederick and other Maryland counties to bring power from Pennsylvania to the new Virginia data centers. With the regional competition for energy, building them in a hurry could leave us with centers that take up usable land but may wait for years before they have power to operate. Frederick County should also do an adequate analysis of the *net* financial benefit it can expect. Its only study thus far was of the expected *gross* revenue, with no assessment of the additional expenses data centers will entail.

Data centers at the existing Quantum property is a "done deal." The land was purchased in 2021, a total of 15 data centers were approved in 2024, and many of them are now under construction and already making nearby residents unhappy. The county should go slowly, gaining experience from the

commitment already made, assessing if benefits to the county are all their promoters claimed they would be. An expanded Overlay can be contemplated later, once we've digested what's already been swallowed at the existing Quantum.

Comments on the maps prepared by county staffers.

The maps in the 47-page report are detailed on various important issues. I'd expected, though, that the starting point would be a map of the current Quantum property and another map that showed clearly what additional parcels were being proposed as additions. They aren't there, but I can help you construct them.

Existing Quantum property. Look at the county's Tax Map 94 labeled "Zoning" (not the Comprehensive Land Use Plan). The bulk of the Quantum property is the dark purple area between Ballenger Creek Pike and New Design Road, plus the unnumbered white parcel that "fills in" the northeast corner of the dark section, plus parcel 0003 to the north of the dark area, plus white parcel 0076 that lies west of Ballenger Creek Pike, plus some small extensions on the south side, extending into parcels 0007 and 0028, plus the unnumbered lilac-colored parcel on the southwest corner (that's where Rowan-Bauxite construction has prompted many complaints), plus the lilac-colored parcel 0056 to the east of New Design Rd. As Tom Natelli pointed out at your July 9 meeting, the present Quantum property is a mix of commercial and agricultural, and attention will be needed, to be consistent with the requirement that data centers be only on LI or GI land.

Proposed to complete the Overlay. Now, for the land to make up the full Overlay. Again looking at the county Tax Map 94 labeled "Zoning," here are the main parcels that staff has proposed be added to complete the Overlay: to the northeast of the dark area -- parcel 0004 and parcel 0003 that lies above it on Tax Map 85. Both these are owned by Don Pleasants, and it's his upper parcel, number 0003, that abuts a residential area and needed that change in bill 25-05 in order to comply. The dark area west of Ballenger Creek Pike is another area proposed for the Overlay; the western end is parcel 54 -- 64.38 acres owned by Natelli. The last big part of the proposed Overlay is parcel 0012, also west of Ballenger Creek Pike. This is the Windridge Farm, and they'd tried a couple of years ago to be rezoned. I make the total of the additions to be about 750 acres.

I hope this helps.

Nick Carrera; 2602 scenic Thurston Road, Frederick

James, Karen

From: Thomas Barse <tombarse3@gmail.com>
Sent: Wednesday, July 9, 2025 1:32 PM
To: Fitzwater, Jessica; Young, Brad; Keegan-Ayer, MC; Duckett, Kavonte; McKay, Steve; Knapp, Renee; Donald, Jerry; Carter, Mason; Planning Commission; Peterson, John K.; Stevens, Katie; Carpenter, Deborah
Subject: Proposed overlay map - digital infrastructure
Attachments: Proposed CDI Overlay 2025.docx

[EXTERNAL EMAIL]

President Young, County Council Members,, and Planning Commission Members:

Please find attached a letter from the Frederick County Agriculture Business Council concerning the proposed digital infrastructure bill and proposed overlay map.

Tom Barse,
Vice Chair, Frederick County Agriculture Business Council

July 1, 2025

Winchester Hall
12 East Church Street
Frederick, MD 21701

Dear President Young, County Council Members and Planning Commission Members,

On behalf of the Frederick County Agriculture Business Council (ABC), I would like to provide comments on Bill 25-09, the proposed Critical Digital Infrastructure Overlay Zone.

The ABC is tasked with reporting to the County Executive and County Council information pertinent to county business, economic development, and the challenges, opportunities, and resources within Frederick County's agricultural industry. It is our responsibility to advocate for initiatives that promote the vitality of our agricultural sector and safeguard our valuable farmland. On Tuesday, June 24, 2025, the ABC voted unanimously to provide feedback on the proposed bill.

First and foremost, we would like to express our strong support for the five-acre for every one-acre community benefit mechanism, which aims to generate additional funding for Frederick County's Agriculture Preservation Programs. This proactive measure will assist in preserving farmland for future generations and aid the County in achieving its goal of 160,000 acres preserved by 2051.

However, the ABC would like to raise concerns regarding the potential for this bill to permit the redrawing of Priority Preservation Area and Rural Legacy boundary lines. We believe this sets a significant and adverse precedent for the community. Frederick County is endowed with a rich agricultural heritage, and it is crucial to undertake proactive measures to safeguard our farmland and preservation boundaries for future generations. Land preservation is vital not only for the economic sustainability of our farming community but also for maintaining the scenic beauty and environmental health of our county.

Additionally, we wish to address concerns related to water and power consumption and would strongly support the addition of an Adequate Public Facilities Ordinance style review.

We appreciate your time and consideration of our comments on Bill 25-09 aimed at protecting the agriculture industry as a key economic driver in Frederick County and preserving the County's designated preservation areas.

Sincerely,

Tom Barse
Vice Chair-Frederick County Agriculture Business Council

cc: Jessica Fitzwater, Frederick County Executive
Kavonte Duckett, Frederick County Council Member
M.C. Keegan-Ayer, Frederick County Council Member
Steve McKay, Frederick County Council Member
Renee Knapp, Frederick County Council Member
Jerry Donald, Frederick County Council Member

Mason Carter, Frederick County Council Member
John Peterson, Chief Administrative Officer
Katie Stevens, Director, Office of Agriculture
Deborah Carpenter, Director, Division of Planning and Permitting

James, Karen

From: Faith Klareich <faith@klareich.com>
Sent: Tuesday, July 8, 2025 5:43 PM
To: Planning Commission
Cc: Council Members; Council Members
Subject: Planning Commission Review of DC Overlay
Attachments: Planning Commission Submission July 2025.docx

[EXTERNAL EMAIL]

Attached, please find my recommendation for the consideration of an allotment of land for quantum computing facilities in the data center overlay. I have outlined the level of investment and leadership attention happening in our state for quantum computing technology today. It is not hard to imagine early deployments happening in 2030 and beyond—only 4.5 years away. This reserve should be demarcated as such. We should be prepared to **NOT** take those facilities beyond the overlay perimeters. Thank you for your consideration, fhk

Planning Commission Submission on Overlay Ordinance

July 2025

FROM: Faith Klareich, 718 Canal Town Road, Brunswick MD

RE: Recommendation for a reserve of land within the suggested Data Center (DC) Overlay to be set aside for Quantum Computing (QC) facilities.

Scholars for decades have examined policymaking to determine best practices and see how effective legislation really is in solving certain types of problems. The concern is that by the time the legislation is passed, the problem has morphed into something else with new or different challenges. This is especially true for emerging technology. How we think things will advance and how they actually advance is never a 1-1 match.

Given that experience, I strongly suggest that you consider the timeline being projected for the emergence of QC. By the beginning of the next decade, early applications though limited are expected to enter the market. They will be applied to a few applications. Think about it. It is only 4.5 years from today. Now also remember how many years we have been developing multiple ordinances on DCs. Does the date March 16, 2022, ring a bell. It was the passage date of our first DC ordinance and here we are today still passing ordinances. How many months prior to March 2022 did we begin work on that first ordinance! We are almost 4 years in the making with more to be done!

You may say why worry about the emerging phase of QC technology... well because our governor has made it a priority by calling for a \$1 billion dollar investment in a public/private partnership putting Maryland at the center of worldwide advancement in QC-- involving the University of Maryland, IonQ and others. Just this week IonQ announced that a private equity firm has invested \$1 billion. The goal is to achieve effective QC networking by 2030.

Where are early adopters likely to be located? I'd say Frederick will be an attractive option given its experience by then in DCs and AI.

Here is what we know about QC today. It will have a smaller footprint than DCs. It will require extreme cooling, vibration control and electromagnetic shielding. ***Do we really want to fight again about where in the county these facilities should be located.***

While we have the time to learn more about this technology, let's devote a portion (10-15%) of this data center land (that has some restrictions) to quantum computing. Let's not do tomorrow what we have done today. We may have to be quicker and more nimble when the industry knocks on our door. If we have a starting point – an allocation of land-- that part of the fight will be off the table.

James, Karen

From: Patrice Gallagher <pgallj@aol.com>
Sent: Tuesday, July 8, 2025 6:18 PM
To: Planning Commission
Subject: CDI Overlay / comments
Attachments: PC.CDI.overlay.7_7_25.pdf

[EXTERNAL EMAIL]

Hello,

The attached document contains my comments for the Planning Commission members regarding the CDI Overlay comprehensive plan text amendment.

Thank you for your attention and consideration.

Patrice Gallagher
Frederick

Patrice Gallagher
Gallagher Design
www.patricegallagher.com
102 W Church Street
Frederick MD 21701
301.471.3720

Dt: July 7, 2025
Re: CDI Overlay
Fr: Patrice Gallagher, Frederick

Dear Chair Davis and members of the Planning Commission,

I'm writing re: the CDI Overlay comprehensive plan amendment that you'll have before you on July 9.

I've previously written to you to express my support for a floating zone or hybrid overlay zone, and was gratified when I saw the May 6 announcement by the County Executive and Council of a new CDI Overlay Zone.

But as I've attended the Council meetings and learned more about the overlay proposal, my feeling about this proposal is that it raises many questions that should be answered before the overlay zone is added to the comprehensive plan. It is frustrating to feel that our County is pressing ahead with data center development, even though there are so many unanswered questions.

The first and — to me — most important question to answer is: what are the financial or other costs and benefits of data center development, for the County and its residents? Unfortunately, Karen Lewis Young's Data Center Study bill, which would have provided us with unbiased answers to that question, passed the Maryland House and Senate with bipartisan support, but was vetoed by Gov. Moore. Perhaps the veto will be overridden, but until an unbiased report is done, we are flying blind with regard to the benefits and detriments of data center development.

In an online video, CE Fitzwater says, "We've built strong protections for our residents into our laws, while allowing for investment and development that will create good paying jobs and generate revenue for the County." **But where is the data to back up that statement?**

Next, there are statements that the County Executive and staff have made publicly, for example on the County's website — please see bulleted items below. **In bold text below the statements are my questions.**

From the County website:

Introduced as a comprehensive plan amendment, the [proposed CDI Overlay] map is based on three key factors:

- Data centers should be limited to the area around the Eastalco site, where infrastructure exists to support it.
 - **Actually, even if confined only to the Eastalco site, there is not enough infrastructure (particularly power and water) to accommodate data center development. Why allocate even more acreage to data centers if we can not currently build out even Eastalco, due to infrastructure constraints?**
- Data center development should be limited to less than 1% of the county's total landmass.
 - **One percent of the County's total landmass is about 4,400 acres. What is the 1% number based on? Why was that amount of acreage chosen?**

Beyond determining the reasons for 1%, that is a lot of data center development in the Adamstown area! Again, why allow for that much acreage to be set aside, until we see how things progress at Eastalco first?

The people of Adamstown certainly think 4,400 acres is too much data center development. I suspect you've watched the June 17 County Council meeting about the overlay, in which farmers and homeowners and others expressed their disappointment and opposition to the CDI Overlay Zone being located in their area.

Here is a link, if you have not seen the Council meeting and Adamstown's residents:

https://frederick.granicus.com/MediaPlayer.php?view_id=10&clip_id=10345

- For every new acre turned over to data center development, the County should preserve five acres of farmland.
 - According to Director of Government Relations Victoria Venable's presentation on May 27, legally, this factor can only be expressed as an "intention" and can't be written into law. Do we know, therefore, that this will happen (no matter who is in office) and what the specific mechanisms will be to make it happen?

I'm aware of the thorough analyses of other residents, like Kevin Sellner, Betty Law, and Bill Steigelman, that should make us think long and hard about the water, power and noise issues that data centers bring with them. The beautiful viewshed can't help but be compromised by buildings that are 75 feet high. Environmental impacts, like loss of farmland in the Adamstown region (as farmlands are rezoned to LI or GI so to be sold for data centers) or impacts brought about by transmission lines required by data center development — all of these factors must be taken into serious consideration before our County government plunges ahead in this arena.

Why NOT go slowly? Let's take our time, be prudent, and understand the benefits and drawbacks as we build data centers in our midst. These developments have been the bane of many communities' existence — not just Loudoun County's — and we'd do well to proceed carefully.

Many thanks for your consideration of my comments here, and many thanks for your excellent recommendations to improve CDO Ordinance 25-05. Your work is much appreciated!

Patrice Gallagher
115 E. 5th Street
Frederick, MD 21701

James, Karen

From: Annette Tinder <adtinder@verizon.net>
Sent: Monday, July 14, 2025 4:37 PM
To: Planning Commission
Subject: Community Input on Smart Data Center Overlay Planning

[EXTERNAL EMAIL]

Dear Planning Commission,

Thank you for your hard work in developing a data center campus and overlay plans for Frederick County. In my opinion, data centers are a better alternative than more traditional manufacturing or industrial uses. Now is the critical time to listen to those community members who are directly impacted and living next door to the data center campus. I propose:

Community-Focused Development

- Many times developers and building owners are required to earmark funds for community development and preservation. I recommend requiring them to allocate funds for community amenities, such as a park and/or public access to the Carrollton Manor House. This initiative would enhance community well-being and preserve local heritage.
 - There are 28 acres given to Carroll Manor Rec Council by East Alcoa adjacent to the CMES. It's my understanding that this is not large enough for Frederick County Parks and Recs to develop on its own. I suggest that collaboration be required among all stakeholders to create a park, with community input on amenities.
- Ensure that there is public access to the historic Carrollton Manor House.
- For areas that the County Executive is reclassifying or removing from the data center overlay to general industrial, please work to bring them back into the overlay. General industrial can be much more intrusive and harmful to the community by having added light pollution, environmental pollution, 24/7 operation, a large amount of truck traffic.
- Please continue to include protections in the building code protection for the night sky, noise and vibration reductions, and masking of the data center campus with trees and berms.
- When traffic studies are completed and proposals are made, ensure community input so that a traffic light is not blinking into someone's bedroom or home 24/7.

Enhanced Agricultural Preservation in Adamstown/Buckeystown

I advocate for a stronger incentive structure for preserving agricultural land, specifically in Adamstown/Buckeystown. The current proposal suggests preserving 10 acres of non-preserved agricultural land for every acre converted to industrial use within the data center overlay. By prioritizing preservation efforts in Adamstown/Buckeystown, our community can benefit more significantly from this requirement as we will have a concentrated area of industrial development, ensuring that agricultural preservation is addressed effectively before other areas in the county.

Thank you for considering these suggestions. I believe they will help balance development with community needs and environmental sustainability.

Best regards,

Annette Tinder
Adamstown, MD

James, Karen

From: Mark Sankey <markrsankey@gmail.com>
Sent: Monday, July 14, 2025 3:36 PM
To: Planning Commission; Council Members; County Executive; Venable, Victoria
Subject: CDI Ordinance and Overlay Zone
Attachments: Overlay and Finish.docx

[EXTERNAL EMAIL]

Appreciating your work, the finish line for this is in sight. Hang in there. My comments attached.

Mark Sankey
Frederick, MD

CDI Policy and Regulation

I applaud all of you who have worked and continue to beat into shape our County framework to manage CDI development. As was said, we are getting tired of talking about data centers. The finish line is in view. Hang in there.

We are on sound footing because we are limiting our County's contribution to the proliferation of AI. Let's all understand that AI simply makes data analysis faster. It's use to foster intelligence is foolish. AI can be a useful tool but speed and efficiency ought not be priorities. We are seeing what an efficiency effort has wrought in the Federal government. Chaos. Artificial intelligence is "artificial" by definition. It can hinder mental development and can stifle creativity.

With all of the concerns that have been aired, I am pleased with the resulting concept of a cap on the extent of area that can accommodate data centers and application of an overlay zone. Limiting the extent of data centers limits its impact on the environment and does the most we can do as a County to address concerns of water and power supply issues. The detailed, complex process we have created for regulation and ordinances is time and energy consuming. I am gaining an education as I follow the process. I was reminded of my own experience as point man in technical negotiations for engineered industrial systems. I encourage you to take time to recreate.

I was pleased to hear that the proposed overlay zone is far less than the 4400 acre County-wide cap. Many of us would like to see it limited to the areas already permitted for data center construction. I see that as unrealistic and accept the current concept. At the July 9, 2025 Planning Commission meeting, a provision was recommended to allow the Planning Commission to require greater set back from residential properties for visual impact, lighting and other community impacts. A greater offset to preserve agricultural land was also recommended. Simple and direct. I hope for the County Council to consider these carefully.

I recognize the need for revenue. Many studies conclude that long term economic return is best served via industries other than data centers. Digital computing technology is changing rapidly and I suspect the output of the centers being built now will increase. Newer faster machines will replace the current ones. The buildings now going up may not be readily renovated for quantum computing. Focus on other industries which bring higher levels of employment and more satisfying work. Please. Don't be fooled by the marketing of "artificial" intelligence; "virtual" reality is not real. You cannot touch it with your hands. I was disappointed that Coin Base is a tenant of Rowan. It is not a cryptocurrency mining operation but supports that business. Cryptocurrency has no real, verifiable economic benefit and is a terrible hog of electric power.

Thank you for reading and serving the community.

James, Karen

From: sbair44@aol.com
Sent: Tuesday, July 15, 2025 11:11 AM
To: Planning Commission
Subject: Fw: OPPOSE DATA CENTER

[EXTERNAL EMAIL]

----- Forwarded Message -----

From: sbair44@aol.com <sbair44@aol.com>
To: PLANNINGCOMMISSION@FREDERICKCOUNTY.GOV <planningcommission@frederickcounty.gov>
Sent: Tuesday, July 15, 2025 at 11:05:16 AM EDT
Subject: OPPOSE DATA CENTER

I understand need for growth, however; we have lived at Windsor Estates for over 40 years as many of our neighbors. Has any study been done of the cancer impact of East Alco on the ground, air and water? Going down Dover Drive you know each house of current members and former members have been impacted with a cancer diagnosis as well as pets.

Now with the impact of noise and light. Do any workers at this data farms live near their place of work or do they avoid it?

thank you for listening, Sandra Bair

James, Karen

From: Christopher Wolcott <chris.wolcott@comcast.net>
Sent: Tuesday, July 15, 2025 8:49 PM
To: Council Members; Planning Commission; mkuykemdall@catellus.com
Subject: CDI-OZ Comments
Attachments: CDI-OZ.Comments.Wolcott.docx

[EXTERNAL EMAIL]

I was able to watch the public comments on Tuesday evening. I would like to provide a couple of comments/thoughts.

I have also included Michael Kuykendall from Catellus Development Corporation

Chris Wolcott

chris.wolcott@comcast.net

My name is Chris Wolcott. I live in the Green Hill Manor community at 5861 Goldenwood Place Adamstown. My wife, Carol and I, purchased our new house 25 years ago, July 2000, and have enjoyed every moment living in Frederick, MD. We have 2 boys that were born after we purchased the house and attended Carroll Manor Elementary (our oldest also attended Urbana Elementary because of the original magnet program), Ballenger Creek Middle School and Tuscarora High School. Both also have attended the University of Maryland College Park, the oldest has graduated and the youngest will be a senior this coming fall.

A little bit more about our involvement in the surrounding community. I was the Carroll Manor Recreation Council (CMRC) soccer commissioner for 2 ½ years when the community was young. We supported 350+ kids playing soccer each season and was on the board when Alcoa donated the land to CMRC (next to the elementary school). We have belonged to St Joseph's on Carrollton Manor catholic church for the 25 years. Over that time both my wife and I were part of several activities: Taught the baptismal class, fundraising for the new church (dedicated in 2014), Sunday greeters and delivering food from our food bank for SOME (So Others Might Eat).

On Thursday July 10 a group of Green Hill Manor residents meet with Michael Kuykendall and Sandra Kim from Catellus Development Corporation at a neighbor's home. The discussion lasted for 3 hours and was very informative. Many of us had several meetings with Quantum Loophole staff also prior to Catellus taking over the site management.

I was happy that Michael spent some time explaining the CDI-OZ map that had just been published earlier in the week. Prior to meeting with Catellus I had only seen the CDI-OZ map and had not read the following documents:

- Critical Digital Infrastructure Overlay Zone, An Amendment o fthe Livable Frederick Comprehensive Plan, Frederick County, Maryland, July 2025
- County Council Bill No 25-05
- Report of the Frederick County Data Centers Workgroup, March 1, 2024

I have several thoughts that I would like to express:

Original Alcoa property

- Based on the land being zoned General Industrial (GI) I was happy to hear the land was to be used for data centers and not some other heavy industrial use.
 - I remember being able to see the smelting tower fire from the second floor of our home while Green Hill Manor was still being developed.

- I remember the discussion for a waste transfer station on New Design and the railroad tracks.
 - The discussion of New Town (not sure how serious that was)
- Alcoa did a wonderful job with the agriculture buffer they had between the industrial site and the rest of the community.
- Also I would hope the Frederick County School system can figure out a way to work with data centers to support field trips, technical courses and other opportunities for the Frederick students.

Proposed CDI-OZ

I am glad to see that there is a plan being put forward so it can be discussed in public. Obviously, I understand county leaders can change in the future and any current plan can be altered/amended.

- I am happy to see that the CDI-OZ does not include the land bounded by the railroad tracks on the north, Adamstown Rd to the south, CMRC Park land on the west and New Design on the east. I am not sure exactly how many acres this area is. This provides a buffer for the Green Hill Manor community, individual houses along Adamstown Rd and Carroll Manor Elementary school.
 - Catellus added additional boundaries to the CDI-OZ maps to include areas not documented by the CDI-OZ, but owned by QL. My understanding is this area is zoned General Industrial (GI) and Limited Industrial (LI). So even though it is not part of the CDI-OZ it could still be developed as GI/LI.
 - I would encourage Catellus and the county to discuss turning any or all of the area mentioned above into a park or green area to continue a buffer between any industrial development and the Green Hill Manor community. If a park was agreed upon, I would hope it could be developed sooner than later or in various stages, maybe just walking trials and green area to begin with. Again, a promise is great, but action is better. I would hope this would show that Catellus and the county want to provide benefits to the entire Adamstown community.
 - As I said earlier, I was part of the CMRC board when Alcoa donated the land next to Carroll Manor Elementary school to CMRC. CMRC had high hopes to development the land. We had early architectural plans to build a football/soccer field with limited stands, enclosed basketball court, a baseball field and walking trails for the community. All of this took money that the recreation council did not have. I would hope that the current CMRC

board could work with Catellus and/or the county to determine how to turn over the land to the county for incorporation into a larger park. If Catellus and the county were to build a park in the above-mentioned area, could the land be turned over to the school system since it is next to Carroll Manor Elementary school.

- I am concerned with CDI-OZ located around the **St Joseph on Carrollton Manor Catholic Church.**
 - If the County Council or Catellus representatives have not walked the property, cemetery or visited the historic church please contact Fr. John Williamson and I am sure he would be happy to arrange a tour. Please visit <https://stjoesbuckystown.org/history-of-st-joseph-on-carrollton-manor/> to read a little bit about the history. The cemetery of the south and west side of the property adjoins the CDI-OZ. What will the buffer be between any buildings and the cemetery.
 - Stand on the steps of the historic church and look north, west and east what can be done to preserve as much of the area within view.
 - The Charles Carroll manor house is currently located in the middle of the Alcoa property. If it is kept at the current location, it will most likely not be open to the public. I will defer to the St Joseph pastor, but I would hope it could be moved to an area that the county could manage as a historic park and allow public visitors. The land across from St Joseph could be a potential site that would allow for a buffer north of the church and would tie in nicely with the history of St Joseph.
- Additional area added by the CDI-OZ
 - I am concerned about adding additional area before we can see what the true benefits are or negative impacts. The current Alcoa land I believe is enough for the data centers to get started. If Frederick County sees mainly positive benefits in the next three to five years, then add additional land.
 - I work at Frederick National Labs for Cancer Research on Ft Detrick. I am concerned with the potential generator noise. We have generators attached to each building because of labs with freezers and critical samples. I am around the generators regularly when they are used or tested. I will be interested to hear the first time all the generators are tested at the first Rowan site and hope the council will be there and around the communities to hear if there is any impact.

- Please wait to add any additional area until a couple of Rowan sites come online and you can determine to environment impact (noise, light, traffic, electric, water).

James, Karen

From: jx2h25@comcast.net
Sent: Tuesday, July 15, 2025 3:32 PM
To: Planning Commission
Subject: CDI Overlay Proposal

[EXTERNAL EMAIL]

To: Planning Commission Members:

The Overlay should include **all** properties that would qualify north of the Eastalco campus (which would not exceed the <1% cap). This would not only maximize the industrial tax base but allow potential future data centers to carry out long term planning accordingly. Expansion could occur without the necessity of starting from ground zero. If there is no demand for expansion, then the property's zoning would probably remain agricultural.

Sincerely,
Tom Horman
5649 Horman Lane
Frederick, MD 21703

James, Karen

From: Nick Carrera <mjcarrera@comcast.net>
Sent: Tuesday, July 15, 2025 2:43 PM
To: Council Members
Cc: County Executive; Planning Commission; Carrera, Alexandra; Carrera, Johnny; Carrera, Nicholas
Subject: Remarks on Overlay legislation

[EXTERNAL EMAIL]

I'm Nick Carrera, 2602 scenic Thurston Rd, Frederick

I'd planned to make brief remarks for tonight's Council meeting (7/15/25) on a "simple" way out of the prickly issue of abutment and setbacks. The more I thought, the less simple the issue appeared, and the less amenable to a three-minute argument. I hope you won't mind these extended remarks.

County Executive Fitzwater was wise in establishing, June 22, 2023, the Data Centers Workgroup (DCW). She chose members to represent a range of county interests, and gave them time to investigate and provide helpful advice to her on dealing with data centers.

Buddy Rizer, responsible for the explosive growth of data centers in Loudoun County, Virginia, spoke to the DCW on November 15, 2023, offering often-cautionary advice on controlling undesirable aspects he had seen in Loudoun. He said when they set out to attract data centers the county drew 19% of its revenue from commercial sources, and they hoped to increase it to 23%. They were now at 50%. They had planned for 5 to 6 million square feet in data centers, and now had 31 million square feet. He advised us to set limits: "Don't leave it to chance where they might go, set your boundaries."

The very first "Topline finding" in the DCW's March 1, 2024, Final Report to CE Fitzwater was for an Overall limit: The Frederick County Council should consider establishing an overall upper limit on data center development in Frederick County, as measured by metrics that may include total facility square footage, total land acreage, energy usage or another metric to be determined by policy makers. The DCW reviewed and recognizes the advantage such a limit would confer, reducing the effect of data centers on resources such as water and energy, and limiting the risk of Frederick County becoming overly financially reliant on a single industry. The DCW does not recommend a specific limit at this time."

During the following year no metrics to limit data centers, such as the DCW had proposed, were established. Quantum Loophole (QL) had purchased the former Eastalco site on June 29, 2021, for a "Master Planned Data Center Community" on its 2100 acres. Plans by two developers were approved for 15 data centers, and construction began. The county began crafting legislation to limit data center characteristics and types of property for their location, but concern grew that this could still allow considerable sprawl over much of the county. This concern was much relieved this past May.

On May 6, 2025, CE Fitzwater and the County Council announced agreement to limit data centers to the area around the former Eastalco property. It would include the original QL property and perhaps enough additional land to comprise as much as 1% of the total county area. In round figures, it could mean a

doubling of the QL's 2100 acres. Initial reaction was strongly positive, but as details have emerged in the ensuing draft legislation, concern has grown around several issues.

With the concern over sprawl apparently set to rest, the main concern seems to be whether the data center complex near Adamstown will be a "good neighbor." The draft bill seeks to meet that concern with provisions for setback from residential areas [para (B)(1)(c)], with calls to limit impact on nearby properties and activities [para (B)(2)(a,b,c,d,&e) and, in the second section, para (B)(3)], and with limits on Noise – levels, surveys, and complaint mechanism. In this way, the draft bill seeks to address the "good neighbor" concern, but as is apparent from citizen reactions, it does not solve it. Here are some ideas I hope you'll still consider.

The idea of an effective setback, suggested by Don Pleasants at the February 25, 2025, Council meeting, seeks to allow full practical use of available property while remaining a good neighbor. An arbitrary setback, though, without analysis, falls short. This might be an issue that a revived DCW could address. They could consult experts on noise and how different frequencies attenuate with distance. We know from our own experience with thunderstorms that a high-pitched crack is heard from lightning nearby, and it quickly attenuates, while the low-frequency portion becomes the thunder heard much farther away. As we've heard from N.Virginia residents, it's the low-frequency hum of data centers that can be most annoying, even disruptive of health and daily life. DCW members could visit N.Virginia neighborhoods and talk with residents to get a personal handle on how far an effective setback might be. A proper figure could then go into our legislation. It could also include the possibility for exceptions, and there are reasons for this.

The noise at the boundary can be affected by a number of factors within the applicant's control: building size and material; placement, baffling, and choices for AC and generator units; berms; types of vegetation; and possibly other factors. In specific cases where an exception might be possible, an ad hoc advisory group could be formed. It could include the applicant, affected residents, experts on noise, and perhaps a member or two from Council or Planning Commission. Ideally this could be a way to balance resident and applicant rights and concerns.

There are other issues that have come to light. Power and water were already looking problematic for just the QL site. The early QL prospectus said 1 GW of power was available, but the 15 data centers already approved appear to meet or exceed that figure, and an industry publication estimated that 2 GW would be needed for full QL build-out [Data Center Dynamics, 5/17/24]. If so, it seems too early to increase the Overlay beyond the present QL. Besides, there seem to have been no further sales at QL, beyond the two already, Aligned and Rowan-Bauxite.

Frederick County has been touted as an example of how counties can and should handle their data centers. If ours is to be an example for other counties in Maryland and other states, it should encourage us to "get it right." That may take some time, but applicants for new data centers are not knocking down our doors, and we can halt this rush to create an expanded Overlay that is not yet needed. The County Executive could declare an indefinite moratorium on new applications, while the county takes the time it needs. The Overlay, for now, could be defined as the present QL property, with option for later expansion, if demand warrants it.

Thank you for considering my comments.

James, Karen

From: Hope Green <hope.green76@yahoo.com>
Sent: Wednesday, July 16, 2025 9:49 AM
To: Planning Commission
Subject: CDI Overlay

[EXTERNAL EMAIL]

I hope you watched the CC meeting last night. I'm making another plea to not go forward with this overlay. The problems that have occurred since your approval of the QL site in November of '22 should be enough to deny going any further than the old Eastalco site. Have you forgotten that fact that less than 6 months into the project MDE shutdown QL for almost a year for environmental violations that imposed fines have yet to be paid. And yes, that was QL and they are gone, but they are still part of TPG. Violations are continuing, but the Govenor has tied the hands of MDE to a great degree.

More well contamination is surfacing in the Adamstown Village community. The signs are up for the public meeting in August for approval of the 35-acre substation on Lot 304. Most people don't know about that yet, sign placement is fairly obscured. That in and of itself will be an issue to local residents.

You must take a step back, consider the damage to the environment, the fact that there's not enough water or power for the current site, let alone adding more to it. It's our health, well-being and livelihoods and our environment that should be your focus.

I feel this is as political as it was in Nov. '22. You approved the QL site one condition, a staff change at QL. I did some digging and learned it was naming Natelli to QL's board. This overlay is nothing short of rewarding developers with lucrative zoning, sentencing our treasured landscape to demise to satisfy a misinformed Govenor. It will drive up land prices even more, making it unaffordable for young families and want to be farmers to live their dream.

I currently have that situation. A family desperately wants to buy my farm. I would love for them to have it, but I need enough money to move on, and they can't quite afford it because real estate and land assessments/prices, especially, have escalated. Our Ag Pres programs are outdated, unequitable and unfair.

Please deny this overlay. The current site is more than enough, is wrought with problems and will most likely not end well.

Respectfully,

Hope Green
5515A Mountville Rd
5515B Mountville Rd
5252 Mountville Rd
Adamstown, MD 21710

James, Karen

From: Gaines, Kimberly
Sent: Thursday, July 17, 2025 8:27 AM
To: James, Karen
Subject: FW: Stup Farm Overlay

Categories: Green category

From: Bill Stup <wstup@aol.com>
Sent: Wednesday, July 16, 2025 1:41 PM
To: Davis, Timothy <TDavis@FrederickCountyMD.gov>; Long, Michael <MLong@FrederickCountyMD.gov>; Nicklas, Barbara <BNicklas@FrederickCountyMD.gov>; Tressler, Samuel <STressler@FrederickCountyMD.gov>; jrensberger@frederickcountymd.gov; Hicks, Craig <CHicks@FrederickCountyMD.gov>
Cc: Gaines, Kimberly <KGaines@FrederickCountyMD.gov>
Subject: Stup Farm Overlay

[EXTERNAL EMAIL]

Dear Commissioners,

My name is Bill Stup, the oldest son of Howard and Texanna Stup, of Howard Stup Road. I'm writing on behalf of our family regarding the proposed overlay.

During recent testimony, I heard Marieta Stup mention that she is not part of the Stup family requesting inclusion in the overlay. That is correct—she owns a farm at a separate location and is not connected to our request. I want to clarify that my immediate family is united in our support for this endeavor.

We attended last night's meeting and also watched today's session on Frederick Live. While we've come to this process somewhat late, we're committed to understanding it fully and participating constructively.

Thank you for your service and attention to this matter.

Sincerely,
Bill Stup

James, Karen

From: Tony Checchia <tonyc@veritarealestate.com>
Sent: Wednesday, July 16, 2025 1:25 PM
To: Planning Commission
Subject: Checchia Data for Testimony, 7/16/25

[EXTERNAL EMAIL]

Thank you all in advance for considering this data as part of your deliberation.

The headline is the County should take every opportunity possible to capitalize on the economic impact that this project will create.

And, any farm land that is zoned AG that is sold will trigger the AG Transfer Tax, which goes directly into the AG preservation bucket controlled by the County. The Noffsinger Farm sale generated over 300k alone.

Other notes: St Josephs property should be an institutional overlay.

Matan's warehouses are zoned MXD.

Planning for Industrial growth along with the IW2, 2-4% total county-wide will preserve and protect the AG/RC/Sugarloaf Areas, that total nearly 75%.

Let's look at some data points regarding land use in Frederick County:

- Total land area: 424,283 acres
- Ag Zoned: 238,659 acres (56%), with over 78,000 acres under easement and a preservation goal of 160,000 acres.
- RC/Mountains/Sugarloaf Conservation Area: 70,000 acres (15%).
- Overall, Ag and RC zones account for 75% of the land.
- **Industrial (LI/GI/ORI) zones are only 4,200 acres (1%).**

Currently, 78% of our real estate tax revenue comes from residential properties versus 22% from commercial/industrial, while IW2 goals aim for a 70% residential / 30% commercial-industrial tax base.

Comparing property tax revenues:

- Current ORI/LI/GI average: \$20,000/acre.
- Two MF projects (Urban Green, Linganore Town Center) yield \$63,000-\$78,000/acre.
- Top employers (AstraZeneca, Kite Pharma) generate \$75,000-\$90,000/acre.
- Recent Industrial Warehouse Projects (Jefferson Tech Park, New Design/English Muffin) bring in \$16,000-\$19,000/acre.
- Large Retail Centers (FSK Mall, Westview Promenade) yield \$13,000-\$17,000/acre.

- Existing Data Centers in Urbana (Fannie Mae, United States of America) generate \$10,000-\$43,900/acre.

Currently, GI lands within the CDI area under development or zoned GI already generate over \$1.2m/yr in re taxes or \$1,300 per acre in real estate taxes, compared to \$41,000/yr or \$33 per acre for the 1200 acres of farmland in the proposed CDI area.

Noteworthy sales and their economic impact highlight significant value from commercial land:

- Eastalco Sale (2021): \$100,000,000 or \$50,000/acre.
- Allied (2022): \$37,500,000 or \$500,000/acre.
- Recent Rowan sales (2024-2025): \$158,000,000 to \$180,765,875, or \$1 million to \$1.25 million per acre.

These sales also generated substantial recordation taxes (\$6.6 million, with \$2 earmarked for Ag Preservation/Affordable Housing) and Ag Transfer Tax (\$350,000 from the Noffsinger Property, directly to Ag preservation coffers).

For the sake of Our Community, Our Health, Our Economy, and Our Environment, please consider the fact that time kills deals, time kills opportunity and for the County's sake, we need to be smart and leverage the opportunity to capitalize on the revenue this project will generate for our schools, infrastructure and non-profits.

The alternative is higher taxes, more congestion and a continuation of the want for schools/recreational facilities without any economic means to get there.

Thank you for your attention.

James, Karen

From: Joseph R Horman <huntrig@msn.com>
Sent: Wednesday, July 16, 2025 2:42 PM
To: Planning Commission
Subject: Data Center Overlay Map

[EXTERNAL EMAIL]

Hi. Please consider utilizing the entire corridor between Ballenger Creek Pike and New Design Road up to Harshman Way/ Elmer Derr Road. There are only 2 ag properties left above the Pleasants properties, to the north that are not in preservation programs such as Ag Preservation. There is no reason to leave those properties in limbo and or to be subject to residential property in the future. The impact of the zone change versus residential properties is obviously large as data centers could offer green space etc. vs roads and overcrowding.

I grew up in Frederick County, graduated the same high school, Frederick High, as my parents and watched Frederick march from Route 70 south to Elmer Derr Road as well as march north from the Adamstown area. Those in opposition are mainly the "Not in my backyard" transplants that live in these developments that were once farmland when I grew up. Progress has to happen and lives and families will and can be generationally changed from these decisions.

Please consider this corridor, between Ballenger Creek Pike and New Design Road north Manor Woods Road as part of the overlay.

I appreciate your time and consideration.

Joe Horman
4780 Cap Stine Road
Frederick, MD 21703
240 674-7476

James, Karen

From: Nick Carrera <mjcarrera@comcast.net>
Sent: Wednesday, July 16, 2025 5:52 PM
To: Planning Commission
Cc: Carrera, Johnny; Carrera, Nicholas
Subject: Recap of Overlay figures from my comments today

[EXTERNAL EMAIL]

Dear Planning Commissioners,

I hope you don't mind my sending a recap/extension of my remarks at today's meeting. I attended seeking information, not intending to speak, so my remarks were prepared "on the fly" from data I had with me from SDAT and county maps. I did the sums by hand, in the few minutes after I decided to speak, and rounded to the nearest acre, so some sums may be off by 2 or 3 acres, I hope not more.

QL bought 2122 acres in 6/29/21 for \$100 M (that's probably data from the FNP).

They divided the land into lots. From the 12/03/2021 Quantum Frederick LOU Water Phases map done by Rodgers, I tabulated the lots and their areas. I've not had any check from Quantum or staff, but I think my figures are close.

QL platted salable lots: total area: 956 acres

QL sold lots 106, 107, 108, and 109 to Aligned; total area 75 acres

QL sold lots 104, 105, 302, 303, 400, and 401 to Rowan-Bauxite; total area 301 acres

Total sold to date, Aligned and Rowan -- 376 acres

That means remaining lots at QL total -- 580 acres.

There is plenty of land at QL left to sell.

A question someone raised: why, then, go for an enlarged Overlay? Here's my opinion: it was partly a political move to address serious citizen concern about data center sprawl. The May 6 compromise specified the Eastalco area, where QL already had data center approval and construction was underway. It was the only choice, if you wanted to confine data centers to one area.

Then why enlarge the Overlay, and with what properties?

These are the properties that staff proposes be added:

Don Pleasants -- 399 acres

Tom Natelli (termed "Noffsinger," the former owner) -- 64 acres

Windridge Farm -- 222 acres

This adds up to a 685 acre increase

We heard today that these also want to be added to the Overlay:

Horman -- 222 acres

Geisinger -- 211 acres

Stup ----- 137 acres

Total of these "wanna be's" -- 570 acres

To recap:

QL bought 2122 acres, but not all is salable. They put up 956 acres for sale, and sold 376, leaving 580 acres still for sale.

Under the CE/CC compromise there will be an Overlay. What might the size be?

If it is only the QL property, it will be 2122 acres

if it adds the proposed lots that will make three people happy, it will add 685 acres, for a total Overlay of 2807 acres

if it adds, besides that, the lots that will make three more people happy, it will add 570 acres, for a total of 3377 acres.

Since there is currently no high demand for data centers here, *why add more land now to the basic QL property?*

In crime novels, you'll sometimes see the detective asking the question, "*Cui bono?* -- Who benefits?"

Nick Carrera, 2602 scenic Thurston Rd

James, Karen

From: Nick Carrera <mjcarrera@comcast.net>
Sent: Thursday, July 17, 2025 8:57 AM
To: Planning Commission
Cc: Council Members; County Executive; Carrera, Johnny; Carrera, Nicholas
Subject: To get a handle on power and water needs

[EXTERNAL EMAIL]

I'm Nick Carrera, 2602 scenic Thurston Rd

An idea hit me over morning coffee: We talk a lot about power and water needs, but we often differ on the data. When some of us throw out numbers we believe to be accurate but can't claim to be "official," I have the sense that we are disbelieved and our concerns not taken seriously. Why can't we all operate from the same, reliable data?

How much power will be needed by the 15 data centers of Aligned and Rowan-Bauxite? same question for water. Since those DC's have approval and are under construction, those figures should be accurately known.

Yesterday Michael Kuykendall, the on-site VP of Catellus, and Tom Natelli, a Member of the Board of Directors of Quantum Frederick, were both present and offered remarks at your meeting (July 16, 2025). They should want to be helpful. Why not ask them to provide, for the 15 data centers, accurate data on their power and water needs? Reasoned discussion would be more productive if we were all working from the same, accurate data base.

Thanks for considering this suggestion.

James, Karen

From: Elizabeth Law <bettybob1758@gmail.com>
Sent: Thursday, July 17, 2025 9:01 AM
To: Nick Carrera
Cc: Planning Commission; Council Members; County Executive; Carrera, Johnny
Subject: Re: To get a handle on power and water needs

[EXTERNAL EMAIL]

Nick,
You are absolutely correct. We all need to have the facts in order to have a reasoned discussion and to make realistic determinations.

If Michael K and Tom Natelli don't have the numbers for megawatt and gallons of water/day required for the data centers, who would?

Betty

On Thu, Jul 17, 2025 at 8:56 AM Nick Carrera <mjcarrera@comcast.net> wrote:
I'm Nick Carrera, 2602 scenic Thurston Rd

An idea hit me over morning coffee: We talk a lot about power and water needs, but we often differ on the data. When some of us throw out numbers we believe to be accurate but can't claim to be "official," I have the sense that we are disbelieved and our concerns not taken seriously. Why can't we all operate from the same, reliable data?

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Thanks for considering this suggestion.

James, Karen

From: Mark Sankey <markrsankey@gmail.com>
Sent: Thursday, July 17, 2025 8:19 PM
To: Planning Commission
Subject: CDI and Overly - Comments on July 16 Meeting
Attachments: Overlay and Finish-Planning Commission.docx

[EXTERNAL EMAIL]

Planning Commissioners:

Thank you for your efforts and service to the community.

I have some additional comments following yesterday's meeting.

Mark Sankey
Frederick, MD

CDI Policy and the Overlay

I attended the July 16, 2025 Planning Commission meeting. I appreciate the work you do in conjunction with the Planning Department. Steve Black has publicly made some strong points regarding Livable Frederick commitments for analysis before amending the Comprehensive Plan for a particular area. I understand. Reality hits us that we cannot get it perfect. Failure to act regarding data centers now leaves the County vulnerable for more permit applications without legal basis to resist.

You all follow the concept of the overlay zone and that it aligns well the County's desire to limit the proliferation of AI. Let's understand that AI's main impact is speeding data analysis. It's use to foster intelligence is foolish. AI can be a useful tool but speed and efficiency ought not be priorities. Data centers bring revenue but other industries would bring greater long term economic benefit.

Limiting the extent of data centers limits its impact on the environment. That is significant in what we can do as a County to address concerns of water and power supply issues. I have looked at the maps and the parcels identified for changes to Designated Land Use. The proposed overlay zone is significantly less than the roughly 4420 acre County-wide cap. Many of us would like to see it limited to the areas already permitted for data center construction. While I had seen that as unrealistic, some compromise is possible. At the meeting, the members reviewed the individual properties included in the overlay. As reported in the FNP, local residents have appealed for the overlay to shrink back to the Eastalco area. It was reported that the area Catellus owns is not yet fully permitted for constructing data centers.

The Planning Commission now has the responsibility to modify or accept the overlay as it is. My perspective is that the overlay does not need to extend as far as proposed. The potential for Adamstown and other residential areas to bear with more data center construction is real if Land Use Designation is changed to industrial. The land along New Design Road is currently choice farmland. That and other properties in the northern part of the overlay could be excluded. Specifically, I think areas 3, 4, 5, and 6 could be considered for exclusion. Area 4 is directly across from a residential development. Areas 5 and 6 simply add more potential for data centers. Recognizing the desire for owners to increase property value is understood but cost to the local community should be considered. What is of greater value for land use, agriculture or data centers? Changing Land Use Designation for all the properties considered is not needed now. If that door is not opened now, we further limit the construction of data centers in the County.

James, Karen

From: Jason Ruhe <jason.ruhe@gmail.com>
Sent: Friday, July 18, 2025 6:00 AM
To: Planning Commission
Subject: Data Centers and CDI

[EXTERNAL EMAIL]

Hello,

I am learning about the proposed expansion of the CDI in Adamstown and I am contacting you to express my concern. While I understand that growth is necessary to meet the demands of our evolving digital needs, allowing the CDI to expand into Rural Legacy and Priority Preservation zones is not acceptable. It sets a dangerous precedent for the future and will forever change the landscape in Adamstown.

Considering the infrastructure issues Frederick county already has with power, and the toll this would take on ground water, expanding the zone is a mistake.

You have the opportunity to make the right decision and protect the future of our County. Please make the right choice and limit the CDI zone to its existing area.

James, Karen

From: Deborah Boots <debboots5@gmail.com>
Sent: Friday, July 18, 2025 6:58 AM
To: Planning Commission; Debby Boots
Subject: Proposed data center overlay

[EXTERNAL EMAIL]

I oppose data centers, period. But especially this one in rural Maryland with big ideas of expansive service to technology needs. The installation simply promotes growth with economic boosting which will never help the human agenda. What's your vision for Frederick, anyway? More people to consume more goods with support of chips and wires? When are humans going to consider the damage we are inflicting on earth's resources and other species who share our space? That concept doesn't seem to enter the dialogue. Too bad. Please go slow on this proposal and think how our landscape and life purpose will be affected in, say, 50 years? Like plastic and pesticides, things get out of hand quickly when people can't think beyond their urgent needs for convenient services. Debby Boots, 5955 Quinn Orchard Road, #207, Frederick. 204-566-5701.

James, Karen

From: Lisa Gaver <gavertreefarm@aol.com>
Sent: Friday, July 18, 2025 10:49 AM
To: Planning Commission
Subject: CDI overlay map review

[EXTERNAL EMAIL]

Planning Commission of FC,

I understand your board is in the process of reviewing the CDI overlay map. I believe the overlay bill for the CDI is an important or at least a better way of limiting and controlling where Data Centers may be considered.

At the current time, we believe it wouldn't be wise or good planning to expand the current alcoa growth area. We also would really hate to see the Rural Legacy areas or the Priority Preservation area boundaries be adjusted just to allow for the growth of data centers. That concept would set the pace to change those areas on any whim just to allow up zoning. It is also extremely important to now set up and add an Adequate Public Facilities Ordinance style review for water and power before any new zoning could occur. Right now they can just get zoning and then not only demand the power industry provide them power, but also can make the rate payers pay for it and then destroy agriculture lands that are precious to Maryland.

It is important to the communities and citizens to have a responsible plan for power and water in place before more zoning is added.

Thanks for your review of our comments.

Lisa and Mike Gaver
Gaver Farm
New Market, MD 21774
301-305-2800

James, Karen

From: Matt Ahalt <mattahalt@gmail.com>
Sent: Friday, July 18, 2025 3:50 PM
To: Planning Commission
Subject: CDI overlay

[EXTERNAL EMAIL]

Dear Planning Commission:

I am writing to you as a concerned citizen of Frederick County regarding the CDI overlay that your group is reviewing at your upcoming meeting on July 23rd.

I request that you do not expand the current CDI overlay zone out of the existing growth area. I also request that you do not re-draw the Rural Legacy Area and the Priority Preservation Area to allow the expansion of the existing growth area/CDI overlay zone.

The county has marked the areas adjacent to the existing growth area as priority preservation and Rural legacy areas, and the goal was for those areas to remain in agriculture.

The areas outside of the existing growth area had been identified by both the county and state as where the best soils exist and where would be the most effective in having large contiguous tracts of land needed to be kept in agriculture to support a strong ag community and ag industry. Agriculture in Frederick County is a prominent industry. You cannot eat data, but you are able to eat 3 meals a day every day because of farmers. Any expansion of the growth area will have to be removed from the preservation areas and have a detrimental effect on people of Frederick County.

There are almost 2,000 acres within the existing growth area that can be developed for data centers. There is no need to expand further right now especially when it impacts the ag industry and the rural communities. The third map is the proposed overlay.

The data centers being constructed at the former East Alcoa site are not finished being constructed and we do not know how much of our limited resources, power and water they will consume.

FirstEnergy/Potomac Edison told the data center workgroup that the infrastructure (transmission lines) are not in place to handle the 1,500 acres currently zoned industrial if data centers are built there. AND we are in an energy crisis as it is which is why our electric bills are increasing dramatically. The first 3 properties with this industrial area have already used the county allocated potable water supply of 1.2 million gallons per day. There are major concerns regarding power and water with just the industrial zoned area within the existing growth area. This should have the county restricting data centers even more than this, but certainly not expanding where they can be built. The idea to expand the growth area for data centers is too premature. Please slow down.

Thank you for your consideration.

Respectfully,
Matt Ahalt

Sent from my iPhone

James, Karen

From: Kristin Ricketts <kadrickets@gmail.com>
Sent: Friday, July 18, 2025 4:17 PM
To: Planning Commission
Subject: CDI

[EXTERNAL EMAIL]

Good afternoon,

My name is Kristin Ricketts. I live at 1242 New Design Road in Adamstown. I am writing today in hopes that you all would seriously consider not expanding out of the existing growth area. Also do not redraw the Rural Legacy area or the Priority Preservation area. This would be setting other precedents for our protected land. If you can just take it out of protection then what's the point of putting land in protection? We do not know how these data centers will run in our area. I think we should keep the growth area as it is until we see how data centers will treat our area. They take up a lot of resources like electricity and water. I feel like talking about expanding before we know anything is very premature. We can look around to neighboring states and see what has happened. Do we want to do the same thing to our beautiful land? Not to mention that that land is some of the most fertile land in Frederick County. We don't need to be in such a hurry. We should be patient and see what will happen. We have about 2000 acres to see before we should be worrying about more land. Let's not put the cart before the horse.

Thank you for your time.

Kristin Ricketts

"So let's not get tired of doing what is good. At just the right time we will reap a harvest of blessing if we don't give up."
Galatians 6:9

James, Karen

From: silverho@aol.com
Sent: Friday, July 18, 2025 4:24 PM
To: Planning Commission
Subject: Data Center

[EXTERNAL EMAIL]

Good afternoon I am a resident of Adamstown and while I did not object to the initial building of said data center I am now very concerned about the over reach of farm property they want to extend to. I have seen the mess of Centers in Virginia and do not want that to happen to our town, county. I am also worried about our water table in our area. Please do not let them get out of hand. We vote for you and it will show in the next elections.

Regards, Hope Hamilton
1212 Buckeyestown Pike
Adamstown.

James, Karen

From: Jamie Smith <jlsmith0709@gmail.com>
Sent: Friday, July 18, 2025 4:39 PM
To: Planning Commission
Subject: Data Centers

[EXTERNAL EMAIL]

Dear Members of the Planning Commission,

I'm writing to ask that the proposed Critical Digital Infrastructure (CDI) overlay zone not be expanded beyond the current growth area in Adamstown.

There is no need to extend it. The current growth area already includes almost 2,000 acres that can support data center development. Expanding the zone would remove land from the Rural Legacy and Priority Preservation Areas — land that has been carefully protected for farming and open space.

Data centers are not a good fit for rural communities. They use massive amounts of water and electricity, and we're already seeing limits with our power grid and water supply. Potomac Edison has said the infrastructure can't support even the industrial land already zoned. The first three sites have already used up the county's 1.2 million gallon-per-day water allocation.

Plus, the proposed expansion brings data centers dangerously close to residential neighborhoods, which will affect the quality of life for those families.

At a previous council meeting, an Adamstown resident said it best: "Don't Virginia my Maryland!" Northern Virginia's experience with unchecked data center growth should be a warning. There, we've seen rural land lost, communities disrupted, and massive strain on power and water infrastructure. We should learn from that, not repeat it here.

Please protect our farmland, our natural resources, and our rural communities by limiting the data center build to its existing site.

Thank you for considering this request.

Sincerely,
Jamie Smith
Adamstown Rd.
Adamstown MD

James, Karen

From: Brian R. <brianaricketts@gmail.com>
Sent: Friday, July 18, 2025 5:30 PM
To: Planning Commission
Subject: Data center overlay

[EXTERNAL EMAIL]

To whom it may concern:

I am emailing about the data center overlay. I have been an Adamstown resident for 23+ years. My wife and I bought a farm on New Design Rd in Adamstown and we knew that it was going to be our forever home. We did our research at the time to see what the 20 year plan looked like, and we didn't see any growth to be concerned about. Things change and it's past the 20 year mark. We are not pleased with the choice to build data centers on the Eastalcoa land, but it's happening. Yes, I am saying that I do like it in my backyard, but it's moving forward.

A couple issues that I see are that they are planning to expand the project larger than already planned. So it will be double of it's original plan and that is not acceptable. We talk about what is good for the future of Frederick and how development of any kind can help the community. This is only a money grab and doesn't help the community at all, maybe a few jobs per building. These data centers help people all over the country and more, but not directly Frederick, it will actually hurt the community by the millions of gallons of water it will consume and the electricity that Frederick cannot handle. Does anyone even know the full amount of water consumption and electricity that it will need compared to what we have available??

So more power lines will have to be run through properties, bringing down value and in some cases land taken from residents to run the lines. Again, this plan is not for the Frederick community. So why is Frederick considering an expansion of the Data centers without all of the information needed to make such a decision? It will already be the largest data center complex in the US.

I am also concerned about how land in preservation can be changed for enough money for the county and state. Isn't the whole reason that land is put in preservation is to protect it from development? So are we saying that land preservation means nothing anymore as long as money is involved. The farm land in that area has rich soil, some of the best in MD, it would be a shame to then take over those farms around the original 2100 acres just to build buildings and parking lots.

Again, these centers are not for the greater good of Frederick nor MD residents, so why the push to expand it? I hope you consider how this will affect residents and the consumption of resources.

*Thank you,
Brian Ricketts*

James, Karen

From: Alyssa H <alyssa.1224@yahoo.com>
Sent: Friday, July 18, 2025 5:45 PM
To: Planning Commission
Subject: CDI area concern

[EXTERNAL EMAIL]

I am a resident of Point of Rocks, MD and am NOT for an expanded CDI area. This is very important because we will lose our beautiful, rural area if an expanded CDI map gets passed. The Adamstown area will pay for the whole county. There is not an issue with creating a CDI overlay zone for data centers but, do not expand the CDI overlay zone out of the EXISTING growth area. Do not redraw the Rural Legacy Area or the Priority Preservation Area to allow the expansion of the existing growth area/CDI overlay zone.

Thank you,
Alyssa Hanus

James, Karen

From: Cheryl-Lynne Stunkel <drybranchhollow@yahoo.com>
Sent: Friday, July 18, 2025 7:36 PM
To: Planning Commission
Subject: Data centers in Frederick county

[EXTERNAL EMAIL]

Although I would rather see a data center than hundreds of homes and disrespectful people out here, I do not think it is right to take land out of any Rural Legacy or any kind of land preservation. I believe things should be done honestly. I feel that if a landowner is told their property will always be in a preservation of any kind then it should stay that way. 2000 acres is far big enough for a data center for this area.

Please make the right decision for Frederick County and its land that is left.

Thank you!
Cheryl Stunkel
240-367-7533

James, Karen

From: Cathy Brown <brownathythatsme@gmail.com>
Sent: Friday, July 18, 2025 7:39 PM
To: Planning Commission
Subject: CDI OVERLAY

[EXTERNAL EMAIL]

PLANNING COMMISSION,

The CDI area should NOT be expanded beyond the existing EastAlcoa land.

1) water resource concerns: The quality of drinking water from the wells that service our homes are already impacted. The amount of water data centers need is beyond our current resources. The detail and process to use untreated municipal water is not yet developed to provide this resource. Ballenger Creek supports river otters down stream; they are impacted already.

2) storm water run off: Let's learn from the mistakes made in other communities and the disasters they faced due to run off from large buildings and the increased accessory parking and roadways. Our new normal for rain fall is drenching, fast and furious. The runoff already floods the low areas in the community.

3) Maryland's goal for environmental sustainability: Allowing even more old technology diesel backup generators that run weekly for testing creates local pollution and significant noise impacts over great distances.

4) existing preservation agreements on farmland: This resource can NEVER be recovered. That's why our County and State preserves it. It is a violation of the expectations these farmers had when entering these contracts!

5) available electric power: From what I have read, the residential customer will pay increased fees for new power lines that will feed these private companies. Everyone is stretching to continue to afford our high standards of living in Frederick County. The unfathomable increases in our electric bills in 2025 will only increase exponentially to support new electric infrastructure needed by these data centers.

6) current development with actual leases: Not all of the sites currently approved are under contract with leases. Development rights lead to holding undeveloped land until the profit margin motivates the developer. Land is lost to preservation, tax revenue delayed or lost, unsightly stages of development are stalled. Adamstown becomes the armpit of the State!

7) First people's heritage: I believe that Indian sites are located off Manor Woods Road between Ballenger and Buckeyestown. The History of Carrollton Manor by William Jarboe Grove c 1928 mentions these locations.

Regards,
Catherine Brown

James, Karen

From: Shellie Reed <shellie.reed4@gmail.com>
Sent: Friday, July 18, 2025 7:50 PM
To: Planning Commission

[EXTERNAL EMAIL]

Dear Planning Commission:

I am writing to you as a concerned citizen of Frederick County regarding the CDI overlay that your group is reviewing at your upcoming meeting on July 23rd.

I request that you do not expand the current CDI overlay zone out of the existing growth area. I also request that you do not re-draw the Rural Legacy Area and the Priority Preservation Area to allow the expansion of the existing growth area/ CDI overlay zone.

The county has marked the areas adjacent to the existing growth area as priority preservation and Rural legacy areas, and the goal was for those areas to remain in agriculture.

The areas outside of the existing growth area had been identified by both the county and state as where the best soils exist and where would be the most effective in having large contiguous tracts of land needed to be kept in agriculture to support a strong ag community and ag industry. Agriculture in Frederick County is a prominent industry. You cannot eat data, but you are able to eat 3 meals a day every day because of farmers. Any expansion of the growth area will have to be removed from the preservation areas and have a detrimental effect on people of Frederick County.

There are almost 2,000 acres within the existing growth area that can be developed for data centers. There is no need to expand further right now especially when it impacts the ag industry and the rural communities. The third map is the proposed overlay.

The data centers being constructed at the former East Alcoa site are not finished being constructed and we do not know how much of our limited resources, power and water they will consume.

FirstEnergy/Potomac Edison told the data center workgroup that the infrastructure (transmission lines) are not in place to handle the 1,500 acres currently zoned industrial if data centers are built there. AND we are in an energy crisis as it is which is why our electric bills are increasing dramatically. The first 3 properties with this industrial area have already used the county allocated potable water supply of 1.2 million gallons per day. There are major concerns regarding power and water with just the industrial zoned area within the existing growth area. This should have the county restricting data centers even more than this, but certainly not expanding where they can be built. The idea to expand the growth area for data centers is too premature. Please slow down.

Thank you for your consideration.

Respectfully,
Shellie Reed
7739 Emerson Burrier Road
Mt. Airy, MD 21771

James, Karen

From: Sharon Garlena <sharong0722@gmail.com>
Sent: Friday, July 18, 2025 8:13 PM
To: Planning Commission
Subject: NO DATA CENTER(S)

[EXTERNAL EMAIL]

A data center in Frederick County, Maryland raises several concerns:

- 1. High Energy Consumption:** Data centers consume massive amounts of electricity, which can strain the local power grid and increase reliance on fossil fuels if not sourced from renewables—undermining Maryland's climate goals.
- 2. Water Usage:** Many data centers use large quantities of water for cooling. This could threaten local water supplies, especially during droughts or in areas already facing water stress.
- 3. Noise and Light Pollution:** Constant operation of generators, HVAC systems, and backup systems generates significant noise and light pollution, potentially affecting nearby residential areas and wildlife.
- 4. Environmental Impact:** Clearing land for large data center campuses may lead to habitat destruction, loss of green space, and increased runoff, impacting local ecosystems and waterways like the Monocacy River.
- 5. Low Job Creation:** Despite their scale, data centers create relatively few permanent jobs, limiting economic benefits to the community compared to the environmental and infrastructural costs.
- 6. Land Use and Zoning Conflicts:** Large data centers can conflict with Frederick County's rural character, agricultural economy, and long-term planning efforts focused on sustainable growth and preservation.

In summary, while data centers "may" offer economic development potential, their environmental footprint and limited community benefits make them a questionable fit for Frederick County's long-term interests.

Thank you in advance for doing the right thing for your constituents and just say NO! I fought against the incinerator and will fight against this as well.

V/r,

Sharon Garlena

James, Karen

From: Brett Spencer <bspence549@gmail.com>
Sent: Friday, July 18, 2025 10:15 PM
To: Planning Commission
Subject: Frederick County Critical Digital Infrastructure Map

[EXTERNAL EMAIL]

Dear Planning Commission,

I am writing with regard to proposed edits to the Critical Digital Infrastructure (CDI) map. I encourage you to 1. Not expand the existing CDI overlay zone outside of its current mapped area, and 2. Not redraw the Rural Legacy or Priority Preservation Areas.

These are valuable, fertile lands that support the community's agriculture and local businesses and it would not only be ecologically harmful but unsightly to install data centers across these lands. I play tag with my nieces on residential property adjacent to these priority preservation areas and have personally photographed mated great horned owl pairs roosting in the trees.

Please do not expand the existing CDI overlay zone outside of its current mapped area, and do not redraw the Rural Legacy or Priority Preservation Areas.

Sincerely,

Brett Spencer

Sent from my iPhone

James, Karen

From: Madelyn Bull <bullmaddy1@gmail.com>
Sent: Friday, July 18, 2025 10:36 PM
To: Planning Commission
Subject: Considerations for Expansion

[EXTERNAL EMAIL]

Hi,

My name is Maddy Bull. I live at 1242 New Design Road in Adamstown. I am writing today in hopes that you would take into consideration the immense damage the dysregulation of data centers are causing to the community and Frederick county residents and cease to expand out of the existing growth area. Redrawing the Rural Legacy area or the Priority Preservation area is another concern I have, as this would be setting other precedents for our protected land in Frederick. The data centers take up a lot of important natural resources like electricity and water that are required for agriculture and people in the surrounding areas. This land is some of the most fertile land in Frederick County, making this matter even more pressing. Please consider putting the good of the community ahead of the profits of this expansion and redrafting.

Maddy Bull

James, Karen

From: Kristen Bicknell <kristenbicknell1@gmail.com>
Sent: Friday, July 18, 2025 10:52 PM
To: Planning Commission
Subject: Frederick County Critical Digital Infrastructure Map

[EXTERNAL EMAIL]

Dear Planning Commission,

I am writing to express my strong opposition to the proposed expansion of the CDI area. This expansion threatens to destroy valuable agricultural land and disrupt a delicate ecosystem that sustains a diversity of life - from wild turkeys and great horned owls to coyotes and frogs.

Beyond the environmental harm, CDIs pose serious risks to nearby residents. These facilities consume massive amounts of energy, often relying on diesel generators that release toxic particulates into the air. Placing such infrastructure near homes endangers public health and could have irreversible long-term impacts on the community.

Data centers demand extraordinary volumes of water. Frederick County has been experiencing drought conditions since November 2024, and at a time when water resources are already strained, it would be irresponsible to allow additional water-intensive development.

I urge you to protect the farmlands, the wildlife, and community well-being. Do not expand the existing CDI overlay zone outside of its current mapped area, and do not redraw the Rural Legacy or Priority Preservation Areas. Once these lands are lost, they are lost forever.

Thank you for considering the long-term health of Frederick county.

Sincerely,

Kristen Bicknell

James, Karen

From: brianna howard <briannahoward48@gmail.com>
Sent: Friday, July 18, 2025 11:22 PM
To: Planning Commission
Subject: Our once beautiful Adamstown

[EXTERNAL EMAIL]

To Whom this may concern,

I have lived in Adamstown my entire life, my mother, grandparents, great grandparents etc. all grew up in the beautiful rural Adamstown. The data centers are ruining what we all love about this small town. I don't think there is one person who lives here that is happy about this change. I know we can't stop it now, but we can stop the rezoning of more agricultural land, and for what? Money? Please I am begging you for the sake of us Adamstown locals please don't let quantum loophole take more of our beautiful town.

I'm going to attach a picture of a house that has been passed down from generations in Adamstown.

Sincerely a very sad local.



Sent from my iPhone

From: DIANE & BRUD BICKNELL <bicknell0104@comcast.net>
Sent: Saturday, July 19, 2025 7:49 AM
To: Planning Commission
Subject: CDI Limitation for the Health of Our County - Learn from Small Town Virginia Part 1

[EXTERNAL EMAIL]

<https://www.sierraclub.org/sierra/2024-3-fall/feature/big-data-centers-heres-what-happens-when-takes-over-small-town>

Here's What Happens When Big Data Takes Over a Small Town

In Virginia, the planet's largest proposed data center threatens local ecosystems

By [Ashley Stimpson](#)

Illustrations by [Glenn Harvey](#)

September 12, 2024

The pastoral landscape surrounding Manassas, Virginia, has been eyed by developers for decades—plans have been drawn up and then dashed for a shopping center, an interstate, even a Disney theme park. Despite these pressures, much of the region has retained its rural character. Butterflies visit clumps of wildflowers. Turkeys and deer stamp out muddy trails. Foxes dart in between clearings as they traverse the region's forests.

It's no accident that this bucolic scene of rolling hills, two-lane roads, and horse pastures still exists just 20 miles from downtown Washington, DC. In 1998, the Prince William Board of County Supervisors adopted a comprehensive plan to protect the area from the tentacles of urban sprawl creeping from the nation's capital.

But no one foresaw the threat that booming technologies like [cryptocurrency](#) and artificial intelligence would pose to this rural enclave. [Data centers](#) already occupy 8 million square feet of space in the county. If all the proposed new data centers are built, that number could balloon to 80 million. Some advocacy groups predict that the amount of electricity these centers would need is enough to power five New York Citys.

One project in particular is accelerating that growth. In a December 2023 meeting, the board of supervisors approved the largest data center campus on the planet, a project called Digital Gateway, which will include 23 million square feet of data center space across **2,100 acres of former farmland**. The energy to run such a ginormous facility could require about 750,000 homes'

worth of electricity, according to the National Parks Conservation Association. Owing to a lack of renewable energy, much of that will come from fossil fuels.

A large data center can guzzle up as much as 5 million gallons of water a day, the equivalent usage of a town with 50,000 people.

In terms of harm, the construction of this facility—on land next to [Manassas National Battlefield Park](#)—will be a twofer, undermining the state's goal to decarbonize the electrical grid by 2050 while also obliterating wildlife habitat. The twin threats have sparked opposition from local and national environmental groups, which are increasingly focused on the adverse effects of a growing information economy.

"What do we genuinely want our society to look like 100 years from now?" asks Kyle Hart, a program manager for the National Parks Conservation Association, which opposed the project.

Now only a couple of lawsuits and the determination of conservation advocates stand between these pastoral panoramas and Digital Gateway. While the lawsuits—which hinge on whether the county provided proper notice of the board meeting—wind their way through court, the newly formed Virginia Data Center Reform Coalition has asked the state government to step in and prevent projects like Digital Gateway from being green-lighted again. Made up of more than 25 organizations, including the Sierra Club's Virginia Chapter, and homeowners' groups, the coalition thinks the state can do more to reduce the impacts on the surrounding community and ecosystems.

"We need statewide reform," says Julie Bolthouse, director of land use for the Piedmont Environmental Council and a co-organizer of the reform coalition with Hart. "We can't do this Whac-a-Mole. We're not winning a single data center battle."

Northern Virginia's zoning laws are partly to blame. The first data center in the region was built in the early 1990s by America Online. Bearing little resemblance to today's monstrosities, it was integrated into an office park along with shops and restaurants. "It was honestly really desirable," Bolthouse says. So desirable that many counties in the region implemented "by right" zoning for data centers, requiring boards to approve applications as long as the centers satisfy a few basic conditions such as height and size requirements.

Today the AOL campus is a pile of rubble on its way to becoming another hulking center in the middle of what's known as Data Center Alley, a cluster of nearly 300 centers that together host 70 percent of the world's internet traffic. In tandem with generous tax breaks, the area's zoning laws have resulted in the construction of data centers adjacent to schools, nursing homes, and housing developments.

They're why the Tippet's Hill Cemetery, an active and historic African American burial ground—with headstones dating back to 1863—is now surrounded on three sides by data centers. They're why joggers on the area's popular rail trail now take in views of diesel generators during their morning miles. They're why many residents of Village Place, a tidy neighborhood in the once-rural town of Gainesville, look out their bedroom windows to see the yawning gray walls of a data center.

Hart and Bolthouse are clear: The reform coalition isn't calling for a moratorium on data centers in Northern Virginia but rather a more circumspect and transparent planning and approval process—especially when it comes to power usage. "There should be a requirement that these impacts are covered by the industry," Hart says. The coalition is petitioning the state to mandate that data center developers pay for their own energy needs—or, ideally, run their facilities on renewable energy.

In addition to their energy needs, data centers require water for evaporative cooling systems that keep servers from overheating. A large data center can guzzle up as much as 5 million gallons of water a day, the equivalent usage of a town with 50,000 people. **Data centers that power AI applications need even more water. For every 50 questions it's asked, ChatGPT requires the equivalent of a 16-ounce bottle of water. In Virginia, some developers have requested permission to tap the county's groundwater for their cooling systems.**

Proponents of the data centers argue that the burden on ratepayers and the drain on natural resources is a small price to pay for the tax revenue pouring into the county's coffers—money that can be used to improve public schools and aging infrastructure. But Hart argues that relying on tax revenue from data centers sets a dangerous precedent. "When your county is the data center capital of the world, your budget becomes so dependent on that tax revenue that you almost have to keep new systems in the pipeline to keep feeding the monster," he says.

Depending on how the lawsuits shake out, in a few years, visitors to Manassas may find themselves in a construction zone, where dump trucks and jackhammers are the soundtrack to an afternoon hike. Or maybe not. Thanks to the tireless work of conservation advocates so far, the turkeys and foxes and wildflowers of Prince William County still have a home.

Ashley Stimpson is a Maryland-based freelance journalist whose work has appeared in The New York Times, The Washington Post, Science, Popular Mechanics, and many other outlets. She is a 2024–2025 Alicia Patterson Fellow.

James, Karen

From: DIANE & BRUD BICKNELL <bicknell0104@comcast.net>
Sent: Saturday, July 19, 2025 7:53 AM
To: Planning Commission
Subject: CDI Limitation for the Health of Our County - Learn from Prince Wm Co. Virginia Part 2

[EXTERNAL EMAIL]

https://www.princewilliamtimes.com/news/data-center-demand-brings-first-gas-substation-to-nokesville/article_39921fd7-9a6b-4679-9146-ef7209deb9d9.html

Data center demand brings first gas substation to Nokesville

Facility will use potent greenhouse gas, critics say

- By Jill Palermo Managing Editor

- Jul 14, 2025 Updated Jul 15, 2025

Dominion Energy is planning a new “gas-insulated” substation to replace the existing substation at Vint Hill Road and Reid Lane. The area is where three existing high-voltage transmission lines converge.

Western Prince William County needs an infusion of electricity to avoid getting close to running out of power by as soon as 2027 due to soaring demand from power-hungry data centers.

That will mean big changes for a stretch of Vint Hill Road that's already a tangle of high-voltage power transmission lines.

Dominion Energy plans a major upgrade of an existing electrical substation near Vint Hill Road and Reid Lane in Nokesville. That's where a picturesque, mostly rural roadway is interrupted by a confluence of three high-voltage power transmission lines with giant metal poles and towers.

Right now, only two of the three high-voltage lines feed the existing substation there. The large, 500-kilovolt lines strung atop a pair of power towers do not supply electricity to the substation, but only pass by it. That will change once Dominion Energy's upgrade is completed.

The new, expanded substation will draw down power from all three lines to inject the local grid with more electricity, said Stefan Haas, a Dominion Energy representative who helped explain the upgrade during an open house meeting at Marsteller Middle School last week.

The upgrade is necessary because western **Prince William County's rising demand for electricity — driven almost exclusively by data centers — will soon tap out the power delivered via the closest 500-kilovolt-fed substation**, which is in Fauquier County, according to Dominion Energy documents filed with Prince William County.

What's a gas-insulated substation?

But plans for the substation are already sparking controversy because Dominion Energy must use "gas-insulated technology" to allow the three high-voltage lines to feed a substation in a relatively constrained area.

Such substation will use a manmade gas called sulfur hexafluoride to allow the power to move safely through a confined space. Dominion will have to build two 30-foot-tall buildings at the site to house the gas lines and equipment needed for the process.

The downside is that sulfur hexafluoride is an extremely potent greenhouse gas, according to the U.S. Environmental Protection Agency.

"When you're building a data center at \$2 million an acre, that makes land very valuable. The total space required for a (gas-insulated) substation is less than a tenth of (that required for) an air-insulated system. And that's really what the advantage is," said Elizabeth Ward, a chemical engineer and a member of Prince William County's Sustainability Commission. "That's why they're doing it. It's a matter of making it fit without requiring more land."

Ward also said the **gas will exist in the atmosphere for up to 1,000 years**.

Utilities employ safeguards to keep the gas from leaking but some can escape during manufacturing, installation and maintenance of equipment, the EPA website says.

"Leaks from sulfur hexafluoride will be the gift we leave to our descendants — not (just) our grandchildren. Not (just) our grandchildren's grandchildren," Ward said.

Dominion Energy says there's no other gas it could use in the substation and that the operation will be safe.

"We want to be clear: sulfur hexafluoride is not released into the atmosphere during normal operations. The system is sealed, secure, and specifically engineered to ensure safety for both the public and our crews," said Aisha Khan, a Dominion Energy spokesperson, in a statement. "Safety is the foundation of how we design and operate our facilities, and we build to the highest industry standards."

Europe is phasing out the gas, and California has already started to ban it on certain equipment, Ward said. This would be the first substation of this type in Prince William County.

Dominion Energy does not yet have an estimate for how much the substation will cost because it is still "conceptual," Khan said.

The price will be paid by all Dominion and NOVEC customers, according to Virginia law.

The project does not need approval from the State Corporation Commission, but it will need a special use permit and a public facility review from Prince William County's planning commission and board of supervisors. The project is expected to come before the planning commission in September, according to Bobby McMahon, a Dominion Energy spokesman.

Jean Beard, chair of Prince William Conservation Alliance, which has been critical of the rapid growth of data centers in Prince William County and the infrastructure required to power them, said such projects are all the result of just one industry.

"The substation may be framed as routine or necessary, but make no mistake, it's driven by the energy demands of massive, energy-intensive data centers, and Dominion is scrambling to keep up," Beard said. "Our localities have approved far more data centers than our current electrical grid can support."

Reach Jill Palermo at jpalermo@fauquier.com

James, Karen

From: DIANE & BRUD BICKNELL <bicknell0104@comcast.net>
Sent: Saturday, July 19, 2025 8:18 AM
To: Planning Commission
Subject: CDI Limitation Request - Why 1%

[EXTERNAL EMAIL]

Today you have the power to define the priorities of Frederick County. Are we still the bucolic agricultural community that has, for years, set aside farm land as **priority preservation** areas, honoring a rich agricultural heritage? Or are we the next Prince William County (VA) which, only a few years ago, opened its doors to data centers that have now forever blemished the landscape, thumbed their 75' concrete noses at concerned county residents, dangerously depleted resources, and drastically/negatively altered the feel of the county's small towns?

The Planning Commission has the power NOW to protect Frederick County with a vote to limit the scope of data center invasion to the currently approved Quantum property.

Frederick County is under no obligation to sacrifice a whopping 1% of its land to these 75' resource-grabbing monstrosities. NO OBLIGATION!

A re-commitment to the limited site can still be a win/win situation. The data centers win by gaining a huge complex to do business. The county wins with the added revenue generated by the new use of previously scarred, unused Quantum land.

I implore you to put a hold on data center expansion as you review the CDI. Let's live with the currently approved Quantum site for at least five years to see what the cost/reward is for our county and its residents.

Thank you for hearing my plea.
Diane Bicknell

James, Karen

From: L R <rromdiver@gmail.com>
Sent: Saturday, July 19, 2025 9:40 AM
To: Planning Commission
Subject: Data Center

[EXTERNAL EMAIL]

Dear Planning Commissioner:

MEDICAL OPINION:

The 2100 acre East Alco property is about to become a Stage 3 Cancer.

Stage 1 Cancer: Began with approval of a data center. Virginia's experience proved these developments are not "benign".

Stage 2 Cancer: Current status of expanding into all 2100 *toxic* acres.

Stage 3 Cancer: This spread into nearby tissues starts if your Planning Commission allows expansion into Rural Legacy/Priority Preservation farmlands.

Stage 4 Cancer: Metastatic Cancer was Quantum past CEO's original plan "to hook up with *nearby* Virginia's" data centers (20 *miles* away).

The Commission's formal name includes "Frederick County" not "Quantum".

Please do the right thing for Frederick County residents.

L.D. Romane, M.D.

James, Karen

From: Roberto Rodriguez <puertoriconyctppd@gmail.com>
Sent: Saturday, July 19, 2025 9:45 AM
To: Planning Commission
Subject: Please Do Not Expand the CDI Overlay Zone Beyond the Existing Growth Area

[EXTERNAL EMAIL]

Dear Members of the Planning Commission,

I am writing to express my strong opposition to the proposed expansion of the Critical Digital Infrastructure (CDI) overlay zone beyond the existing designated growth area.

As someone who has lived in this area since 2002, I have seen firsthand how valuable our farmland, open space, and rural communities are—not just for the local economy, but for the identity and quality of life in Frederick County. The Rural Legacy and Priority Preservation Areas were thoughtfully established to protect some of the most fertile and productive farmland in the region, and they must remain intact.

There is already 2,000 acres within the existing growth area—specifically, the Quantum property—that can be developed for data centers. Expanding the CDI zone beyond this area would result in the irreversible loss of agricultural land, harm our rural communities, and bring industrial infrastructure uncomfortably close to residential neighborhoods.

I respectfully urge the Planning Commission to keep the CDI overlay zone within the current growth boundary and reject any proposal that would redraw preservation areas or expand into rural land.

Thank you for your consideration and commitment to responsible, balanced planning.

Sincerely,

Roberto Rodriguez

James, Karen

From: Lilly Ricketts <lilly.ricketts8@gmail.com>
Sent: Saturday, July 19, 2025 10:41 AM
To: Planning Commission
Subject: CDI

[EXTERNAL EMAIL]

Good afternoon,

I am Lilly Ricketts and I live at 1242 New Design Road in Adamstown. I am writing in the hopes that you will seriously consider not expanding out of the existing growth area as well as refraining from redrawing the Rural Legacy area or the Priority Reserve area. Doing so would set precedents for our protected land, making it less secure and lessening the importance of the act of putting it in protection itself. After all, if it can be stripped of its protection for any reason, what is the point of that protection at all?

Further, no one knows how these data centers will run in our area. There have not been any in depth tests on how it will affect the local population and infrastructure. There are 2,000 acres already set aside for them, and it would be foolish to expand this area before even finishing construction on the existing projects and seeing how they work and impact the community. What we do know is that they take a lot of resources like electricity and water. People who live next to existing working data centers report that their homes will randomly lose power because of them, a problem that they never had prior. Additionally, there may not be a need for so many centers; more efficient ways of storing data are being explored without the need for so many large facilities.

Is it worth gambling on the well-fare of the community, whom you are supposed to protect and speak for, and on the health of the land, some of the most fertile land in Frederick County, for something so disruptive, expensive, and potentially wasteful? The data centers will not enrich our local community, as they offer hardly any employment. They consume huge amounts of resources that would be better used to serve the people. They spew noise pollution alongside normal pollution, and they do not offer anything in return to us. They will take the land from farms, families, and ecosystems. I know there is monetary gain in it for you and the County, but that comes at the expense of the rest of us and possibly even future residents of Frederick. I ask you to reconsider this decision, and do your due diligence in testing the impact they will have.

Thank you for your time,
Lilly Ricketts
Resident of Adamstown in Frederick County

James, Karen

From: Martha Morris <morrism@email.gwu.edu>
Sent: Saturday, July 19, 2025 2:45 PM
To: Planning Commission
Subject: CDI Frederick county

[EXTERNAL EMAIL]

Dear Commission I am a resident of southern Frederick county and wish to express my opinion about the data center expansion in our county. Please do not expand the CDI overlay out of the existing growth area. Also please do not redraw the Rural Legacy Area or priority preservation area to expand the growth of data centers. Our rural legacy area is critical for long term preservation and supports the quality of life for our residents and visitors.

Respectfully submitted

Martha Shannon

Point of Rocks, Md

James, Karen

From: Debbie Butler <castractor53@gmail.com>
Sent: Saturday, July 19, 2025 4:32 PM
To: Planning Commission
Subject: The data center

[EXTERNAL EMAIL]

I live on top this data center please stop know more taking of land let us have the farm land for our old age and kids who wants to look at this I've lived in Adamstown for 67 yrs and my mom is 92 and can't take all the building around stop and think would you want this in your face these generators are loud and will get louder I tired to tell the county they are lying to them and money talks I guess stop now before we will have a community meeting and caring signs if that what it takes to stop we will call channel 7 news and news and post we in Adamstown mean business if that what it takes think before you act

James, Karen

From: Pam Gentel <plsgentel@comcast.net>
Sent: Saturday, July 19, 2025 4:37 PM
To: Planning Commission
Subject: Concerns on CDI Overlay Zone and Data Centers

[EXTERNAL EMAIL]

I am writing to share my strong concerns regarding the proposed CDI Overlay Zone and the development of data centers along Ballenger Creek Pike. As a lifelong resident of Frederick County and a homeowner on Dover Drive in Windsor Estates since 2003, I feel compelled to raise several important questions.

Our community relies entirely on individual wells and septic systems, yet I've found no publicly available studies—either on Frederick County's websites or elsewhere—about how the immense water demands of data centers might impact local groundwater levels. Until these issues are thoroughly addressed, I am firmly opposed to expanding the CDI Zone or approving any data center construction outside the boundaries of the Eastalco site.

Key concerns that need to be researched include:

1. How will the increased water usage affect our aquifers?
2. Will baseline well measurements be established and monitored throughout construction?
3. Will the county conduct regular testing for contaminants in residents' wells?
4. Will the county be accountable for wells that dry up or become contaminated?
5. Have any studies been done to assess additional flooding risk along Ballenger Creek Pike due to loss of permeable farmland?
6. Has proper environmental consideration been given to impacts on Tuscarora Creek, local wildlife, and especially the bald eagle nest nearby?

7. Will these data centers be subject to water use restrictions during county-wide conservation mandates?

Frederick County's rapid growth is often touted as beneficial, yet the visible consequences for residents seem to be increased traffic and loss of beloved community spaces—such as our bowling alley. I would also like clarity on whether these data centers qualify for Maryland's 10-to-20-year Sales and Use Tax Exemption. If they do, what tax revenues will the county receive, if any? And what happens when this technology becomes obsolete in the next two decades?

I respectfully request your office share the data, both supporting and opposing, that was used to justify these overlay expansions and data center approvals. Our community deserves transparency and informed planning when decisions of this magnitude are made.

Thank you for time

Pamela Gentel
Windsor Estates

James, Karen

From: Emily OHara <emilykohara@yahoo.com>
Sent: Saturday, July 19, 2025 4:41 PM
To: Planning Commission
Subject: CDI=Critical Digital Infrastructure

[EXTERNAL EMAIL]

My position is simple:

- 1- There is not an issue with creating a CDI overlay zone for data centers but,
- 2- Do Not expand the CDI overlay zone out of the EXISTING growth area.
- 3- Do Not redraw the Rural Legacy Area or the Priority Preservation Area to allow the expansion of the existing growth area/CDI overlay zone.

Thank you,
Emily OHara

James, Karen

From: Robert Hogue <rhogue2136@gmail.com>
Sent: Saturday, July 19, 2025 5:31 PM
To: Planning Commission
Subject: Data Centers
Attachments: EastalcoGrowthArea.jpg; Preservation2025.pdf; Proposed CDI Overlay.jpg

[EXTERNAL EMAIL]

This email is in reference to the data center (CDI=Critical Digital Infrastructure) issue in Adamstown. My position is simple:

- 1- There is not an issue with creating a CDI overlay zone for data centers but,
- 2- Do Not expand the CDI overlay zone out of the EXISTING growth area.
- 3- Do Not redraw the Rural Legacy Area or the Priority Preservation Area to allow the expansion of the existing growth area/CDI overlay zone.

I've attached three maps, the existing growth area, the preservation area map, and the proposed CDI overlay zone. You will notice that the existing growth area expands to the boundaries of the preservation areas (Rural Legacy and Priority Preservation). The areas outside of the existing growth area had been identified by both the county and state as where the best soils exist and where would be the most effective in having large continuous tracts of land needed to be kept in agriculture to support a strong ag community and ag industry. Any expansion of the growth area will have to be removed from the preservation areas and have a detrimental effect on the community.

There are almost 2,000 acres within the existing growth area that can be developed for data centers. There is no need to expand further right now especially when it impacts the ag industry and the rural communities. The third map is the proposed overlay. Notice the yellow areas are residential communities and the expansion shown gets close to those communities and it could get even worse. Then consider the two resources used in large quantities by data centers, water and power. FirstEnergy/Potomac Edison told the data center workgroup that the infrastructure (transmission lines) are not in place to handle the 1,500 acres currently zoned industrial if data centers are built there. AND we are in an energy crisis as it is which is why our electric bills are increasing dramatically. The first 3 properties with this industrial area have already used the county allocated potable water supply of 1.2 million gallons per day. There are major concerns regarding power and water with just the industrial zoned area within the existing growth area. This should have the county restricting data centers even more than this, but certainly not expanding where they can be built. PLEASE preserve this land and do not expand into the Rural Legacy Area. Farming is important and the backbone to America.

James, Karen

From: Angela Cook <dogmom65412@gmail.com>
Sent: Saturday, July 19, 2025 5:37 PM
To: Planning Commission
Subject: Proposed CDL overlay

[EXTERNAL EMAIL]

Dear Planning Commission:

We are requesting that you do not expand the CDI overlay zone or redraw to allow for expansion. Please honor and protect the priority preservation area as well as rural legacy areas.

James and Angela Cook
4501 East Basford Road
Frederick Md 21703
301-693-1314

James, Karen

From: Bridget Stone <nigelbridget@gmail.com>
Sent: Saturday, July 19, 2025 6:07 PM
To: Planning Commission
Subject: Expanded Critical Digital Infrastructure Map and the Devastating Effect on Agriculture and Adamstown

[EXTERNAL EMAIL]

Dear Planning Commission members,

As naturalized US citizens and residents of Frederick County for almost twenty-nine years, we value the natural beauty of our surroundings and the fact that we live in "the country" which is so easily accessible from our home outside of the Frederick city limits, and close to Jefferson, Middletown, Point of Rocks and Adamstown, where several family friends reside.

We have seen enormous changes since we first moved to Frederick County in 1997, and we are surprised every time we take a drive to somewhere we haven't been in a while and find unbelievable development of high-density housing and huge warehouse-type buildings for digital infrastructure purposes. We have noticed the significant impact on our roadways due to the increased population. As an administrator at a private school, I have observed how frequently students are tardy due to accidents on roads that are not intended to accommodate such a rapidly growing population. The number of farms that have disappeared from our landscape is alarming, altering the nature of our county and impacting families who wish to continue making their livelihood in agriculture. Their families have generations of farming experience that they want to preserve and continue to pass down. Growing food for our population and beyond is imperative for our community to retain its long heritage of dairy, cattle, and crop farmers.

We are not in favor of the expanded CDI map and would like to ask you to vote against it so that Adamstown and the surrounding highly arable lands do not suffer irreparable damage, thereby changing the character of that part of Frederick County.

In your position, you bear an enormous responsibility to serve your constituents. We hope the opinions of concerned citizens are respected and valued as you make decisions that could have serious and possibly devastating consequences.

Thank you for your consideration.

Regards,
Bridget Stone
5507 Woodlyn Rd
Frederick, MD 21702

The end of all things is near. Therefore be alert and of sober mind so that you may pray. Above all, love each other deeply, because love covers over a multitude of sins. ~ 1 Peter 4:7-8 NIV

James, Karen

From: Dalena Bryant <dalenabryant@gmail.com>
Sent: Saturday, July 19, 2025 6:27 PM
To: Planning Commission
Subject: CDI

[EXTERNAL EMAIL]

Good evening,

Position of the community stand as there is not an issue with creating a CDI overlay zone for data centers but, DO NOT expand the CDI overlay zone out of the EXISTING growth area, DO NOT redraw the Rural Legacy Area or the Priority Preservation Area to allow the expansion of the existing growth area/CDI overlay zone.

We're already in an energy crisis and it's been stated by the power company that it can't handle this much energy, everyone's electric bills are increasing rapidly. In addition to that, it will cause issues with the water supply and possibly cause shortages there too.

This will severely negatively impact the community and agricultural industry. Frederick County was once a hugely rural area, please do not continue to diminish once rich agricultural grounds and roots.

Sincerely,
Dalena Bryant

James, Karen

From: Joanna <jos1299@comcast.net>
Sent: Saturday, July 19, 2025 6:58 PM
To: Planning Commission
Subject: CDI Adamstown

[EXTERNAL EMAIL]

Good evening,

My family has lived in Adamstown for 24+ years. To have it ruined by data centers and a company that really doesn't care about the surrounding property is devastating. Adamstown had a beautiful landscape. It was bad enough when warehouses popped up, but those have seemed to serve the community with their businesses. These data centers will not. The old Alcoa property did not have the infrastructure to support the development of the data centers and we have had to deal with construction, road blockages and dirt throughout the town. On New Design Road, they dug up the grass and now weeds grow in their place. While they have been able to build multiple buildings on the Alcoa property, they have done nothing to preserve the forestation or plant trees to lessen their impact to the surrounding property. Additionally, Adamstown already suffers from regular blackouts. The power doesn't seem to be stable - even with a substation. What is going to happen when those centers are operational? What is being done to ensure they stay in compliance? The county council seems unable or unwilling to ensure they comply.

I implore you, please do not expand the CDI area. Confine them to the 2K acres on the Alcoa property and require them to comply with the rules. It's a shame that our landscape has been taken over, we shouldn't have to lose more.

Additionally, Adamstown houses an elementary school. Any idea what these data centers do to developing children? I don't know, but do we really want to find out years down the road that a problem that could have been prevented, wasn't? Carroll Manor Elementary school also has programs for students with sensory needs. What do you think the hum of the data centers will do to them? Do not let the centers get any closer.

Take a ride down Ballenger Creek pike and you'll see their mess. They don't live here. They don't care. They don't pay property taxes.

I appreciate your time.

Joanna Sieger

Adamstown, MD

James, Karen

From: Caroline Salisbury Orlowski <caroline.orlowski23@gmail.com>
Sent: Saturday, July 19, 2025 7:21 PM
To: Planning Commission
Subject: Do Not Expand the CDI Overlay Zone

[EXTERNAL EMAIL]

Dear Planning Commission,

I am writing to express my concerns about expanding the CDI overlay zone for data centers outside of the existing growth area and the Quantum property. Data centers utilize 3 very important and limited Frederick County resources - farmland, water, and power. We do not need to cater to these data centers (and continue to expand their already large potential footprint) at the expense of our county's valuable resources. Please do not expand the overlay zone, and in particular, please do not redraw the rural legacy or priority preservation areas.

Thank you for all the important work you do for our county.

Caroline Orlowski
Knoxville, MD

James, Karen

From: Marie and Lauren Bicknell-Gilbert <thebicknellsgilberts@gmail.com>
Sent: Saturday, July 19, 2025 8:58 PM
To: Planning Commission
Subject: Oppose CDI expansion

[EXTERNAL EMAIL]

Dear planning commission,

My six year old daughter wanted to write to express her opposition to the expansion of the CDI area. She wrote and illustrated her thoughts, attached below. Even at her young age, she sees the value in protecting these essential farmlands, though she put it more directly— “save our cornfields!”

Sincerely,
Rory (via mom)



James, Karen

From: Ava Snesrud <asnesrud@gmail.com>
Sent: Sunday, July 20, 2025 6:27 AM
To: Planning Commission
Subject: Adamstown, MD Critical Digital Infrastructure Map Proposal Concerns

[EXTERNAL EMAIL]

Good morning. I am a concerned citizen living near Adamstown, MD.

The Eastalco property now Quatum property is already in the growth area. If the CDI is expanded beyond the Quantum property it will affect rural legacy and/or priority preservation areas that have been previously established. Just a quick side note, the 2000 acres of the Quantum property is some of the most fertile land in Frederick County which we will lose to data centers.

With all this being said I am proposing that

- 1- There is not an issue with creating a CDI overlay zone for data centers but,
- 2- Do NOT expand the CDI overlay zone out of the EXISTING growth area.
- 3- Do NOT redraw the Rural Legacy Area or the Priority Preservation Area to allow the expansion of the existing growth area/CDI overlay zone.

Our farms are already struggling, they don't need data centers taking over their lands too. It is bad enough that farms cannot make it financially and then get turned into huge housing communities with houses stacked in one on top of another.

Please help to preserve our rural area. We need to keep it a rural area. Think of the environment. The takeover of data centers will certainly harm the environment and our farmers. I hope you can limit the growth of data centers in our area. It is so hard to help people see past their own noses when it comes to money and development. Money is not everything, but preserving our local food production, the health of our environment, and sustaining our rural area is. Please take this into consideration when voting.

James, Karen

From: Sean Kirchhoff <tptboy@hotmail.com>
Sent: Sunday, July 20, 2025 1:12 PM
To: Planning Commission
Subject: Comments on CDI Overlay Proposal

[EXTERNAL EMAIL]

Dear Planning Commission,

I am an 8-year resident of Adamstown, MD, and plan to live here in this wonderful rural community for another 30+ years. I want to comment on the proposed CDI Overlay Zone.

First, I understand the need for "progress," and having modern industries in our area. I applaud the county for its decision to use the former East Alco site for a modern, planned data center campus. It was a great choice for an already-industrialized area, and the vision for controlled, sustainable industrial growth made a lot of sense.

However, I am concerned with the proposal to expand the area of the data centers. It is not clear that it benefits those of us in Adamstown and Buckeystown, nor is it clear how it will affect the county's infrastructure. This proposal is YEARS too soon.

We have only just begun to see the effects of construction on our area, and have ZERO knowledge of how the data centers will affect us once they are operational. Despite reported plans to upgrade roads and intersections from Mountville Road to Ballenger Creek Pike, nothing has been improved, and construction traffic has made a mess of the area.

I have not seen an independent cost-benefit analysis done to inform the decisions of the County Executive, County Council, or the Planning Commission. How can ANY of you make an educated, informed decision without an independent report? How will affect our electric grid? Our water supply? Water runoff? Sewers? Noise and light? Ground vibration?

I implore you to pause the planning to move forward on such a large expansion of the existing data center campus. There is plenty of space there now, which still has not been developed for use. I would like to WAIT until at least 50% of the currently-approved space is operational so we can better understand the impact of these data centers on our infrastructure and communities. If you decide to move forward on anything, I encourage you to consider upgrading our electric grid and water resources first. I demand that you reconsider the distance from any residential or school building to be far greater than any reports I have seen to this point.

Please keep Adamstown and Buckeystown the beautiful, natural resources they currently are. We have many great farmers in the area who use the fertile land for so much. We community members love seeing nature and not hearing industry. Please press pause on the expansion, and please study the effects more before deciding to expand any zoning for additional industry in this part of the county.

Thank you,
Sean Kirchhoff

Adamstown, MD

James, Karen

From: jon@tuscarorafarms.com
Sent: Sunday, July 20, 2025 1:47 PM
To: Planning Commission
Subject: Overlay comments

[EXTERNAL EMAIL]

Hello friends at the planning commission,

I have some thoughts on the most recent overlay proposal that I would like you to consider.

I would like to introduce myself. I currently operate and own four farms in the Tuscarora, Adamstown, and Point of Rocks area. That encompasses 1,200 acres and we also produce 55,000 turkeys annually. I also used to serve on the Frederick County Agricultural Preservation Board. I have an Agronomy degree from the University of Maryland, and am also a first generation farmer.

I would request that the county council consider the following and put aside potential income tax implications:

- First and foremost, the area in question (the overlay) is some of the best farmland in Frederick County. The area outlined has been historically designated as a priority preservation area for many years and for a simple reason which is significant because it's incredibly productive and is an important part of Frederick County from an agricultural and frankly community standpoint. I'm questioning why that stance appears to have changed recently,
- Power demands. Data centers consume enormous amounts of energy, in fact it's way more than our current power grid can supply...by a wide margin. 2.2 gigawatts is unsustainable under the current grid especially given the recent closures of power plants.
- The implications from this project will result in multiple new powerlines running through three of my properties, having an adverse effect on how I make a living, and ultimately diminishing the value of my properties.
- So, I think it would be prudent for the county council to ponder how each one of you would respond if it was actually directly impacting you and your way of life.
- Those are my thoughts on this matter as a resident and tax payer of southern Frederick County. Please use caution when deciding on these crucial matters that affect people that live here and value the tradition that has historically made Frederick County a great place to live.

Best Regards,

Jon Sewell

5323 Tuscarora Rd

Tuscarora MD 21790

240-575-4926

James, Karen

From: Nancy MacGregor-Zito <nancymac2@yahoo.com>
Sent: Sunday, July 20, 2025 2:23 PM
To: Planning Commission
Subject: CDI concerns

[EXTERNAL EMAIL]

I am writing to you to express my concerns with the CDI overlay in Adamstown. I have lived in Adamstown for the last 17 years, and have enjoyed the peaceful rural setting. I have been sadly watching this area add more residential and now industrial zoning.

I was disappointed to see your proposed map that would encompass a huge number of acres beyond the existing growth area. I'm also concerned to hear that you want to redraw the Rural Legacy Area or the Priority Preservation Area already established. Why are you considering giving more of our farms to Data Centers when we don't know if it will be needed, or if we will have enough electricity and water for them without raising power and electric bills for residents? Have we not learned anything from the Data Center explosions in Virginia?

I understand that this would provide a lot of money to the county, (but I sincerely hope that that is not the only reason you are wanting to allow this), but it will also do so much irreversible damage to the land and probably to the value of our homes. I've just retired from FCPS after almost 20 years of working with our most vulnerable and troubled children, earning less than \$20,000 a year for most of the time. I did this because I felt like I was making a contribution to Frederick County and its children, however, that did not allow me much extra money. I need to be able to sell my house at full value in order to support myself in retirement, which is going to be difficult to do when there are giant, unattractive Data Centers right outside my development.

Please consider the above when making your recommendations for the CDI plan.

Thank you,

Nancy MacGregor
5617 Haddington Drive
Adamstown, MD 21710

James, Karen

From: jl4313@comcast.net
Sent: Sunday, July 20, 2025 2:40 PM
To: Planning Commission
Cc: jl4313@comcast.net
Subject: CDI Overlay zone

[EXTERNAL EMAIL]

CDI Overlay Zone

[Draft]

Planning Commission

I am writing to the Frederick County Planning Commission to express my displeasure with the proposed Critical Digital Infrastructure (CDI) Overlay Zone. I am STRONGLY OPPOSED to the proposed CDI Overlay zone. The current and existing Quantum Loop property (the former Eastalco property) is more than enough land for any and all data center development within Frederick County. I encourage the Planning commission to NOT INCREASE or expand the CDI Overlay zone beyond the EXISTING Quantum Loop property.

Please do not redraw the Rural Legacy Area or the Priority Preservation area to allow for the expansion of the existing growth area or the proposed CDI Overlay zone.

Where will the millions of gallons of water and gigawatts of electricity come from for the proposed (or future) data centers? Expanding data centers beyond the current existing property will put Frederick County, and Maryland, at risk for water shortages and electrically outages or brownouts.

Do not make the Adamstown/Buckeystown area into a new "North Ashburn" data center alley.

John Long
301-471-0517
JL4313@comcast.net

James, Karen

From: Elizabeth Law <bettybob1758@gmail.com>
Sent: Sunday, July 20, 2025 3:35 PM
To: Planning Commission
Subject: Comments Regarding CDI Overlay Zone
Attachments: Letter to PC on CDI-ZO.docx

[EXTERNAL EMAIL]

Chair Tim Davis, Vice Chair Mark Long, and Commissioners,

Please see below and attached, my comments regarding the CDI Zoning Overlay.

As an Electric Power engineer, I am again stating that there is no power and very little water available for any data center expansion. Because facts are ignored do not make the facts untrue.

If the CDI Overlay Zone is approved with the expansion of the Catellus and Pleasants properties people who live in the Adamstown area will see their property values plummet. They will experience years of anxiety even if the additional data centers are never built. That is why I ask you to limit the CDI Overlay Zone to the present Catellus site. There is no evidence that the expansion is needed or of benefit to the community.

The only viable way to power data centers beyond those already holding Site Plan approval is to bring more power from Pennsylvania. Multiple transmission lines, suspended from 200-foot-high towers will cut through ever more established farms and homesteads to converge at Adamstown.

The County Council says that it is opposed to the MPRP transmission line yet the proposed expanded CDI Overlay Zone will encourage building such transmission lines. Does the left hand know what the right hand is doing on the County Council? This is what comes of ignoring facts.

However, in Pittsburgh at the *Carnegie Mellon Energy Summit*, the executives of Westinghouse Nuclear, industry giants like Amazon and the President of Carnegie Mellon University invited Donald Trump to inaugural ceremonies to unveil plans for a Data Center Hub.^[1] Carnegie Mellon University's website includes a map showing the giants of the industry such as Meta, Google, Amazon, and Oracle settling into Western Pennsylvania.^[2]

At the Summit, Westinghouse announced that it plans to build 10 new nuclear power plants in the United States, construction to start in 2030.^[3] You will have heard of the nuclear plants in Pennsylvania slated for recommissioning and dedicated for Amazon and Meta data centers. There are no such plans for Maryland.

Meanwhile, Amazon is only renting space at Catellus. Might this only continue until Amazon establishes its operations in Western Pennsylvania? What then? Will Frederick be caught with gigantic 75-foot-tall buildings? Why won't Frederick County require that the data centers provide an escrow account to provide for such contingencies?

Perhaps some of our politicians choose to ignore unhappy facts lest they stand in the way of all positive spin. But perhaps the politicians do understand that they are coming from behind in attracting data centers.

Perhaps to attract customers, each iteration of the CDI Siting Ordinance eliminated more and more protections from the County Executive's draft until the final 25-05 Bill:

- 1 – removed complaint driven monitoring for sound and vibration violations
- 2 – changed independent monitoring from twice a year to a company self-report every two years.
- 3 – eliminated the requirement to test for adherence to sound and vibration limits when construction is completed and prior to operation.
- 4 – Changed proximity from “not near residential” to “within 200 feet of residential”, and after public objections to “within 500 feet” (Note this also fits neatly with the proximity of Mr. Pleasant's and Catellus' properties to residential areas. See *Map 2 – Proposed CDI-Overlay Zone areas 4 and 5.*)

Pittsburgh believed that its steel plants would go on forever until the 1970's when foreign competition and the public's demand for pollution controls closed down their plants. The area was left with a panorama of rusting blast furnaces and foundries for years. The public had to pay for their removal.

Is Frederick County capable of learning from such experiences as Pittsburgh? What do you think? After all nothing lasts forever.

Please allow the industry to build out the Catellus site first and to prove its worth to the community. The expansion is not warranted.

Sincerely,

Elizabeth Law, P.E. (retired)

1758 Wheyfield Dr. Frederick, MD 21701

¹¹ <https://www.cmu.edu/news/stories/archives/2025/july/energy-and-innovation-summit-brings-government-and-industry-leadership-to-cmu>

¹² <https://www.cmu.edu/news/stories/archives/2025/july/cmu-startups-bring-energy-innovation-to-market>

¹³ <https://www.cnbc.com/2025/07/15/westinghouse-plans-to-build-10-large-nuclear-reactors-in-us-interim-ceo-tells-trump-.html>

James, Karen

From: Patty Thompson <patty125@icloud.com>
Sent: Sunday, July 20, 2025 3:24 PM
To: Planning Commission
Subject: CDI

[EXTERNAL EMAIL]

I want to say "DO NOT Expand the CDI overlay zone out of the existing growth area.

Patricia Thompson
5910 Lawrence Ct.
Adamstown MD 21710
240-446-8125

James, Karen

From: Glenn Stunkel <a55twister@aol.com>
Sent: Sunday, July 20, 2025 3:46 PM
To: Planning Commission
Subject: Map changes

[EXTERNAL EMAIL]

I do not think it is right to take land out of any Rural Legacy or any kind of land preservation. I believe things should be done honestly. I feel that if a landowner is told their property will always be in a preservation of any kind then it should stay that way. 2000 acres is far big enough for a data center for this area. Please make the right decision for Frederick County and its land .

Glenn Stunkel

James, Karen

From: Darlene Brown <darlenerobert@comcast.net>
Sent: Sunday, July 20, 2025 5:43 PM
To: Planning Commission
Subject: Planning Commission - CDI Overlay Comprehensive Plan & Zoning Map Proposed Amendments

[EXTERNAL EMAIL]

July 20, 2025

Mr. Tim Davis, Chair
Planning Commission
Frederick County

Dear Mr. Davis,

My husband and I have been residents of Adamstown since 1999 and love living in this community. When I drive home, I am in awe of the beauty of this area and love coming home. I am not in favor of data centers for a variety of reasons, and more obviously now because my views on some of the roads I travel frequently are impacted by the view of the data centers. I am trying to be open minded but want to ensure that the data centers cannot be expanded any further in Adamstown. The Quantum property is in the growth area and that should be sufficient. I am requesting that the Critical Digital Infrastructure (CDI) not be expanded out of the existing growth area, and that the Rural Legacy Area or the Priority Preservation Area not be redrawn to allow the expansion of the existing growth area/CDI overlay zone. We need to preserve our beautiful community, agriculture, resources and country views.

Sincerely,

Mary D. Brown
5507 Doubs Road
Adamstown, MD 21710

cc:
Mark Long, Vice Chair
Sam Tressler III, Secretary
Craig Hicks
Barbara Nicklas
Elizabeth Pasierb
Joel Rensberger

James, Karen

From: Melissa Hamilton <melissasweeney91@gmail.com>
Sent: Sunday, July 20, 2025 6:11 PM
To: Planning Commission
Subject: Concerned Citizen regarding proposed CDI Map

[EXTERNAL EMAIL]

July 20, 2025

Dear Members of the Frederick County Planning Commission,

I am writing as a concerned citizen regarding the newly proposed Critical Digital Infrastructure (CDI) map and its implications for our Rural Legacy and Priority Preservation areas. I grew up on Calico Farm on Ballenger Creek Pike, graduated from Frederick County Public Schools, and now proudly continue to serve the community through my work with FCPS.

Frederick County's identity has always been rooted in its rich agricultural landscape, family farms, and open rural spaces. These features are not only a vital part of our economy and history, but also what attract families and individuals to live and work here. They are the foundation of what makes Frederick feel like home.

The proposed CDI map, as it stands, raises significant concerns. Including critical digital infrastructure within Rural Legacy and Priority Preservation areas risks undermining decades of careful planning aimed at protecting farmland and the rural character of our county. These designations were established to preserve our agricultural base, limit sprawl, and protect the environmental and cultural assets that make Frederick County unique.

The placement of large-scale data centers or digital infrastructure in these protected zones would bring irreversible changes. Increased industrial activity, traffic, noise, and resource consumption—especially water and energy—could severely disrupt farming operations and diminish the open landscape residents value so deeply. Furthermore, the precedent it sets could weaken future efforts to preserve rural areas across the county.

I urge the Planning Commission to reconsider the boundaries of the proposed CDI map and to ensure that it aligns with Frederick County's longstanding commitment to agricultural preservation. The critical digital infrastructure overlay needs to be confined to the existing growth area already designated for industrial use. I strongly oppose the redrawing of the Rural Legacy Area and the Priority Preservation Area boundaries as it will be at the expense of agriculture and the rural way of life that sustains our community.

Please continue to prioritize thoughtful, balanced growth that honors our agricultural roots and protects the character of Frederick County for generations to come.

Thank you for your attention to this important matter.

Sincerely,
Melissa Sweeney Hamilton

James, Karen

From: christina leishman <leishmancb@hotmail.com>
Sent: Sunday, July 20, 2025 8:42 PM
To: Planning Commission
Subject: CDI overlay zone

[EXTERNAL EMAIL]

My name is Gene Butler and I live at 3512 Ballenger Creek Pike, Frederick. I am against the expansion of data centers off the industrial zoned parcels at the former East Alcoa property. I am also against the addition of the Geisinger property being added to the current overlay zone as it would completely surround my family farm. As a farmer myself, I know the value of what little agricultural land we have left in this county which is why I strongly disagree with redrawing the Rural Legacy Area or the Priority Preservation Area to allow for expansion and construction of data centers.

If the planning commission allows the current proposed overlay zone to move forward with the addition of the Geisinger property then my property will be surrounded by data centers, ultimately diminishing the value of my property. I have additional concerns regarding my family's quality of life due to the noise, generator emissions, dust, traffic, and flooding caused by stormwater management issues that I already have documented with the county.

The four sites currently approved on the former East Alcoa property will max out the water and power supply. I have already lost power multiple times during current construction and I have experienced a significant problem with people trespassing on my property. I have had trespassers that either work for the current contractors or trucks pulling onto my property trying to make deliveries that do not know where to go or cannot get into the site and have tried to park on my property.

The community is already dealing with contaminated wells from the current construction. Expansion will create a need for more high voltage power lines and additional transfer stations ultimately putting more communities in danger of health problems from above and below.

I am asking you to protect this county's farm land and the well being of my community by protecting the Rural Legacy Area and Priority Preservation Area designations and not allowing the expansion of the CDI overlay outside of the former East Alcoa property. Thank you,

Gene Butler

Sent from my iPhone

James, Karen

From: Bernard And Kim Sweeney <calicofarm94@aol.com>
Sent: Sunday, July 20, 2025 8:43 PM
To: Planning Commission
Subject: CDI overlay

[EXTERNAL EMAIL]

Planning Commissioners,

We are writing to oppose the expansion of the proposed CDI overlay zone outside of the existing community growth area. There are major concerns regarding the impact of data centers and their use of massive amounts of water and power. The industry can be detrimental to the quality of life on adjacent properties and in the surrounding rural communities. There is no reason to expand the area available to data centers when so many questions remain unanswered about the negative impacts.

We are opposed to the redrawing of the Rural Legacy Area and the Priority Preservation Area boundaries. Agriculture is the largest industry in Frederick County and the integrity of these programs is important to maintain the strength of the agriculture community. We have spent over 30 years building our family farm and dedicated our lives to leaving a legacy to the next generation. If the CDI overlay zone is allowed to destroy the preservation designated areas then our home and our future will suffer greatly.

Thank you.

Bernard and Kimberly Sweeney
Calico Farm

James, Karen

From: Nick Carrera <mjcarrera@comcast.net>
Sent: Sunday, July 20, 2025 9:50 PM
To: Planning Commission
Cc: Council Members; County Executive
Subject: Comments on the Overlay

[EXTERNAL EMAIL]

Planning Commission 7.23.25

Dear Planning Commissioners,

I'm Nick Carrera, 2602 scenic Thurston Rd, Frederick

I see the July 23rd agenda is again based on the 47-page document from last week, on the proposed Overlay. I note a few things that disturb me about maps in that document.

Please look at Map 11 on page 18 – Current Agricultural Preservation Areas. Note that all the Quantum property north of Manor Woods Rd. is in agricultural preservation, as are the two parcels owned by Don Pleasants. In my opinion, that represents a commitment by the county to uphold the intended preservation requested by citizens. Now look at Map 12 on page 19 – Proposed Agricultural Preservation Areas, and at Map 2 on page 6 – Proposed CDI Overlay Zone, Properties. All the Quantum parcels north of Manor Woods Rd. and Don Pleasants's two parcels are no longer proposed for agricultural preservation, but for inclusion in the CDI Overlay Zone. I am dismayed at this action by the county staff!

The county should uphold citizens' wishes for agricultural preservation of these properties, instead of proposing their inclusion in the Overlay. Quantum has this plausible argument in its favor: that they bought the land expecting to use it for data centers, and if the county intended to be firm in preserving some of that land in agricultural status it should have made that clear before the sale. It's hard to see how the present situation could have occurred if both sides had full knowledge and were acting in good faith at the time the property was sold.

I'll repeat the point I made before about the size of the Overlay, but with an important change this time. I had urged that the Overlay be identical to the existing Quantum property. I'll change it this way: The Overlay, for now, should be limited to the Quantum property south of Manor Woods Rd. This will give some breathing time to explore and settle this curious about-face by the county. County surely has its reasons, and citizens deserve to hear them and consider the merits of the change.

Thank you for your consideration of this issue.

James, Karen

From: Brian Sweeney <briansweeney8911@gmail.com>
Sent: Sunday, July 20, 2025 9:59 PM
To: Planning Commission
Subject: CDI Overlay

[EXTERNAL EMAIL]

Planning Commissioners,

Thank you again for asking the difficult questions and making an effort to best serve the interest of Frederick County. I am writing in opposition to expanding the CDI overlay outside of the existing growth area. I support protecting the Rural Legacy Area and Priority Preservation Area and strongly oppose the redrawing of their boundaries. The County Council's current legislation prohibits data centers in these areas so the Planning Commission should fulfill that promise to the citizens of Frederick County by restricting any expansion of the data centers. There are serious questions about the data center industry within the current growth area regarding the availability of resources and its compatibility with the rural communities. It is irresponsible to expand the area available for data centers especially at the expense of the agriculture industry and the quality of life of residents.

Keeping the overlay zone within the existing growth area provides an opportunity for the data center industry and for Frederick to realize potential benefits while protecting its citizens. The majority of the growth area has been zoned light or general industrial. If county staff, elected officials and the planning commission start selecting properties outside of the growth area there is no reasonable stopping point for the overlay zone. We have already heard members of the community arguing that if their neighbor is included then they need to be included. This is a result of the fact that the homes and properties at the edge of the overlay will diminish in value and quality of life will be negatively impacted. For most people their house and property is the largest investment of their life and with this planning decision that investment could be destroyed. How will you explain to some citizens that their investment is worth less than their neighbors? How will you explain that a corporation's investment by board members from outside of the state is worth more than our homes? Will the planning commission include preserved farms in the overlay and set the stage for Frederick County to be the first in the state to remove an easement from a preserved farm? The repercussions of this decision will be felt throughout our county and state. I strongly urge you to protect the integrity of preservation and acknowledge the importance of the investment that so many participating farmers have made in the future of agriculture. The CDI overlay needs to be contained within the current growth area to maintain the buffer that was previously established through thoughtful and responsible planning decisions expressed in a practical community growth area in harmony with the Rural Legacy Area and Priority Preservation Area.

Finally, as a member of the data center workgroup I want to express my disappointment that so much of our final report has been disregarded with this proposed map. As I've mentioned multiple times, our unanimous recommendation is to restrict data centers from Rural Legacy Areas, Priority Preservation Areas and Agricultural Preservation Areas. The workgroup agreed that it should be within a designated growth area. Additional siting considerations included protection of land that has a high percentage of prime soil classes I - III (a defining characteristic of the preservation areas), viewshed impact, impact to nearby fragile ecosystems/watersheds, proximity to schools, houses of worship and residential developments.

Last week there were two public comments regarding a 10,000 acre recommendation by the workgroup, which are completely false. I need to be clear that the workgroup had one member suggest this (who also made the public comment) and I ended that discussion by referencing its similarity to the amazon debacle. The workgroup never entertained serious discussion on the topic or a vote and to suggest it made the final report is deceitful and insulting. I take pride in the workgroup and stand behind the recommendations even if they are disregarded by our elected leaders.

Thank you,

Brian Sweeney
Calico Farm

James, Karen

From: Kristie Sweeney <kristiesweeney1@gmail.com>
Sent: Sunday, July 20, 2025 10:52 PM
To: Planning Commission
Subject: CDI overlay zone: Adamstown, Maryland

[EXTERNAL EMAIL]

Dear Members of the Frederick County Planning Commission,

I am writing to express my concern regarding the newly proposed Critical Digital Infrastructure (CDI) map and the potential implications for our Rural Legacy and Priority Preservation areas. The expansion of the proposed CDI overlay zone beyond the existing designated growth area would have lasting implications for the surrounding community, particularly the agricultural landscape. As someone who was raised on a farm within Adamstown, I have a personal commitment to the agricultural community and preservation of the rural space. These lands have been carefully protected for their agricultural value, ecological importance, and role in preserving the rural character of our community.

While I understand the need for economic development, the current existing growth area is more than sufficient and will meet the necessary needs without jeopardizing the surrounding farmland and rich agricultural industry unique to Frederick County. Expansion of the CDI overlay zone to the Rural Legacy and Priority Preservation areas would set a dangerous precedent, threaten high-quality farmland, and negatively affect residents living near and in these proposed zones. Please respect the boundaries of the existing growth area and protect our preservation zones. Our farms, community, and quality of life depend on it.

Thank you for taking the time to consider these concerns.

Kristie Sweeney

James, Karen

From: Derrick Zimmerman <zimmermand16@yahoo.com>
Sent: Sunday, July 20, 2025 11:11 PM
To: Planning Commission
Subject: Opposition to Proposed Expansion of CDI Overlay

[EXTERNAL EMAIL]

Derrick Zimmerman
14205 Hoovers Mill Rd
Rocky Ridge, MD 21778
zimmermand16@yahoo.com
240-315-4012

Dear Members of the Frederick County Council,

I am writing to express my strong opposition to the proposed expansion of the CDI overlay zone out of existing growth areas. As it sits now, there is almost 2,000 acres available for data center development. Expanding further would not only stress resources such as water and electric, but it could take away extremely fertile and productive agricultural land. Land lost to data centers will never be recovered. Expanding the zone could also effect the Rural Legacy Area, and Priority Preservation Area which would be detrimental to agriculture. Agriculture is a hard enough industry to be in, but fighting large corporation with nearly endless money is impossible. If you expand the overlay zone, the land WILL be used for data centers at some point. If there is anything that remotely allows one to be there, the industry will find a way to make it happen.

While I understand the economic appeal of data center development, I am deeply concerned about the long-term environmental, infrastructural, and community impacts such facilities impose. Data centers are among the most resource-intensive developments, requiring vast amounts of electricity and water. In a time of increasing climate instability and energy constraints, approving additional zones for such high-consumption facilities is shortsighted and unsustainable.

Moreover, data centers contribute little in terms of job creation relative to their environmental footprint. Their presence often leads to increased noise pollution, reduced air quality from backup generators, and strain on power grids—all of which diminish the quality of life for nearby residents.

I urge the Council to consider the broader implications of prioritizing data center growth over responsible, community-centered development. Instead, we should focus on land use strategies that promote economic diversity, environmental stewardship, and long-term resilience.

Please do not approve the proposed expansion. Our county deserves thoughtful planning that reflects the values and well-being of its residents—not the unchecked growth of an industry with disproportionate local costs.

Thank you for your attention to this matter.

Sincerely,
Derrick Zimmerman

James, Karen

From: Minnie Ricketts <ricketts.minnie@gmail.com>
Sent: Sunday, July 20, 2025 5:06 PM
To: Planning Commission
Subject: CDI

[EXTERNAL EMAIL]

Good afternoon,

My name is Maria Ricketts. I live at <1242 New Design Road> in Adamstown. I am writing today in hopes that you all would seriously consider not expanding out of the existing growth area. Also do not redraw the Rural Legacy area or the Priority Preservation area. This would be setting other precedents for our protected land. If you can just take it out of protection then what's the point of putting land in protection? We do not know how these data centers will run in our area. I think we should keep the growth area as it is until we see how data centers will treat our area. They take up a lot of resources like electricity and water. I feel like talking about expanding before we know anything is very premature. We can look around to neighboring states and see what has happened. Do we want to do the same thing to our beautiful land? Not to mention that that land is some of the most fertile land in Frederick County. We don't need to be in such a hurry. We should be patient and see what will happen. We have about 2000 acres to see before we should be worrying about more land. Let's not put the cart before the horse.

Thank you for your time.

Maria Ricketts

"So let's not get tired of doing what is good. At just the right time we will reap a harvest of blessing if we don't give up." Galatians 6:9

James, Karen

From: Sam Roop <samuelkroop@gmail.com>
Sent: Sunday, July 20, 2025 11:19 PM
To: Planning Commission
Cc: samuelkroop
Subject: Proposed CDI Overlay Map

[EXTERNAL EMAIL]

To: Frederick County Planning Commission

From: Sam Roop
8302 Ramsburg Rd
Thurmont, MD
21788

Hi, My name is Sam Roop, and a Farmer here in Frederick County, MD. I was raised in an agricultural farm family in a neighboring county for 26 years. I moved to Frederick County in 1986 with my wife and continued farm life on my wife's family farm.

In 1993, I began a job with an Agricultural Commerical Fertilizer Company in Frederick County. My job was to apply fertilizer to agriculture crops in all of Frederick County and adjoining counties such as Montgomery County in particular. My home base was Poolesville, MD where i traveled to every day until 2005. I would travel the roads; New Design Rd and Ballenger Creek Rd where i was amazed with the amount of farm land south of Frederick City all the way to the Monocacy and Potomac rivers. It impressed me so much because they were big fields, flat, and the corn, wheat and soybean fields were as far as I could see. It gave me a good feeling that agriculture was going to be around forever. And i was proud to have grown up in this industry, and knowing that i would be a farmer on my own someday. The reality of farming on my own was given to me on my wife's family farm in 2005. In the past 20 years i have worked hard everyday just like my peers. In that time, agriculture has been under many regulations, restrictions, along with drought and tough financial burdens to name a few.

I've been a active Frederick County Farm Bureau member for 45 years and a Board member for 16 years and have been faced with agricultural issues in our county that we have lobbied to save our industry for our farmers and our future generations. With these issues we have had lots of meetings with local government officials which we have a great working relationship with, but this comes with a cost to us, that we are already working 7 days a week and anywhere from 12 to 16 hours a days and some longer. As a board member of the Farm Bureau and Past President from 2020 until 2023 we have accomplished some really good things like: Agricultural Preservation; Rural Legacy; and Priority Preservation Areas to name a few.

To you all, the Planning Commission, you have the task of deciding whether to increase the CDI overlay zone out of the EXISTING growth area in an area where I used to drive to Poolesville everyday and see the beautiful landscape of crops being grown. I am speaking for myself as a Farmer to "please do not" redraw the Rural Legacy Area or the Priority Preservation Area to allow the expansion for more data centers. I would love to see our next generation of Farmers have the opportunity to farm just like i did.

I have attended many meeting to hear about some the impacts this could do to our county. Water is a big concern, especially with the amount of people moving to Frederick City and surrounding areas. Infrastructure would be a problem to. Right now infrastructure is way behind in areas where growth has sprawled.

Lastly, i ask that you do not redraw our Preserved Agriculture Areas to allow for more data centers. We need agriculture for food, fiber and water to feed the world! Thank you for your attention.

Sincerely, Sam Roop

Sent from my iPad

James, Karen

From: Karen Lazo <LazoFamily@comcast.net>
Sent: Sunday, July 20, 2025 11:21 PM
To: Planning Commission
Subject: NO to an expanded CDI Area!

[EXTERNAL EMAIL]

Hello, planning commission representatives. I was shocked to hear that the size of the Critical Digital Infrastructure has the possibility of being expanded. No no no!! Please do not allow this! We moved to Frederick County in part for its rural beauty and its strong agricultural community. We don't want our beautiful county to turn into another Ashburn with thousands of acres of concrete. Please keep our county as green as possible.

Thank-you for hearing our voices. Sincerely, The Lazo Family (Phil, Karen, Zack, Brett, Anastasia & Tetyana)

James, Karen

From: Jill Sullivan <jillsullivan99@gmail.com>
Sent: Monday, July 21, 2025 12:48 AM
To: Planning Commission
Subject: Enough is Enough with Data Centers

[EXTERNAL EMAIL]

Please do not expand the CDI beyond the Quantum property (formerly Eastalco). Adhere to the previously established rural legacy/priority preservation area rules. We don't know that we can support what's being built now. Don't impact Adamstown with these data centers that may or may not be long term. (Technology can change quickly.) What we do need, long-term, is agricultural areas.

Sincerely,
Jill Sullivan, Adamstown
301-503-5454

James, Karen

From: Lauren Bicknell <laurenabicknell@gmail.com>
Sent: Friday, July 18, 2025 11:29 PM
To: Planning Commission
Subject: Oppose CDI Expansion -- Preserve Priority Preservation Areas

[EXTERNAL EMAIL]

Dear Planning Commission Members,

I'm writing to implore you **not** to expand the Critical Digital Infrastructure Overlay Zone beyond the existing growth area.

The 2,000-acres within the growth area provides *plenty* of space for data center development. There is no need to push beyond that boundary—especially when doing so would sacrifice some of Frederick County's most fertile farmland.

These areas were set aside to protect agriculture and preserve our rural communities. Expanding the CDI zone would undermine those efforts and permanently damage our agricultural future.

Many residents of Frederick County choose to live here in part for the bucolic imagery of the farmlands, and a desire to live in a community that supports local farmers and the rural way of life. To needlessly sacrifice this fertile land would be in direct conflict with the wishes and desires of many Frederick County residents, who live here, instead of Northern Virginia or other more industrial regions, for a reason.

My children play amongst the corn stalks in the farmland behind my parents' house. They discover seeds and animal bones, and find magic in the treasures the land provides. Our children deserve a future that allows them this freedom to explore and connect with the natural world-- something that cannot be replicated by AI.

95% of farms in Frederick County are family farms, and to expand into this protected farmland is to steal an important, irreplaceable resource and future from all the county's children. From those who grow up set to inherit the family farm, to those who find joy in playing in the fields of one, to those who eat the food grown in this fertile soil, every Frederick child (and indeed, every Frederick resident) deserves the chance to live in a community that values sustainability and the preservation of its agricultural heritage. When we protect farmland, we protect clean air, fresh food, open spaces, and a way of life that connects us to the land, and to each other.

Please, protect Frederick County's farmland and keep the CDI overlay zone within its current limits.

Sincerely,

Lauren Bicknell

--
Lauren Bicknell
Canisius College, M.S. Class of 2014

University of Virginia, B.A. 2012

James, Karen

From: Rebecca Wolfe <rmwolfe11@gmail.com>
Sent: Monday, July 21, 2025 7:42 AM
To: Planning Commission
Subject: Data center expansion

[EXTERNAL EMAIL]

Dear Frederick County Planning Commission,

I am writing to express my strong opposition to the proposed expansion of the data center in our county. I live in Adamstown, so this will also impact me.

I am deeply concerned about the strain such a facility would place on our local water and electricity resources. These vital services are already under pressure, and further demand could impact residents and future growth in more sustainable directions.

Additionally, the continued development of large-scale infrastructure threatens the agricultural heritage and historical character that make Frederick County unique. Preserving this identity is essential not only for current residents, but for future generations who deserve to experience the county's charm and rural legacy.

Thank you for your consideration.

Sincerely

Rebecca Wolfe

James, Karen

From: dboyer1 <dboyer1@comcast.net>
Sent: Monday, July 21, 2025 7:47 AM
To: Planning Commission
Subject: No expansion for Quantum Loop

[EXTERNAL EMAIL]

Dear sir or madam,

It is my understanding there is potential for an expansion to the data center project/Quantum Loop. Please do not approve this expansion. As a citizen of Adamstown, I have major concerns of the impact the expansion of data centers would have to our community and Frederick County as a whole. It is not just about losing farmland. I realize that land in our area will eventually be developed at the very least to homes. My biggest concern is the effect the data centers have on water usage. The significant stress this could have on our water supply for the county could be devastating. Please reject any requests to expand the project past its current area that is in development

Thank you,
Donna Cramer

Sent from my Verizon, Samsung Galaxy smartphone

James, Karen

From: K Feys <ksfeys@gmail.com>
Sent: Monday, July 21, 2025 7:56 AM
To: Planning Commission
Subject: Adamstown residents NOT for CDI expansion

[EXTERNAL EMAIL]

Dear Ladies and Gentlemen,

As a residential home owner in Adamstown, I respectfully ask you not to approve any more expansion for the Quantum property area, please Do Not approve any more expansion out of the Existing area. Also, please DO NOT expand the CDI zone. Do Not redraw the Rural Legacy Area or the Priority Preservation Area to allow the expansion of the existing growth area/CDI zone.

Our beautiful, wonderful and very vibrant green community will pay the price for all that is happening and be irrevocably changed by it in a negative way.

As a resident I am asking for no more expansion to be approved or redrawing of legacy and priority preservation area.

Thank you.

Kimberley Feys
2827 Haddington Court
Adamstown, MD 21710

James, Karen

From: Copper Penny Farm <copperpennfarm@gmail.com>
Sent: Monday, July 21, 2025 8:41 AM
To: Planning Commission
Subject: Adamstown CDI

[EXTERNAL EMAIL]

Good morning. I am writing to you today to express my concern about the proposed CDI Overlay Zone in my town. My husband and I moved our family and our farm from Anne Arundel County to Adamstown six years ago. Our farm raises cattle, sheep and pigs on pasture and we sell our pork, beef and lamb directly to the public from our farm store, by delivery, and at area farmers markets. We chose to move to Adamstown in no small part because of the excellent soil and support of the farming community in this Rural Legacy area.

When we farmed in Anne Arundel County, we watched the development increase. Traffic got worse, to the point where it became difficult to even turn out of our driveway during rush hour. We watched the night sky become brighter and brighter, as Arundel Mills Mall became a hot spot for the casino crowd. We chose to move to Frederick County because we wanted to live in a county that had excellent land and that was supportive of its farm culture. We wanted to live somewhere where we KNEW we would not be encroached upon again. Yet here we are.

We are dismayed by the attempts of the county to turn our farming community into a data center community. Why would you consider allowing our most valuable farming areas to become industrial? As I understand it, the current data centers at the old Alcoa site have not even been filled, and the power and water situation have not yet been resolved properly for that site. Why would you add more? We understand first hand the lure of the dollar, and that there are property owners who want to make a profit from this. In fact, we happen to own the land across the Doubs substation, and since living here have been inundated with dozens if not hundreds of offers from solar and other power companies to lease or buy our land for their own profit-making purposes. We get it. We also understand that there is something more important than the almighty dollar. We get one chance with our land. Let's not let the lure of the dollar now ruin the chance for all future generations. Please, please, please, for the sake of us, our neighbors, and the future generations, do not allow this CDI overlay to take away our farmland.

Sincerely,

Nancy Gardetto

--
[Shop Now!](#)

Nancy and Chuck Gardetto
Copper Penny Farm

www.copperpennyfarm.net

<https://www.facebook.com/CopperPennyFarm/>

James, Karen

From: Denny Remsburg <dremsburg52@gmail.com>
Sent: Monday, July 21, 2025 9:46 AM
To: Planning Commission
Subject: CDI Overlay

[EXTERNAL EMAIL]

Our agriculture community is very concerned about the proposed overlay zoning proposal for CDI. I share those concerns. While this proposal seeks to limit the size of the CDI industry in the county to a specified size (a good thing in my opinion), the area proposed under the redrawn maps impacts the Rural Legacy and Priority Preservation Areas that currently exist. These areas were created with the purpose of preserving high quality soils and farmland from development and keeping agriculture on the most productive lands in the county.

Redrawing the overlay map will infringe upon this preservation and have a permanent effect of the future of ag in the county. Once this land is taken out of production and covered with buildings, it will be gone forever. Replacing this with 5-to-1 or 10-to-1 acres of preserve ag land in another part of the county ignores the trade off of high quality, productive soils for land of lesser quality and value. This is some of the most productive land in the county and should remain in the Rural Legacy and Priority Preservation designation.

Keep the overlay zoning in already designated Growth Areas. Redrawing the maps will set a dangerous precedent for future re-zoning issues involving our ag land base. Simply trading land is NOT the answer. These areas were created for a reason and the county benefits from them in a multitude of ways including helping to provide funding for the County's Ag Preservation programs through the ag transfer tax. Removing these designations will have a ripple effect on ag in the county that could be catastrophic in future years.

Thank you for considering these comments.

--
Denny Remsburg

James, Karen

From: jx2h25@comcast.net
Sent: Monday, July 21, 2025 9:45 AM
To: Planning Commission
Subject: CDI Overlay Proposal

[EXTERNAL EMAIL]

To: Planning Commission Members

The County Executive and Council have jointly decided to locate Data Centers (DC) in the area north of Adamstown. The proposed Overlay accomplishes this by adding approximately 300 acres to the Eastalco campus which is about 60% of the <1% cap set by them. After listening to the recent Planning Commission regarding the location of DCs I still offer the following suggestion. If DCs turn out to be a welcome business from a tax and employment perspective, it makes sense that the two remaining farms (about 250 acres combined— this assumes the property owned by Argos, owner of the adjoining quarry, is not interested) between Ballenger Creek Pike and New Design Rd should be added to the Overlay at this time, which would prevent going through this laborious and time – consuming process later. Such a requirement may discourage any DC interested in expanding from locating Frederick County. If the DCs are not found to be a welcome enterprise, then the County has the power to not approve any additional DC from locating in Frederick County.

Sincerely,

Tom Horman
5649 Horman Lane
Frederick, MD 21703

James, Karen

From: Steve Black <steveblack2313@gmail.com>
Sent: Monday, July 21, 2025 11:10 AM
To: Planning Commission
Cc: Council Members; County Executive
Subject: A letter from Sugarloaf Alliance regarding the proposed CDI Overlay map
Attachments: SAlettertoPC072125CDImap.pdf

[EXTERNAL EMAIL]

Please find attached a letter from Sugarloaf Alliance regarding the CDI Overlay map now before the Planning Commission.

If you have any questions or would like to further discuss the substance of this letter please don't hesitate to contact the Alliance.

Thank you for your attention to our comments,

Steve Black
Sugarloaf Alliance



July 21, 2025

Frederick County Planning Commission
Re: CDI Overlay Map

Planning Commissioners:

Frederick County has been grappling with data center policy publicly for more than four years, and behind closed doors with Amazon since 2019. The problematic aspects of data centers are by now well known. The Planning Commission continues to bear the burden of protecting residents and communities from the negative effects of data center industrial development.

For the reasons stated below we strongly suggest that the CDI Overlay map be drawn to match the existing Eastalco Growth Area. Using the current growth area is the best way to take a measured step forward for the data center industry while avoiding many of the policy conflicts associated with an enlarged overlay.

The amendment to Livable Frederick regarding development of the Eastalco Growth Area

Several of you were directly involved in the drafting and passage of the *Livable Frederick Master Plan* (LFMP) and you may recall the distress caused by the “New Town” at Eastalco. In 2019, following years of work, the LFMP was presented to the County Council for legislative action. Contained in the draft LFMP was a description of a proposed “new town” in the Eastalco area.

“New Town

A major focal point for new development is identified in the area surrounding the decommissioned “Eastalco” site. ... This area is currently the largest concentration of industrial land in the county. However, it presents significant potential for growth in the form of a transit oriented, mixed-use development “new town” that includes significant employment and industrial uses.”¹

Public opposition to this part of the draft LFMP was intense. As a direct result of numerous community letters and statements at an hours long public hearing, Council Members Donald, McKay, and Hagen crafted an amendment to LFMP to address the people’s concerns. All seven

¹ Council Member Donald (District 1), AMENDMENT 53 to Livable Frederick Master Plan. Introduction Date: August 27, 2019.

Council Members voiced support for the amendment, including the now County Executive and three current Council Members.² The amendment passed unanimously.

The intent of the legislators with this amendment is clear from the content of the meeting. We urge anyone unsure as to the reasons for the amendment or the Council's intent for future interpretation to watch the 40 minutes of discussion and the vote. The meeting can be viewed beginning at the 40:00 mark here:

https://frederick.granicus.com/MediaPlayer.php?view_id=10&clip_id=7041&meta_id=98510

Mr. Donald's amendment set out a wide range of studies and community engagements needed as part of any planning process for the future of the Eastalco Growth Area. The relevant part of *Livable Frederick* now reads:

“Eastalco Growth Area

“A continuing focal point for development is identified in the area surrounding the decommissioned “Eastalco” site ... *including, but not limited to, land holdings of the former Alcoa aluminum refinery* and production plant ... This area is currently the largest concentration of undeveloped land in the county zoned for general and/or light industrial development and presents a unique opportunity for future development.

“The opportunity for future development at points along this corridor – including the Eastalco site, South Frederick (13, 15), and Point of Rocks (16) – *will be assessed and considered carefully during the development of small area plans for each of these places. ...*

“For the Eastalco Growth Area, overarching development issues and opportunities would require a detailed assessment of the following elements as part of a future community planning effort, including:

- A community outreach component that will include *a citizens advisory group* or similar entity to ensure broad community engagement;
- A preservation component to include a review of historic sites and archaeological resources, viewsheds and cultural characteristics (identification, documentation, and preservation when appropriate), including special consideration of structures and sites associated with Charles Carroll of Carrollton Manor;
- *An infrastructure component that identifies the timing and funding of public facilities* (including roads and schools) necessary to support the efficient development of the designated growth area;

² Frederick County Council meeting August 27, 2019, at 40:00. See https://frederick.granicus.com/MediaPlayer.php?view_id=10&clip_id=7041&meta_id=98510

- *A comprehensive study to address MARC system access and expandability with input from Maryland Transit Authority, County Transit, and CSX;*
- A green infrastructure component that includes a detailed review of environmental systems and resources (hydrology, forests, habitat assessment), and that integrates the built environment to the natural edges, through the placement and programming of open space and additional preservation areas;
- *An agricultural preservation component that examines options to encourage preservation of the valuable farmland at the site, as well as in the surrounding Priority Preservation Area;*
- A thorough, transparent and open study of industrial site contamination and subsequent post-industrial remediation and monitoring efforts, in consultation with Maryland Department of the Environment and the Environmental Protection Agency;
- *An assessment of the potential land use mix, which could include business, retail, residential, industrial, agricultural, open space, recreational, and institutional uses, for the growth area, including physical design, neighborhood impacts, public facility adequacy, comparative analysis of alternate land use scenarios, unique opportunities to address countywide planning challenges, and development feasibility;*
- And finally, *a thorough examination of how this existing growth area fits into the larger planning context for Frederick County*, addressing countywide growth projections, current and future transportation challenges, and community efforts to plan effectively, consistently, and in a coordinated manner, for the Frederick County of tomorrow.”

(Livable Frederick Master Plan, September 3, 2019. pp 43-44. Emphasis added)

While some of the requirements of this part of *Livable Frederick* apply less to a new data center industrial zone than to a ‘new town’, the language on needed analysis and community engagement is as relevant today as it was in 2019. Every planning or zoning action undertaken by Frederick County makes reference to *Livable Frederick*. Even the ‘Critical Digital Infrastructure Overlay Zone’ staff report carries the *Livable Frederick* logo. Yet the information pack contains no reference to the Eastalco Growth Area section of LFMP (pages 43-44).

On June 15, 2022, during discussion of a future Eastalco area planning activity, staff told the Commission:

We “need to circle back as a county and look at the impacts and implications of the development that’s happening [at Eastalco] now because it was not anticipated in 2019. And it is at a scale and type of development that we were not thinking about in 2019. So we need to get back there to think about the existing communities that border the area. Is

it an area that is ultimately going to expand? How is it going to grow and evolve and change over time? So that's something that I think we need to put on our road map.”³

In 2019 with the draft LFMP, “what was ultimately agreed to is we called it a Growth Area and we kinda stripped away some of the qualifying language ... the details ... with the promise ... I think it's page 43, there's like a half a page ... that talks about what we need to do when we go back to [the Eastalco Growth Area] and reconsider it. But in the interim Quantum Loophole [happened]. That's why I think there's an imperative to act there and kind of take care of it. The [Livable Frederick Master] Plan makes promises to the community. It says it will be engaged in a community planning process, will anticipate what the impacts are of development and will work with the community. And we didn't get a chance to do that. And I think it's important that we do that.”

During the May 27, 2025, Council meeting on the Overlay, Council Member McKay, specifically called out the language in LFMP relative to master plan changes at the Eastalco Growth Area.

“In looking through this, the Comp Plan amendment process in particular, you know, there was specific language that was inserted into the Livable Frederick Master Plan about this area that includes a lot of requirements for how this kind of consideration and process would go and the things that we would need to do. So are you planning this consistent with that language, in LFMP? ... We're talking about now an overlay and not just the QL development, an overlay that could involve a lot more land. I strongly urge you to not give that language short shrift, because it created an expectation in that community of involvement and of transparency, of interaction. And I mean, I would start with, you know, listing those, you know, those elements and how they overlay into what would currently be the normal Comp Plan process in terms of outreach, and where do they differ, and see if you can find ways to bridge those differences, because that's what the people are expecting out of this.”⁴

To be clear, none of the Livable Frederick Master Plan requisite actions governing development of the Eastalco Growth Area or its expansion to surrounding lands have been undertaken. Put another way, the proposed CDI Overlay Map is fundamentally inconsistent with the Livable Frederick Master Plan.

The path forward

Given the clear language of LFMP regarding planning for the Eastalco Growth Area, and the equally clear, unanimous legislative intent of the County Council in 2019, there are only two real options for the Planning Commission.

³ Frederick County Planning Commission, June 15, 2022, at 3:03:10.

⁴ Frederick County Council meeting May 27, 2025, at 2:03:00.

Either the LFMP-required actions are initiated as soon as possible and the overlay map is paused to allow for additional study and community engagement, or the Commission requests that the County Executive begin the process of amending *Livable Frederick* to remove the requirements on pages 43 and 44. Simply rushing forward with a de facto Eastalco small area plan is both unnecessary and inflammatory.

A slight change of tactic offers a third option. If the CDI Overlay is applied to only the existing Eastalco Growth Area, there is no need to change the growth boundary and no need to comply with the requirements of LFMP. This approach also has the virtue of avoiding the policy conflicts with the county's long-held agricultural and land preservation programs.

The CDI Overlay map should define a single, compact and contiguous area within the existing Eastalco Growth Area.

The Eastalco Growth Area is the site of current data center construction. Almost all of this land is currently zoned industrial and is in the most appropriate area for data center development. We think allowing data center development to sprawl beyond the current growth area is needlessly problematic.

Thank you,

Sugarloaf Alliance

attachment: *Livable Frederick Master Plan*, pp 43-44

cc: Frederick County Council Members

Multi-Modal District:

The Rail Corridor

The Rail Corridor represents a concentration of growth within a development corridor in the southern portion of the county along the existing CSX/MARC rail line that runs from the Downtown Frederick Transit Center to Point of Rocks (Figure 3). Growth along the Rail Corridor will occur in the form new development and redevelopment in a transit-oriented, mixed-use fashion. The existing Monocacy MARC Station, located behind the Riverview Plaza on MD 355, provides an opportunity for such future development.

Eastalco Growth Area

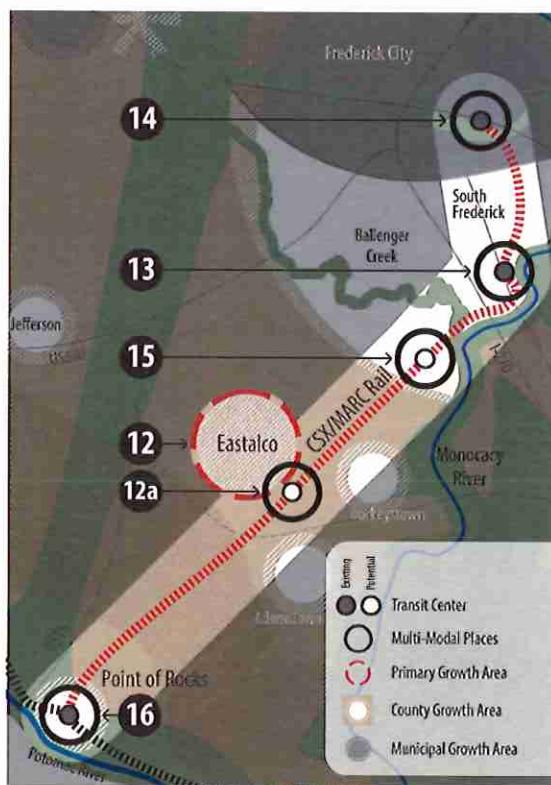
A continuing focal point for development is identified in the area surrounding the decommissioned "Eastalco" site (12) (identified as the Eastalco Employment Area in the 2010 plan, and including, but not limited to, land holdings of the former Alcoa aluminum refinery and production plant located along Manor Woods Road between New Design Road and Ballenger Creek Pike). This area is currently the largest concentration of undeveloped land in the county zoned for general and/or light industrial development and presents a unique opportunity for future development.

The opportunity for future development at points along this corridor – including the Eastalco site, South Frederick (13, 15), and Point of Rocks (16) – will be assessed and considered carefully during the development of small area plans for each of these places. While each small area plan will involve a study of those attributes and limitations unique to that growth area, many of the assessments will be similar in scope.

For the Eastalco Growth Area, overarching development issues and opportunities would require a detailed assessment of the following elements as part of a future community planning effort, including:

- A community outreach component that will include a citizens advisory group or similar entity to ensure broad community engagement;
- A preservation component to include a review of historic sites and archaeological resources, viewsheds and cultural characteristics (identification, documentation, and preservation when appropriate), including special consideration of structures and sites associated with Charles Carroll of Carrollton Manor;
- An infrastructure component that identifies the timing and funding of public facilities (including roads and schools) necessary to support the efficient development of the designated growth area;
- A comprehensive study to address MARC system access and expandability with input from Maryland Transit Authority, County Transit, and CSX;
- A green infrastructure component that includes a detailed review of environmental systems and resources (hydrology, forests, habitat assessment), and that integrates the built environment to the natural edges, through the placement and programming of open space and additional preservation areas;

Figure 3: The Rail Corridor



12) Eastalco Growth Area

12a) Multi-Modal Development Surrounding Potential New MARC Station

13) South Frederick Triangle Redevelopment and Multi-Modal Center

14) Downtown Frederick Transit Center (MARC and TransIT)

15) Potential Multi-Modal Development Within Ballenger Creek East

16) Potential Multi-Modal Development in Point of Rocks in Proximity to Train Station

Not shown: Brunswick City Multi-Modal Development

- An agricultural preservation component that examines options to encourage preservation of the valuable farmland at the site, as well as in the surrounding Priority Preservation Area;
- A thorough, transparent and open study of industrial site contamination and subsequent post-industrial remediation and monitoring efforts, in consultation with Maryland Department of the Environment and the Environmental Protection Agency;
- An assessment of the potential land use mix, which could include business, retail, residential, industrial, agricultural, open space, recreational, and institutional uses, for the growth area, including physical design, neighborhood impacts, public facility adequacy, comparative analysis of alternate land use scenarios, unique opportunities to address countywide planning challenges, and development feasibility;
- And finally, a thorough examination of how this existing growth area fits into the larger planning context for Frederick County, addressing countywide growth projections, current and future transportation challenges, and community efforts to plan effectively, consistently, and in a coordinated manner, for the Frederick County of tomorrow.

Monocacy MARC Station

A second focal point for growth is the South Frederick Triangle (or the 85/355 Corridor) (13), particularly the area surrounding the existing MARC station. This location represents another example of the best options for growing in a manner that preserves our rural land and that supports multi-modal accessibility. Its current incarnation as a suburban center for commercial retail and office belies its potential to be redeveloped in a more urban fashion, one that can create a new city-like environment, centered around the existing Monocacy MARC Station, and that includes residential development.

Few areas in the county are endowed with the degree of infrastructure investment that exists within the South Frederick Triangle. Yet the intensity of development is relatively minimal, constrained as it is by the emphasis on auto-centric design formats, among other factors. With proper planning, this area could become a vital urban environment that is on par with, yet distinct from, Downtown Frederick City.

Downtown Frederick Transit Center

The Downtown Frederick Transit Center (14) is located within Frederick City near the intersection of East Street and Patrick Street. It currently serves as a transit center for the county's Transit bus service and MARC commuter rail. Access to the Transit Station and MARC Stations, adjacent vacant land, adjacent underutilized land, and redevelopment potential mark the area of Frederick City surrounding the Downtown Frederick Transit Center as having high potential for transit oriented development.

South Ballenger Creek

The South Ballenger Creek area is located within the southern portion of the Ballenger Creek Community Growth Area. This land is characterized by low density industrial and employment development with some residential development to the north. Notably, the CSX/MARC Rail Line runs through this area. South Ballenger Creek may present opportunities for innovative forms of development, both transit-oriented and rail-oriented, that support multi-modal accessibility (15).

Brunswick

The Brunswick Community Growth Area is the largest growth area in the Brunswick Region. As a hub for the Baltimore and Ohio Railroad in the late 19th century and through the first half of the 20th century, the town flourished until railroad operations were reduced in the 1950's. Modern day Brunswick City functions as a commuter hub for Washington, D.C. The downtown area is designated a Main Street community with a growing mix of businesses and residential uses. With a combination of steeply sloping topography, direct adjacency to the Potomac River, active rail operations, and historic building stock, the City of Brunswick possesses a physical character and atmosphere that is decidedly unique in Frederick County.

Point of Rocks

Point of Rocks is an unincorporated community located along the Potomac River at the junction of MD 28 and US 15 (16). It contains some commercial, industrial, and retail uses. The majority of the community is composed of several major residential subdivisions. Most notably, the community contains an existing MARC Station.

James, Karen

From: Sepe <cjaarsepe@aol.com>
Sent: Monday, July 21, 2025 11:47 AM
To: Planning Commission
Subject: Fw: CDI - Growth area - Amendment of the Livable Frederick Comprehensive Plan

[EXTERNAL EMAIL]

Sorry wrong email address below - Getting used to being a regular citizen.

Best

Carole Jaar Sepe, MA
cjaarsepe@aol.com
301-606-3382

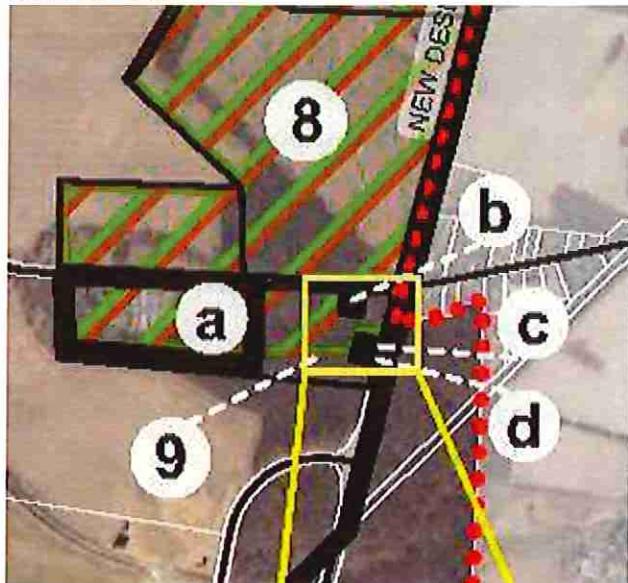
----- Forwarded Message -----

From: Sepe <cjaarsepe@aol.com>
To: planningcommission@frederickcounty.gov <planningcommission@frederickcounty.gov>; Kimberly Gaines <kgaines@frederickcountymd.gov>; Karen James <kjames@frederickcountymd.gov>
Sent: Monday, July 21, 2025 at 11:43:00 AM EDT
Subject: CDI - Growth area - Amendment of the Livable Frederick Comprehensive Plan

Planning Commissioner

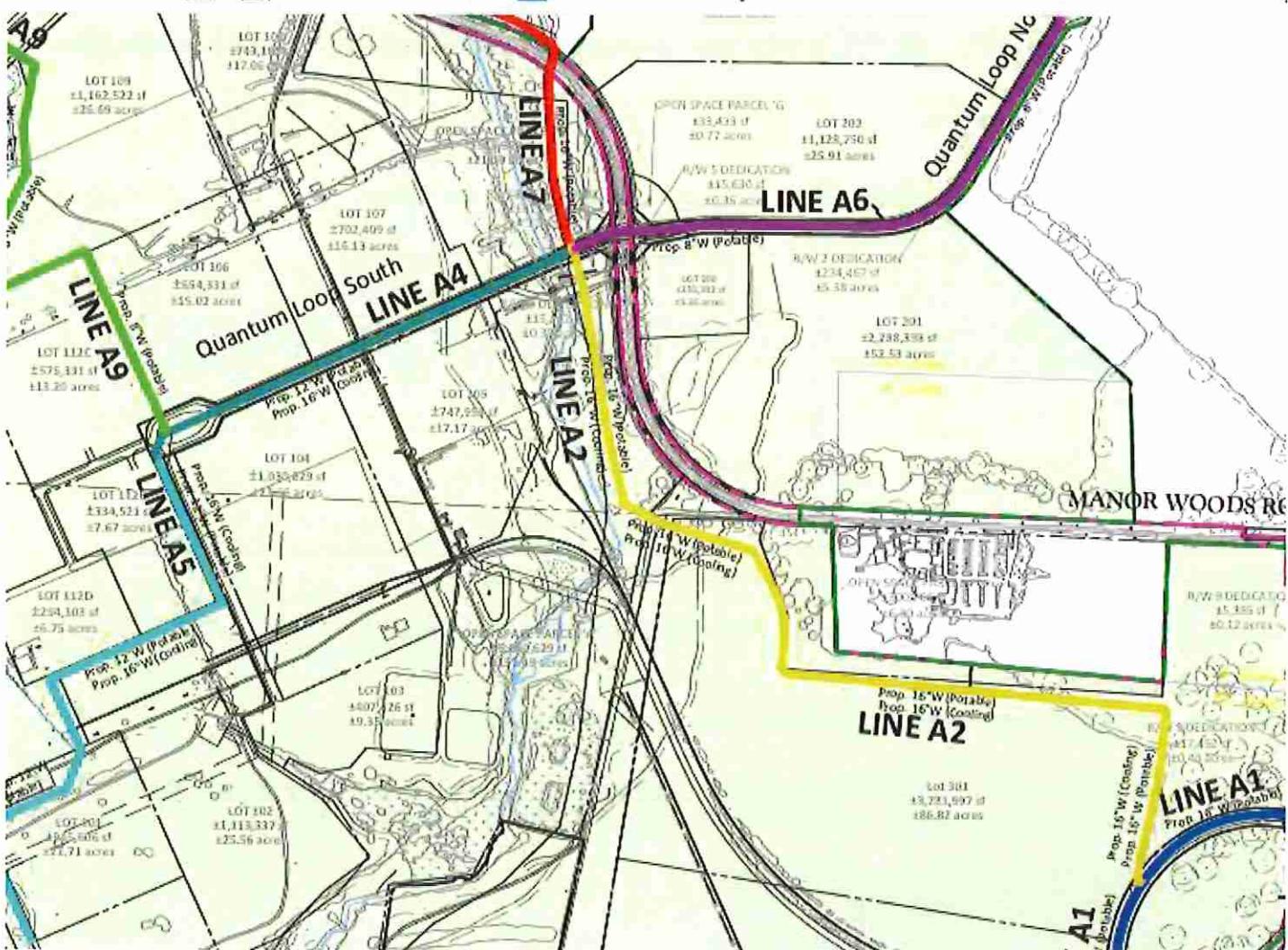
Mr. Tim Davis Chair and members of the Planning Commission:

This is a letter of support to include St Joseph Catholic Church in the Eastalco growth area (shown as Parcel a in the growth area). As the former chair of Building Committee through 2017, I welcome this addition.



A- Water/Sewer Classification

St Joseph has for several years now discussed hooking up to public water and sewer and unable to do so because it is not currently in the growth area. Although the proposed lines in yellow on the approved WS phasing plan for Quantum runs adjacent to St Joes parcel. The church parcel should be included in the growth area as recommended by staff as it will be surrounded by proposed GI and LI zoning.



Frederick County Water & Sewerage Plan – Approved – April 28, 2025 notes the following Service to a Property Zoned Agricultural

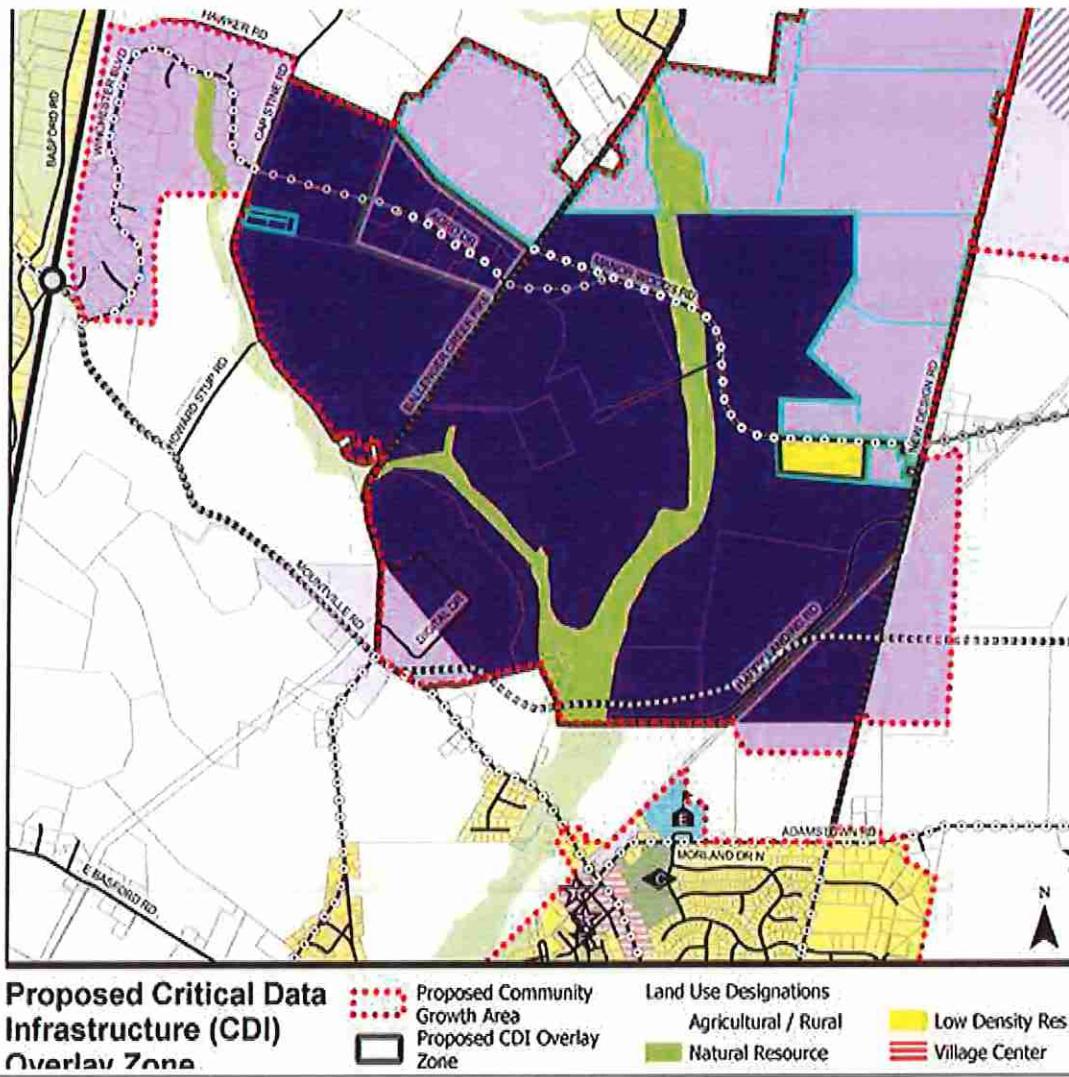
Agricultural zoned properties may apply for reclassification to allow connection to publicly owned community water and sewer service if at least one of the following conditions listed in (a), (b), (c), or (d) below are met:

- The property is within a Community Growth Area**, in an area planned for publicly owned community water and sewer service on the Comprehensive Plan and;
 - Adequate capacity exists in lines and/or treatment facilities; and
 - Service is restricted to uses allowed in the Agricultural zone.
- The property designation on the Comprehensive Plan is a category other than Agricultural/Rural or Natural Resource**; and
 - Adequate capacity exists in lines and/or treatment facilities; and
 - Service is restricted to uses allowed in the Agricultural zone.

B- ZONING : Agricultural Proposed

I am hoping for a compromise that the church can remain agricultural as currently proposed by staff but with an institutional designated use. As I understand it from Ms Gaines, the interpretation was that

"institutional" uses would not allow the church to hook up to water and sewer, however I disagree. I have discussed this with Ms Gaines ([see email below from 7/17/25](#)) and it is my understanding during the Livable Frederick discussions that private institutional properties were also to be included in the "Institutional" uses. This change to include private institutions was specifically requested while I was on the planning commission, although only a few of you may have been present.



C- LAND USE designation: Proposed LDR - Please Consider Institutional

I do understand the concern that several have testified to, that the residential land use will undermine the proposed CDI plan and as a citizen who understands the importance of the CDI infrastructure to the county, I agree; as currently proposed the bill notes that CDI cannot be established on parcels that are within 200ft of a residential zone or residential use parcel. Approving St Joseph as a low-density residential use may in effect actually have a negative impact on currently approved adjacent CDI subdivision plans, especially if the distance to residential use property boundary is approved to 500 feet. Lot 301 adjacent to St Joes and proposed LI lot across from Manor Woods Rd would not be able to be developed as a CDI lot.

As proposed the ordinance 1-19-8.402 (B) will revise distance from 200 ft to 500 ft.

(f) c) ~~Notwithstanding subsection (d),~~ Critical Digital Infrastructure may only be established on a tract of land that abuts land that is zoned Residential or is designated Residential on the Comprehensive Plan Land Use map ~~so long as~~ if the front, side, and rear yard setbacks set forth in section 1-19-6.100 for a Critical Digital Infrastructure facility are increased to ~~200~~500 feet from any property line abutting such Residentially zoned or Designated land.

As a side note:

I am hoping there will be a compromised from the council to clarify the residential and institutional uses (to include summer camps at St Joes) in the proposed bill of the zoning ordinance, which you reviewed a few weeks ago.

Thank you again for your time and consideration. I know you will be reading this. 

Carole Jaar Sepe, MA
cjaarsepe@aol.com
301-606-3382
4465 Lewis Mill Ct
Jefferson, MD 21755

On Thursday, July 17, 2025 at 12:19:36 PM EDT, Sepe <cjaarsepe@aol.com> wrote:

Kimberly

Thank you for the discussion this morning reference St Joseph. I definitely agree that St Joseph should be added to the growth area in order to be able to hook up to water and sewer.

As discussed, let me know what designation the county attorney believes is most appropriate. In my opinion the institutional zoning would make more sense than the residential land designation proposed LDR. The definition of LDR does not include any institutional land uses such as a church however the private Institutional uses are clearly noted in Livable Frederick as Institutional in my opinion; the church campus should be regarded similar to what is provided to Mt St Marys and St Elizabeth Ann Seton as well as New Life Christian on Jefferson Pike. These properties all have a church and an institutional designated use.

Livable Frederick Page 201

Low Density Residential This designation is only applied within growth areas and where public water/sewer is available or planned. The targeted density range is 3 – 6 dwellings (du)/acre to better support smart growth policies. This designation is applied to older developments within a growth area that may still rely on individual well/septic systems. Corresponding zoning districts include R-3, R-5 and PUD. The R-3 district permits single-family detached dwellings at a density of 3 du/acre with public water/sewer. The R-5 district permits single-family detached, duplexes, and townhouses at a density of 5 du/acre. The Planned Unit Development (PUD) zoning district is a floating zone that can only be applied to properties designated residential on the Comprehensive Plan Map. While the gross density of PUD developments is typically 3-4 du/acre, the net density is typically higher

The purpose of the Institutional designation is to identify public and governmental uses such as schools, libraries, public safety facilities, and water/sewer facilities. **This designation is applied to properties** owned either by the county or the Board of Education, even if they are undeveloped, **both private and governmental institutional uses** such as Mount St. Mary's University, the State's Victor Cullen Center, and the Daughters of Charity complex in Emmitsburg, **as well as to private** elementary and secondary schools. The corresponding zoning is Institutional (I), while some may be zoned residential and PUD.

Thank you again

Regards

Carole Jaar Sepe, MA
cjaarsepe@aol.com
301-606-3382
4465 Lewis Mill Ct
Jefferson, MD 21755

James, Karen

From: Bill Steigelmann <bsteig@aol.com>
Sent: Monday, July 21, 2025 12:49 PM
To: Planning Commission; Nick Carrera
Cc: Council Members; County Executive
Subject: Re: Comments on the Overlay

[EXTERNAL EMAIL]

Nick,

Excellent points WRT the maps!

I'm also a bit bothered that the County includes the small slice of land on the east-side of New Design Road (NDR):

1. It would be "neater" if NDR were the eastern-most limit of data centers.
2. The property is heavily wooded, and provides a wildlife refuge. I thought the County didn't allow clear-cutting all the trees on a property.
3. It is distant (with both NDR and the RR tracks between them).
4. Farms and residential properties are directly below the property along NDR.

Bill

On Sunday, July 20, 2025 at 09:50:20 PM EDT, Nick Carrera <mjcarrera@comcast.net> wrote:

Planning Commission 7.23.25

Dear Planning Commissioners,

I'm Nick Carrera, 2602 scenic Thurston Rd, Frederick

I see the July 23rd agenda is again based on the 47-page document from last week, on the proposed Overlay. I note a few things that disturb me about maps in that document.

Please look at Map 11 on page 18 – Current Agricultural Preservation Areas. Note that all the Quantum property north of Manor Woods Rd. is in agricultural preservation, as are the two parcels owned by Don Pleasants. In my opinion, that represents a commitment by the county to uphold the intended preservation requested by citizens. Now look at Map 12 on page 19 – Proposed Agricultural Preservation Areas, and at Map 2 on page 6 – Proposed CDI Overlay Zone, Properties. All the Quantum parcels north of Manor Woods Rd. and Don Pleasants's two parcels are no longer proposed for agricultural preservation, but for inclusion in the CDI Overlay Zone. I am dismayed at this action by the county staff!

The county should uphold citizens' wishes for agricultural preservation of these properties, instead of proposing their inclusion in the Overlay. Quantum has this plausible argument in its favor: that they bought the land expecting to use it for data centers, and if the county intended to be firm in preserving some of that land in agricultural status it should have

made that clear before the sale. It's hard to see how the present situation could have occurred if both sides had full knowledge and were acting in good faith at the time the property was sold.

I'll repeat the point I made before about the size of the Overlay, but with an important change this time. I had urged that the Overlay be identical to the existing Quantum property. I'll change it this way: The Overlay, for now, should be limited to the Quantum property south of Manor Woods Rd. This will give some breathing time to explore and settle this curious about-face by the county. County surely has its reasons, and citizens deserve to hear them and consider the merits of the change.

Thank you for your consideration of this issue.

From: Theresa Furnari <tafurnari10@gmail.com>
Sent: Monday, July 21, 2025 12:50 PM
To: Planning Commission
Subject: Overlay Legislation

[EXTERNAL EMAIL]

Good Morning Commissioners: I submit this brief request for review when considering the latest proposal for approximately 2500 acres for the data center overlay proposal currently before the County Council. Although there are many reasons to limit the overlay to the current 1600 acres that are already zoned industrial around the former East Alco Site, I want to share with you an article from the New York Times about the effect of data center construction on water resources.

A recent NY Times article profiled a Georgia county's issues with water shortage after data centers were built there. Read it [here](#).

Many residents in Frederick County rely on wells for their residential use. But we can't rely on the accuracy of the data center developers when estimating the amount of water they will be consuming. And once the land has been irreparably changed and the buildings have been built, it is too late to find out that the area can not support the water consumption of the centers without affecting the use of the residents.

Thank you for your consideration of this very real concern.

Theresa Furnari
4210 Mountville Road
Jefferson, Maryland 21755

James, Karen

From: Kelsey Maslen <kelseymaslen@gmail.com>
Sent: Monday, July 21, 2025 1:24 PM
To: Planning Commission
Subject: Concern about CDI Overlay Zone for Data Centers

[EXTERNAL EMAIL]

Good afternoon,

I am writing today as a Frederick County citizen as well as a farmer concerned about the proposed overlay zone for data centers.

I understand the need for creating an overlay zone for the data center, but I am concerned about the size and breadth, particularly as it relates to priority preservation areas. To me, it makes absolute sense to make use of the existing Eastalcoa area and repurpose for a more modern usage. However, expanding this into the Rural Legacy and Priority Preservation areas, undermines the intent of the established programs and sets dangerous precedents for future development in our county. As this discussion takes place, it also seems like there is not enough focus on the power and water needs of these data centers as well. The Maryland Piedmont Reliability Project is another related issue that demonstrates the impact of the power for these projects.

While I do not farm in Adamstown, my farm could be subject to powerlines in the future based on the pace of development of data centers and the burgeoning power needs they represent. As I operate my business on a preserved farm, the proposed overlay makes me question how my easement may be viewed in the future and what this represents for my business and any future generations wishing to farm.

Adamstown, Buckeystown and Carroll Manor are absolutely beautiful areas of Frederick County. It saddens me to think it could soon look like Loudoun County, a mass of highways and drab data centers, when this is still a very relevant farming and rural community in Frederick County. I encourage you to think long and hard about the policies to be put in place. Once farms exit agriculture for alternative purposes, they cannot be returned.

To summarize, while there is not an issue creating an overlay zone for the data centers, I do beseech you to:

Not Expand the overlay zone out of the Existing Growth Area
Not Redraw the Rural Legacy Area or Priority Preservation Area to allow expansion of the overlay zone

Thank you for your time. I encourage you to reach out to myself or others within the community to have further dialogue about these concerns.

Sincerely,
Kelsey Maslen

James, Karen

From: ShipeWeld <shipeweld@gmail.com>
Sent: Monday, July 21, 2025 1:32 PM
To: Planning Commission
Subject: Critical Digital Infrastructure zone map proposal for the Planning Commission

[EXTERNAL EMAIL]

To whom it may and should concern;

It is my understanding that the Frederick County Planning Commission is considering a proposed map for the Critical Digital Infrastructure (CDI) zone. It is my understanding that a CDI zone must be established for the continued approved development of the Eastalco Alcoa site to be transformed into a massive data center complex. The map also shows the CDI zone expanded beyond the Eastalco Alcoa perimeter. The proposal to implement this map results in changes that would expand data center development in Southern Frederick County. Let us be very clear: this began with a proposal to rezone the Eastalco Alcoa property in the Buckeystown/Adamstown area to allow for housing development. This site is over 2,000 acres. The outcry from our community surrounding the site regarding the impact a proposed 3-square mile housing development would have on the rural nature of the area, the environment, the lack of infrastructure, the known toxic waste area on the site EPA has said should never be disturbed, was emphatic. Many cited the growth plan that designates the development of industrial, commercial, or concentrated housing to the opposite side of Interstate 270. They voiced continued support to maintain the boundary of industrialization and urbanization that used to be the railroad tracks north of Buckeystown.

In the face of the strong opposition, the Eastalco Alcoa property owners proposed an alternative plan to sell the property for development into a data center complex. Alleviating some of the concern brought about by the original request to rezone the property to residential. The data center complex would have less impact on schools, roads, and traffic. The data center complex would operate continuously year-round but require few on-site employees and there was a promise of green space buffers and solar generating installations for the site as well. During hearings about the plan to rezone the Eastalco Alcoa site for the data center complex, repeated concerns raised about power and water demands for such a site were downplayed. It was far from the plan residents wanted. Most residents wanted the area preserved for continued agricultural use, as it had been used for decades, with a possible increase in recreational areas within the grounds. They noted that for decades a small portion, somewhere between 200 and 400 acres, of the site was used for industrial purposes and the remaining acreage farmed and used for recreational purposes. The plan to preserve it for farming and recreation was not to be and the plan to allow for a data center complex on the Eastalco Alcoa site was approved by the Frederick Council. Alcoa sold the site in 2021 for \$100 million cash to Quantum Loophole. That amount was half or even less than half the amount of money Eastalco could have made if the site had been zoned residential and yet, considerably more than if they sold it for farmland. Eastalco touts it as “a story of economic and environmental sustainability, taking a former industrial site through the remediation process and

bringing it forward for a new industrial use." Those of us who live here saw it as a slightly lesser evil than the poison pill of a massive development containing houses, townhouses, condominiums, and shops originally proposed.

Since the construction of the data center complex began on the Eastalco Alcoa site, there have been at least two sides to this story. One where State politicians and apparently the Council consider it a win and a boon for Maryland and our area. The other reality fraught with numerous environmental violations resulting in work stoppages and investigations and charges of wrongdoing by Quantum Loophole (formerly responsible for the site development and fiber installation throughout the southern end of the county and under the Potomac River). The track record of those who have taken over the construction project is not known to me currently.

Since before the groundbreaking for the Eastalco Acloa data center complex, the vultures have been circling - real estate speculators have been purchasing farmland or offering and soliciting farmland owners whose property adjoins or is in the area near the complex at unheard of prices. Some farmland owners are hoping to cash in, and others are feeling the pressure from that potential encroachment. As you know, we have had meetings where speculators and farmland holders requested rezoning because their property is near or adjoining Eastalco Alcoa. The people of our community came out time and again and said NO to rezoning those properties for industrial use and YES to maintaining agriculture zoning. At the time rezoning was not granted. We, the people of this rural community, knew that would not be the end of it. Because the precedents exist in Frederick County that if a landowner wants rezoning and they push and push the right buttons at the right time and long enough, rezoning can and does happen. It might take years, but eventually it can happen. Land in agricultural zones, not meant to have more than 1 house per 25-acres, gets rezoned and 14-acre plots have multiple houses or 25-acre plots can have 10 houses, and so on. The cascading events continue, and the rural balance further disrupted, while those holding onto land with plans to potentially do the same have their appetite further wet and are chomping at the bit for their turn before the cash cow runs dry.

The new proposal appears to be to expand data center rezoning beyond the Eastalco Alcoa boundaries that encompass over 3 square miles of some of the richest agriculture ground in Frederick. Further, it is proposed to appease those concerned about maintaining our rural heritage and open green spaces by committing to offering a ratio of 5-acres of farmland preservation for every 1-acre lost to data center development. It is not unlike those "tree planting credits" where developers can be granted permission to remove wooded areas provided, they commit to plant saplings or preserve woodlands somewhere else. That appears to be robbing Peter to pay Paul as the mature trees are lost from an area and even if saplings are planted in the same area, it is decades before the loss of mature trees is somewhat replaced, and if the saplings are planted elsewhere, the benefits of woodlands are forever lost from where they were removed. The land preservation proposal floated is inadequate and unacceptable to me. Where will that preserved farmland be? The agricultural preservation program efforts favor 50-acre tracts or larger and it is based on an application process. Although they will attest that they encourage all interested to apply and that they preserve smaller tracts, it is not common. How many such preserved small tracts are in Southern Frederick County? Preserved land in distant corners of Frederick County does nothing to preserve our rural community here in Southern Frederick. It is in this

Buckeystown/Adamstown area that green space and some of the best soil for farming is threatened and continue to be eroded away by owners pushing for rezoning to build houses or benefit from the data center complex wave. It drives up the prices for farmland beyond what an average farmer or new families wanting to farm can afford. We know of an instance where a person wanted to buy farmland near the site and applied for agricultural preservation to help offset the requested (overblown) purchase price.

Reportedly, their application for preservation enrollment was denied due to the proximity of that land to the Eastalco site. So, people are priced out and more farmland falls to greedy land brokers, real estate investors, and speculators who will and can afford to sit on it and bide their time until they can get their rezoning request approved. The farms and families on the borders of the data center complex and the CDI zone are forced to deal with the consequences. Seriously, will preserving 5-acres of farmland for every 1-acre devoted to data centers really mitigate the damage those sites cause? In my opinion, absolutely not.

I am vehemently opposed to this proposed expansion. Data centers should remain confined to the Eastalco Alcoa site. I realize the Governor and the Frederick Council are seeing dollar signs and think this is a fantastic moneymaker for Maryland and the County, with minimal effort on their part. If the State wants more data centers, put them in places where you need urban development. Feasibly there is money to be made from buildings that will not add to existing traffic problems in those areas. Such a plan would probably not be embraced by those living there either. Proposing such development in high population density areas might be met with large resistance due in part to the sheer number of people living there to mount a protest and those protests could not be ignored by the media what for their size alone. I doubt the idea of data centers are widely supported anywhere other than by those invested in and hoping to profit from them. We, in Southern Frederick County, may be a rural community without huge protesting crowds, but we are not blind to the politics and profiteering at play and will not sit silent. We do not want and will not roll over to allow you to expand the spread of this cancerous development. Data center development consumes enormous amounts of water and electricity and has not shown itself to be environmentally sustainable. Those original assurances to the contrary were placating falsehoods. Has there been a study completed on the impact of their consumption on the surrounding water table? Now, we face the proposal for new high-voltage transmission lines that will cross Maryland into Virginia -driven by data center energy demands. Some landowners will accept money for easements, and some will have that land taken by eminent domain. Many landowners will be negatively impacted and yet, others support it as a necessary means to feed the consumption needs of this ravenous beast.

Information technology has historically evolved rapidly, and the day may come when data center behemoths are obsolete. Not soon enough for those already suffering from the damage they inflict on areas across the country. Consider the issues in other states. Learn from their mistakes. I, for one, will not stand idly by and accept the fairytale being spun that data centers are good, that they represent progress, and will make Frederick and more so Maryland the envy of the other states in the country. Short term gains fade rapidly, and the problems caused will remain long term or irrevocably. The vultures circling to make a buck from land grabs should be run off like the vermin they are. Those holding farmland in the hope of striking it rich (or richer) should be shamed and shunned for their greed and told: NO not here. This is our rural community that we want to protect. This dalliance into the world of data centers must be contained within the borders of the Eastalco Alcoa site and that site alone. If the facts

and our actual experience show there is no harm done by the existence of the new data center complex on the Eastalco Alcoa site after it has been constructed, occupied, and running for a period of time, then discussion **with the community about the possibilities** of expansion should take place. **Not before.**

Sincerely,

Katherine Weld

Resident at
1215 Buckeystown Pike
Adamstown, MD

James, Karen

From: Elizabeth Bauer <ebenvision@gmail.com>
Sent: Monday, July 21, 2025 1:40 PM
To: Planning Commission
Subject: CDI Overlay Map

[EXTERNAL EMAIL]

Dear Frederick County Planning Commissioners,

I would like to first thank you for taking the time to consider the public comments. You are always very understanding and open to the thoughts and comments of the public and we appreciate it. This is a sharp contrast to our testimony at the County Council meetings where we feel brushed aside and ignored.

I testified at the County Council meeting on Tuesday, July 15, 2025, during the Public Comment period regarding the CDI Overlay Bill 25-09. Three minutes is never enough time to express how one feels or to share information. So, I am writing to you today as a follow up to my comments to make you aware of my concerns as you consider the Overlay Map.

During my comments at the County Council meeting on July 15th, I asked "How did we get here? Why are we even embarking on bringing data centers into Frederick County beyond what has already been approved?" I understand East Alcoa closed in 2010 and the land was a logical place for this type of development. I understand and appreciate that we want to decrease the residential tax burden (especially after receiving my most recent tax bill) by increasing business and industry revenue. I know this is an onerous task and I do not presume you, or the County Council, are taking this lightly. But I am very deeply concerned all of this is being rushed and there are so many questions no one seems to be able to answer and without the answers I fear no one can honestly make an informed decision. There is way too much at stake for the county and the state to make hasty decisions. I fear the County Council is relying much too heavily on the "industry" for the answers to many of these questions and we are putting too much faith in industry to be good neighbours. The county convened a Data Center Workgroup to understand the implications of allowing the industry into the County. Bill 25-05 ignored many of the recommendations of the Workgroup so what was the point of asking for the input from the Workgroup if they were going to be ignored? The only assumption I can make is because the industry did not agree with the recommendations.

What do I mean by too much industry influence?

During the discussion of the Knapp/Young Bill, we heard repeatedly, "industry standard" from Council Member Knapp and Bill 25-05 passed without digging deeper into the questions asked by so many during public comment. Amendments proposed that differed from the "industry standard," were not further considered. The Council moved forward with a Bill that allows for 75-foot data centers to be built within two hundred feet of a residential community which has been mentioned to be a specific request made by the developer, Donny Pleasants. Industry led Amendment #1, and the Council passed it.

On May 6, 2025, Council Member McKay proposed Amendment 12, Bill 25-05, which would have allowed for a complaint process for citizens if the noise levels from the data centers were to exceed specified levels. In my mind, this made perfect sense as this is an industry which is constantly evolving and is new to the County. However, it was voted down and believed that calling the Sheriff to resolve a complaint was enough. Industry will now “self-regulate”, and we are putting our faith in them to meet the noise level criteria loosely stipulated in Bill 25-05.

Now the County is embarking on a proposed Overlay plan which at face value sounds wonderful. The notion of adding five acres of preserved Ag land to offset one acre of land rezoned for data center development at the expense of the developer is wonderful until you explore in depth what this means, and the mechanics involved. The CE and the Developer would enter into a *Community Benefit Agreement* (“CBA”) prior to submitting a site plan application to the Planning Department. Per Ms. Venable, during the Planning Commission hearing on 7/9/2025, the Application and the CBA must be separated by a “firewall.” County Attorney, Kathy Mitchell, stated during the planning commission hearing that we would be “relying I guess on the good graces of the developers” to put money into the coffers. There can be no contractual guarantee because it would then become “Contract Zoning” or Quid Pro Quo. So, we are trusting the developers to carry through on the promise which is unenforceable.

And lastly, there has been no independent Cost Benefit Analysis conducted. Without this, how do we really know what we are going to receive in return for this investment? The only financial analysis we are aware of is the Sage Report which only looks at projected revenue and does not contain any information on costs. This is irresponsible at best.

We put our faith in Quantum Loophole and look at what we got. 80+ environmental violations later, sued and kicked off the project. If this is an example of what we can expect from the developers, I fear the outcome.

There are many additional concerns which are being brushed aside or ignored. Where is the electrical power going to come from to support this potential expansion? The County is an intervenor in the CPCN process at the PSC in the MPRP Project Application; is the County going to intervene in the CPCN Application process for any further transmission lines which will eventually be required to support the increased demand? When asked where the power is going to come from all we hear is, it is “not part of the siting ordinance.”

Where is the water going to come from to support the demand? Again, we are told is “not part of the siting ordinance. On July 14th, the NY Times published an article about Newton County, Georgia where Meta is developing a \$750 million data center and now the taps are running dry on houses relying on their wells. https://www.nytimes.com/2025/07/14/technology/meta-data-center-water.html?unlocked_article_code=1.Wk8.Cu-T.TJ2uqdMormGj&smid=url-share

“The situation has become so dire that Newton County is on track to be in a water deficit by 2030, according to a report last year. If the local water authority cannot upgrade its facilities, residents could be forced to ration water. In the next two years, water rates are set to increase 33 percent, more than the typical 2 percent annual increases, said Blair Northen, the mayor of Mansfield, a town in Newton County.”

"In the age of artificial intelligence, water has become as critical to data centers — which power the development of the cutting-edge technology — as electricity. The facilities pump enormous amounts of cold water into pipes that run throughout the buildings to cool the computers inside so that they can perform calculations and keep internet services like social networking humming.

A data center like Meta's, which was completed last year, typically guzzles around 500,000 gallons of water a day. New data centers built to train more powerful A.I. are set to be even thirstier, requiring millions of gallons of water a day, according to water permit applications reviewed by The New York Times."

When does the demand for power and water become a consideration? Aren't these critical criteria which should be taken into consideration prior to passing legislation?

In my mind, the data centers will be obsolete before they are even built. We are setting aside a huge portion of land in Frederick County for this one industry which may or may not ever be built because there is no guarantee there will be any power or water to support the industry. So, I ask again, why are we doing this? Why not slow this train down and take **all** factors into consideration so that you can make a thoroughly informed decision.

I strongly urge you to vote down the Overlay Map and stick to the current area around East Alcoa and not beyond. Let us see what occurs during the development of this site prior to allowing for expansion.

Thank you for taking the time to consider my comments and for the service you provide to the community.

Kind regards,

Elizabeth Bauer
8097 Geastlin Drive
Middletown, MD 21769-8434

James, Karen

From: Noel Williams <soultrain1966@gmail.com>
Sent: Monday, July 21, 2025 1:59 PM
To: Planning Commission
Subject: Adamstown MD CDI zone
Attachments: IMG_3416.jpg

[EXTERNAL EMAIL]

Dear members of the Frederick County Council,

I am writing on behalf of my mother, Virginia Wilbur who has lived at 4828 East Basford Rd most of her life and still does. She does not have the capacity to write a letter but we share the same concerns about increasing the data centers in southern Frederick County. My family sold the farm to Brian Sweeney a couple of years ago knowing that he would continue to farm the land as my father and his grandfather have done. Brian is a sterling farmer and we are proud of the work and care that he has put into our family farm.

My mother knows all of her neighbors, still votes and cares deeply about the area. Although I don't live with her I spend large chunks of time there and worry about the encroaching data centers. They have an impact on natural resources not to mention the noise that comes along with them. It is heart- breaking.

We don't have an issue with creating a CDI overlay zone for data centers. Please Do Not expand the CDI overlay zone out of the EXISTING growth area.

Please Do Not redraw the Rural Legacy Area or the Priority Preservation Area to allow the expansion of the existing growth area/CDI overlay zone.

Thank you for your time and attention to something that is important to my family.

Sincerely,
Noel Ann Wilbur-Williams and
Virginia Ann Wilbur

James, Karen

From: Annmarie Winkler <winklerah@yahoo.com>
Sent: Monday, July 21, 2025 4:08 PM
To: Planning Commission
Subject: Adamstown Data Centers

[EXTERNAL EMAIL]

To whom it may concern,

I am completely opposed to the data centers that are being built on the old East Alcoa site and possibly beyond. I can understand that the soil at the East Alcoa site is not desirable, but please do not expand the zone to go beyond the existing area.

While I also understand that data centers are crucial for our digital world, data centers have several significant drawbacks. 1) Data centers consume vast amounts of electricity putting stresses on our smaller, local power grid, to power servers, cooling systems, and other equipment. The electricity powering many of these data centers contributes to greenhouse gas emissions. 2) The constant operation of servers, cooling systems, and other equipment generates significant noise, affecting nearby neighborhoods in Adamstown. Noise levels can reach over 85 dBA, which can cause hearing damage with prolonged exposure. I am afraid over time the Adamstown communities near these large data centers will have health concerns related to noise pollution and air pollution caused by the backup generators etc. Noise pollution can cause sleep disturbances, headaches, and potentially cardiovascular risks. **Who should we contact when this happens?** Have you not heard the complaints these data centers are causing in Loudoun County? 3) Building these large data centers requires substantial land and will be taking away from the beautiful landscape that is Frederick County and the reason why most of us have chosen to live in this area. We had a family friend who recently visited us from New Zealand who commented on how lush and green the landscape was. When I told him that 'this will all be built on with data centers', he was SHOCKED!! What a waste of land. In the long run, I would sooner have housing built on it. At least you know what you're going to get!

Please do not redraw the rural legacy area or the priority preservation area to allow for added expansion of the existing growth area.

Adamstown Resident

James, Karen

From: KIMBERLY WHITLEY <ghog22@verizon.net>
Sent: Monday, July 21, 2025 4:44 PM
To: Planning Commission
Subject: Expanded CDI area, Adamstown

[EXTERNAL EMAIL]

Hello,

I have been a resident of Frederick County for 35 years and a resident of Adamstown for the last 20 years. We moved to Adamstown to enjoy the quiet more rural setting of Frederick and to escape all the excess of residential homes and apartments that were being built and are yet to be built. We plan to retire in our current and only home here as well, pending the outcome of this proposed expansion.

I have great concern for the expansion of the CDI area. The destruction of the agricultural land and Rural Legacy Area. The power and water supply to meet the demands of this monstrosity Data Center. The noise level of generators. The unnatural lit up sky from the mass lighting of this area. The decrease in home values, my home value that we have paid for, for the past 20 years! Frederick County is the largest land mass county in MD. We residents like it this way. We enjoy and purchased our home to have land around us that we thought would never be at risk for something like this. Although my kids are grown and out of the house, we still choose to live in Adamstown because of what drew us here in the first place. I'll bet that if this was in your backyard or community, you would feel exactly the same as we do; consider that.

I have been to the past meetings in hopes to have our voices heard. I was told that the bigger the turn-out and the more it's opposed, the better chance we would have at NOT expanding this out of the existing growth area. We have already compromised with the current 1500 acres. One gentleman who spoke at the meeting, and was opposed said, "I realize you will probably go ahead with this expansion and have probably already made up your minds". Please, hear us. Don't let this be a bunch of political propaganda and you're just going through the formality because you have to. You have the control and power to stop this. Listen to the people who matter, the residents and others who have said this is not what we want. Do not redraw the Rural Legacy Area, do not expand the CDI overlay zone out of the existing growth area. Please. I am pleading, please.

Sincerely,

Kim and Rick Whitley
5626 Haddington Dr., Adamstown

James, Karen

From: Madelle Tolbert <madgott@yahoo.com>
Sent: Monday, July 21, 2025 4:55 PM
To: Planning Commission
Subject: Overlay resend
Attachments: Madelle's county letter.pdf

[EXTERNAL EMAIL]

Hi!

Apparently the attachment I sent earlier was not readable. I am now sending it as a PDF. Sorry

Dear Member:

July 21, 2025

Decades ago I had to fight to keep my little three-and-a-half acres of paradise safe from quarries and other industries. I joined several dedicated volunteers who wanted to preserve our community's special sense of place.

After attending numerous planning and county meetings, we won and we were promised this serene section of the Monocacy Valley was to remain agricultural in long-term plans. So when the next election came, we knew exactly who to vote for. Now I find out that the county wants to allow the building of dozens of data centers on agricultural land very near me. The sites are extremely close to a town and completely surround my historic church.

The proposed industrial zoning overlay is perilously close to Carroll Manor Elementary school where my three daughters attended and where there is a special education preschool. I substituted for that program and taught in another one in the county. I know personally that some of these students often have severe health issues including compromised respiratory systems. In addition, it sits right on the edge of Adamstown and across the street from residential housing. It is unconscionable that the county would even consider doing such a thing on fertile agricultural land so close to a school with health compromised students as well as residences and two communities.

Let me tell you about this beautiful and bountiful place. Historically, much of this land belonged to Charles Carroll of Carrollton Manor who signed the Declaration of Independence. It consists of two small historic towns and contains several churches and a school. Most of the acreage is agricultural, mixed with residential and some industrial properties. It is a valley surrounded by gently rolling hills, Sugarloaf Mountain and Mar-Lu Ridge, as well as the Monocacy and Potomac Rivers.

I attended the presentation at my church that representatives of Quantum Loop gave concerning their plans for data centers located on Eastalco's property. I was impressed by their claims of being a good neighbor and environmentally conscious. I believed that this was a much better use than building houses on the plant's compromised soil. As soon as they started construction, Quantum Loop broke several ordinances and work had to be suspended! Now the current owners of the property are pushing for many more centers. How are residents in the area supposed to believe anything developers say or promise?

The county wants us to believe that because these thousands of acres might not be bought and used by data centers, or any number of other industries causing noise, pollution and dust; that they could just remain agricultural. Seriously?

So many reasons to not put this overlay here have been consistently stated at public hearings. But I want to stress how negatively it will affect your constituents who live here.

- Infrastructure

Experts have attested to how much water and electricity data centers consume. None of which the county possesses at this time. As a result, county residents will have to pay more for electricity and higher property taxes to finance new electrical plants, widen roads etc. Then you, as our county's leaders, will have to let in more development to pay the remaining debt. It is a vicious cycle that goes on and on.

One of the developers at a planning hearing intimated that data centers really don't use that much electricity any more because of improvements made. The council should require developers to show how much electrical power is consumed compared to data centers built in the past. They should also demonstrate how the centers will affect the area's water table, so wells in our community won't be affected.

There is also the increase in traffic. Our little two lane roads will absolutely not be able to handle the additional trucks and cars. Since construction started, there are more cars and trucks going 60 mph and over in our 40 mph zone. When I try to exit my driveway onto Ballenger Creek Pike, drivers speed around the curve and drive right up on my bumper.

- The Environment

We have bald eagles, owls, wild turkeys and a myriad of other birds on our property. There are deer, raccoons and rabbits. A family of foxes live in our tree line. No animal or human resident needs or wants our habitats impacted.

Off of New Design Road, the county allowed large warehouses to be built across the street from a development and next to a nursing home. The area there used to be the doorway to cooler temperatures, but not anymore. It just stays hot. Do you and want to be responsible, again, for contributing to higher temperatures? How will the noxious fumes coming from the diesel generators and trucks, impact constituent's and the environment's health?

Large data centers are notorious for loud noise generated by the exterior part of the cooling system. Often, the sound is above health and safety recommendations. People in other rural areas who live near them suffer from serious health problems and watch the value of their property plummet. Will our community members still be able to enjoy being outside to sit and savor the peace and beauty that brought us here?

- Agriculture

Years ago, a farmer explained to me how our area had the most fertile land in Frederick County. We have corn and soybeans in the field next to us, sheep across the street and horses on our other side. Besides wasting the best land in the county, I wonder how this project will effect not only people but livestock and farms as well. Preservation of open, productive green space is crucial for our county.

Planning staff members have put a lot of work into this overlay. There are maps and zoning lines galore. Apparently we have some good infrastructure for industry. But when I hear their presentations they never talk about the most important thing of all - your most important resource - people.

How will this huge overlay affect our peaceful community and the quality of life of citizens who live here? The planned data centers are large and intimidating with so many negatives. Despite any positives, this is absolutely not a good trade off for constituents and for this area.

I know you are good people who are trying to do your best. But we have already paid our dues when it comes to industry. Before you make any decisions on allowing data centers to be built, please read these articles from Time Magazine, the Massachusetts Institute of Technology and the Sierra Club about impact on communities:

<https://time.com/6982015/bitcoin-mining-texas-health>

<https://www.sierraclub.org/sierra/2024-3-fall/feature/big-data-centers-heres-what-happens-when-takes-over-small-town>

<https://thereader.mitpress.mit.edu/the-staggering-ecological-impacts-of-computation-and-the-cloud/>

The Time magazine article features Granbury, Texas where my sister lives. Even though she is several miles away she can hear the data centers daily. After reading these articles, can you in good conscience wish all of this upon residents and taxpayers in this area? I beseech you to deny this zoning change request. If you must allow data centers in our county, please find an area or areas where this does not affect the quality of life of so many citizens and communities.

Sincerely,

Madelle Gott Tolbert
4407 Ballenger Creek Pike
Frederick, MD 21702
301-639-6553

James, Karen

From: Charles Zitrick <charles.zitrick@gmail.com>
Sent: Monday, July 21, 2025 9:00 PM
To: Planning Commission
Subject: Meeting 8768, July 23, Agenda item 6

[EXTERNAL EMAIL]

Hello,

This is in regards to the data center overlay plan, agenda item #6. I am Charles Zitrick of 5600 Calvert Dr.

I request the Planning Commission to redraw the overlay maps, pulling back the plans to extend the data centers away overlay away from the Dover Dr. /Calvert dr. And Woodwinds act. Neighborhoods. Do not extend beyond the original planned borders of Eastalco until the current impact can be further studied and the impact on our communities is better understood.

Changing the overlay is giving the green light to corporations with no real interest in Frederick County. No community in Frederick County wants these data centers on their doorsteps. Redraw the maps now. Slow this impact. Once you change the overlay, there will be no going back. These data centers will over run our neighborhoods and surround us.

Charles Zitrick

Sent from my iPhone

From: Adamstown Resident <residentadamstown@gmail.com>
Sent: Monday, July 21, 2025 9:17 PM
To: Planning Commission; Cherney, Ragen; McKay, Steve; Young, Brad; Knapp, Renee; Carter, Mason; Donald, Jerry; Keegan-Ayer, MC; Duckett, Kavonte
Subject: Urgent Concerns Regarding the Proposed Expansion of the Critical Digital Infrastructure (CDI)

[EXTERNAL EMAIL]

To the Esteemed Members of the Frederick County Council,

Subject: Urgent Concerns Regarding the Proposed Expansion of the Critical Digital Infrastructure (CDI) Beyond the Quantum Property – A Threat to Adamstown and Frederick County's Future

We are writing to you today as deeply concerned residents of Adamstown and Frederick County to express our profound apprehension regarding the proposed expansion of the Critical Digital Infrastructure (CDI) beyond the existing Quantum (formerly Eastalco) property. We understand that the Planning Commission will be reviewing a proposed map early next week, and that their recommendation will likely carry significant weight with the County Council. We urge you to consider the long-term, detrimental impacts such an expansion would have on our community, our environment, and the very character of Frederick County.

The Quantum property, encompassing approximately 2,000 acres, is already designated within the county's growth area. It is vital to acknowledge that this land, despite its current industrial zoning, represents some of the most fertile agricultural land in Frederick County. Its conversion to data centers means a permanent loss of invaluable productive farmland, impacting our local food systems and agricultural heritage.

Our primary concern, however, lies with any proposal to expand the CDI beyond the boundaries of the Quantum property. Such an expansion would inevitably encroach upon areas that have been meticulously designated as **Rural Legacy Areas** and/or **Priority Preservation Areas**. These designations were established through careful planning and public input to protect our county's natural beauty, ecological diversity, and cherished rural character. Sacrificing these irreplaceable landscapes for industrial development would be a profound betrayal of the very principles of responsible land use and environmental stewardship that our county claims to uphold.

For the residents of Adamstown, the implications of such an expansion are particularly dire. Our community thrives on its rural setting, offering a quality of life that is increasingly rare. Expanding the CDI would lead to a multitude of negative impacts, directly affecting our daily lives and the long-term viability of our community:

- **Noise Pollution:** Data centers operate 24/7, requiring constant cooling. The massive industrial fans and backup generators produce a relentless, high-decibel hum that would permeate our quiet rural environment, disrupting peace and quiet, impacting sleep, and reducing the enjoyment of our homes and outdoor spaces. Construction noise would also be significant and prolonged.
- **Massive Water Consumption:** Data centers are voracious consumers of water for their cooling systems. Expanding the CDI would place an unsustainable demand on Frederick County's finite water resources. This increased demand could lead to water shortages, particularly during drought periods, impacting residential water supply, agricultural irrigation, and the health of local waterways. Loudoun County, for example, has seen its data centers'¹

potable water usage increase by 250% since 2021, consuming hundreds of millions of gallons annually.

- **Air Quality Degradation:** Beyond the dust and particulate matter from prolonged construction, the operation of backup diesel generators at data centers can release harmful pollutants into the air, including nitrogen oxides and fine particulate matter. This directly impacts air quality, posing potential health risks to residents, especially those with respiratory sensitivities. Concerns about cumulative air quality impacts from data centers are a significant issue in areas with high concentrations of these facilities.
- **Visual Pollution and Light Trespass:** The sheer scale of data center buildings, often resembling large, windowless boxes, is fundamentally incompatible with the rural aesthetic of Adamstown. Furthermore, the constant bright lighting required for security and operation, especially at night, would create significant light pollution, obscuring our night sky and intruding upon the privacy and tranquility of nearby homes.
- **Decreased Property Values and Demographic Shift:** The proximity of large-scale industrial data centers, with their associated noise, visual blight, traffic, and environmental concerns, will undeniably and significantly **decrease the home values** of Adamstown residents. Our homes are our most significant investments, and this expansion would directly undermine their worth. Adamstown is currently an upper-middle-class community, and a decline in property values, coupled with a diminished quality of life, will inevitably lead to these higher-income residents seeking more desirable locations. This exodus would transform our vibrant, upper-middle-class community into one with lower home values, resulting in **less tax revenue for Frederick County** as these higher-earning taxpayers leave.

We urge the County Council to learn from the cautionary tale unfolding in **Loudoun County, Virginia**, often referred to as "Data Center Alley," which hosts the world's largest concentration of data centers. Despite the significant tax revenue generated, Loudoun County residents and officials are now grappling with severe negative consequences:

- **Strain on Power Grid and Reliance on Fossil Fuels:** The explosive energy demand from data centers has placed an immense strain on Loudoun County's power grid, leading to concerns about the continued reliance on fossil fuel plants and the need for massive new transmission lines. This directly undermines climate goals and clean energy initiatives.
- **New Transmission Lines and Infrastructure:** To meet the insatiable power demands, new and expanded high-voltage transmission lines are being built, cutting through conserved lands, parks, and established neighborhoods, further industrializing once-rural areas and impacting residents' quality of life.
- **Environmental Degradation:** Beyond water and air quality issues, the sheer scale of data center development in Loudoun has led to concerns about widespread land consumption, increased stormwater runoff from vast impervious surfaces, and impacts on wildlife habitat.
- **Regret Over Siting Decisions:** Even Loudoun County officials have expressed regret, admitting that "if we had to do it over again, we would do it a little bit different. There's definitely instances where land has gotten too close to residential." This admission underscores the irreversible damage caused by unchecked expansion.

Furthermore, while the promise of job creation often accompanies such developments, it is crucial to examine the true economic impact on our local community. We observe that the majority of the construction workforce for these data centers often consists of individuals from lower-income housing areas of West Virginia or Pennsylvania. While we respect all workers, these are largely temporary construction jobs. The long-term, high-paying operational jobs within data centers are typically few and require specialized skills, often not filled by local residents. By expanding the CDI, the County Council would effectively be prioritizing transient, lower-wage construction jobs (whose earnings largely leave the county) over the preservation of our community's quality of life, which attracts and retains higher-income residents. These higher-income residents contribute significantly more to Frederick County's tax base through property taxes, local spending, and support for local businesses.

In essence, expanding the CDI risks driving away the very demographic that contributes most substantially and sustainably to Frederick County's economic vitality, in favor of a short-term, less impactful economic gain.

Beyond the direct impact on individual residents, the proposed CDI expansion poses severe negative ramifications for vital community institutions, such as **St. Joseph Church in Adamstown**. As a spiritual and communal anchor, St. Joseph Church would face:

- **Disruption of Worship and Contemplation:** Churches are sanctuaries of peace, reflection, and communal worship. The constant, pervasive hum from data center cooling systems and the loud, intermittent noise from backup generator testing would directly intrude upon religious services, prayer groups, and quiet moments of contemplation. This relentless industrial noise would make it incredibly difficult to maintain a sacred and serene environment, fundamentally undermining the purpose and atmosphere of the church.
- **Diminished Aesthetic and Spiritual Environment:** St. Joseph Church, like many rural churches, serves as a visual landmark and a symbol of community identity within a picturesque setting. Being surrounded by massive, industrial data center buildings would drastically alter the visual landscape, replacing natural beauty with industrial blight. Furthermore, the constant bright lighting required for security and operation, especially at night, would create significant light pollution, obscuring the night sky and intruding upon any evening church events or the peaceful ambiance that many find spiritually uplifting.
- **Impact on Community Gathering and Activities:** Increased heavy vehicle traffic during the prolonged construction phase, and ongoing operational traffic (e.g., fuel deliveries, maintenance crews), would make it more challenging and less pleasant for parishioners to access the church. This could deter attendance at regular services, religious education classes, community potlucks, and other vital church activities, impacting the vibrancy and participation of the congregation.
- **Erosion of Membership and Financial Stability:** As the community demographic shifts due to declining property values and the departure of higher-income residents, St. Joseph Church would face a shrinking membership base. This decline in active parishioners and financial contributions would directly threaten the church's ability to sustain its operations, ministries, and outreach programs, ultimately weakening its role as a community anchor and its capacity to serve those in need.

The County Council has a critical responsibility to safeguard the long-term well-being of its residents and the integrity of its natural and agricultural resources. We implore you to listen to the voices of the public and to **reject any proposal that seeks to expand the Critical Digital Infrastructure (CDI) beyond the existing Quantum property**. Prioritize the preservation of our rural legacy, our fertile farmlands, the health of our environment, and the cherished quality of life in communities like Adamstown. Do not sacrifice the long-term prosperity and well-being of your current, tax-contributing residents for short-sighted industrial expansion that will ultimately lead to lower home values and less overall revenue for Frederick County.

Thank you for your time and serious consideration of these vital matters.

Sincerely,
Elyse Wilson

Ken Stephens

2799 Decatur Drive

Adamstown, MD 21710

James, Karen

From: Elizabeth Lilik <elilik@comcast.net>
Sent: Monday, July 21, 2025 11:01 PM
To: Planning Commission
Cc: Cherney, Ragen; McKay, Steve; Carter, Mason; Donald, Jerry; Knapp, Renee; Keegan-Ayer, MC; Young, Brad; Duckett, Kavonte
Subject: Concerns Regarding Expansion of the CDI - Adamstown, MD

Importance: High

[EXTERNAL EMAIL]

Good Evening,

My name is Elizabeth Burkell and I'm a resident of Adamstown, MD. I have two children, ages 6 and 3, and have lived in Adamstown for the past eight years, having moved here from Germantown, MD.

You all have a very important review and recommendation for the proposed expansion of the CDI, beyond the existing Quantum Loophole property....one that will leave a lasting impact well after your tenure on the committee. With the decision in front of you...all the talk about rezoning...looking and maps, maps, and more maps,; all the emails, phone calls, and conversations with people for and against the expansion of the CDI, I implore you to please do your due diligence in visiting our little part of Frederick County. Take in the quaintness our area offers. The winding roads, the streams and creeks, the fields full of some of the richest soil in the entire state, the forests full of wildlife including Bald Eagles...and the most stunning sunsets you've ever seen. Please, come see why we're fighting so hard to keep it that way.

Decision makers need not look any further than over the state line to see the dismal impact datacenters have on communities like ours. Yes, the county will make money. There's no dispute. But you are not in your position for making money for the county. You are in your position to determine what the infrastructure in our county could do, should do, what it may, can, and should/shouldn't look like, and most importantly, analyze and use your knowledge and expertise in understanding the impacts. These impacts include:

- An increase in water consumption, directly affecting water supply for residents, and the irrigation farmers use for their crops. There was already an incident with Quantum polluting local waterways, with little repercussions from the State and County.
- Pollution including light, noise, and air. The datacenters use diesel generators for backup energy that they have to test frequently, causing issues with noise as well as harming the air quality.
- Decreasing property values. Having structures like these so very close to our neighborhoods and homes will drive our property values down significantly.

What can you do? Help us meet at a happy medium. With 2,000 acres already within the existing growth area that can be developed for datacenters, there is really no good need...other than true greed, to expand further right now, especially when we're not ready or prepared for the impacts all of this will have with the land already zoned for it, let alone additional zones. There isn't an issue with creating an overlay zone for the datacenters, but please, do not expand the zone out of the existing

growth area at this time. In addition, please do not redraw the rural legacy Area or the Priority Preservation Area to allow the expansion of the existing growth area and CDI overlay zone. Please.

Thank you for your time and consideration.

Regards,

Elizabeth Burkell

**P.S. For the council members copied on this email, please make Quantum and Co. slap a few hundred solar panels on their datacenters to compensate for all the energy they are and will be continuing to suck up. Keep your "1%" and extra tree plantings, and allow THAT to equate to additional revenue for the county while helping the environment and supporting the infrastructure.

James, Karen

From: Eric Aellen <eric@linganorewines.com>
Sent: Tuesday, July 22, 2025 6:47 AM
To: Planning Commission
Subject: Proposed CDI Overlay Map

[EXTERNAL EMAIL]

Frederick County Planning Commission, I'm writing to you this morning to discuss the proposed redrawing of the CDI Overlay map. I believe you should keep the CDI overlay in the current growth area. Expanding the area would potentially increase the footprint of data centers thus increasing the need for power and water. We are in the mist of fighting the MPRP powerlines, which I believe most of you have been opposed to, that are planned to cross through a large part of our county's farmland. Farmers in Frederick County continue to feel we are getting squeezed out of our livelihood as the demand for farmland continues to be swallowed up with expanded urban growth, stream buffers, data centers, power transmission line to name a few.

Please consider keeping the CDI overlay contained to the current growth area.

Thank You,

Eric Aellen (2nd generation Frederick County Farmer)
Linganore Winecellars
13601 Glissans Mill Rd
Mount Airy, MD 21771
240 793-8059

James, Karen

From: Glenn Winkler <gewinkler@yahoo.com>
Sent: Tuesday, July 22, 2025 10:44 AM
To: Planning Commission
Subject: data centers in Adamstown MD

[EXTERNAL EMAIL]

Good Morning Frederick County Council,

When Quantum first arrived, the community fought it as we believed it to just be a way to put a foot in the door. Yet those in charge allowed it and assured us that it would have a small impact. Either the community was lied to by those in charge, or they were wrong to think it was not just a stepping stone to force open the door and take over.

At the very least, I believe the decision to expand should wait till the current project is complete, and the impact of its construction and operation is more established. If the Quantum impact is very small as promised, then there will not be as much opposition to the expansion. But if the current project is full of negative impact then how much more devastating is approving expansion now going to be.

I am sure you have seen the letter below many times now, and even though it is a copy and paste, it does not mean any less. Please take into consideration all the points that the letter makes.

We have time to do this right, lets please get more impact data on the current project before approving the expansion.

Thanks for your time,
Glenn Winkler
Adamstown Md

To the Esteemed Members of the Frederick County Council,

Subject: Urgent Concerns Regarding the Proposed Expansion of the Critical Digital Infrastructure (CDI)

Beyond the Quantum Property – A Threat to Adamstown and Frederick County's Future

We are writing to you today as deeply concerned residents of Adamstown and Frederick County to express our profound apprehension regarding the proposed expansion of the Critical Digital Infrastructure (CDI) beyond the existing Quantum (formerly Eastalco) property. We understand that the Planning Commission will be reviewing a proposed map early next week, and that their recommendation will likely carry significant weight with the County Council. We urge you to consider the long-term, detrimental impacts such an expansion would have on our community, our environment, and the very character of Frederick County.

The Quantum property, encompassing approximately 2,000 acres, is already designated within the county's growth area. It is vital to acknowledge that this land, despite its current industrial zoning, represents some of the most fertile agricultural land in Frederick County. Its conversion to data centers means a permanent loss of invaluable productive farmland, impacting our local food systems and agricultural heritage.

Our primary concern, however, lies with any proposal to expand the CDI beyond the boundaries of the Quantum property. Such an expansion would inevitably encroach upon areas that have been meticulously designated as Rural Legacy Areas and/or Priority Preservation Areas. These designations were established

through careful planning and public input to protect our county's natural beauty, ecological diversity, and cherished rural character. Sacrificing these irreplaceable landscapes for industrial development would be a profound betrayal of the very principles of responsible land use and environmental stewardship that our county claims to uphold.

For the residents of Adamstown, the implications of such an expansion are particularly dire. Our community thrives on its rural setting, offering a quality of life that is increasingly rare. Expanding the CDI would lead to a multitude of negative impacts, directly affecting our daily lives and the long-term viability of our community:

Noise Pollution: Data centers operate 24/7, requiring constant cooling. The massive industrial fans and backup generators produce a relentless, high-decibel hum that would permeate our quiet rural environment, disrupting peace and quiet, impacting sleep, and reducing the enjoyment of our homes and outdoor spaces. Construction noise would also be significant and prolonged.

Massive Water Consumption: Data centers are voracious consumers of water for their cooling systems. Expanding the CDI would place an unsustainable demand on Frederick County's finite water resources. This increased demand could lead to water shortages, particularly during drought periods, impacting residential water supply, agricultural irrigation, and the health of local waterways. Loudoun County, for example, has seen its data centers' potable water usage increase by 250% since 2021, consuming hundreds of millions of gallons annually.

Air Quality Degradation: Beyond the dust and particulate matter from prolonged construction, the operation of backup diesel generators at data centers can release harmful pollutants into the air, including nitrogen oxides and fine particulate matter. This directly impacts air quality, posing potential health risks to residents, especially those with respiratory sensitivities. Concerns about cumulative air quality impacts from data centers are a significant issue in areas with high concentrations of these facilities.

Visual Pollution and Light Trespass: The sheer scale of data center buildings, often resembling large, windowless boxes, is fundamentally incompatible with the rural aesthetic of Adamstown. Furthermore, the constant bright lighting required for security and operation, especially at night, would create significant light pollution, obscuring our night sky and intruding upon the privacy and tranquility of nearby homes.

Decreased Property Values and Demographic Shift: The proximity of large-scale industrial data centers, with their associated noise, visual blight, traffic, and environmental concerns, will undeniably and significantly decrease the home values of Adamstown residents. Our homes are our most significant investments, and this expansion would directly undermine their worth. Adamstown is currently an upper-middle-class community, and a decline in property values, coupled with a diminished quality of life, will inevitably lead to these higher-income residents seeking more desirable locations. This exodus would transform our vibrant, upper-middle-class community into one with lower home values, resulting in less tax revenue for Frederick County as these higher-earning taxpayers leave.

We urge the County Council to learn from the cautionary tale unfolding in Loudoun County, Virginia, often referred to as "Data Center Alley," which hosts the world's largest concentration of data centers. Despite the significant tax revenue generated, Loudoun County residents and officials are now grappling with severe negative consequences:

Strain on Power Grid and Reliance on Fossil Fuels: The explosive energy demand from data centers has placed an immense strain on Loudoun County's power grid, leading to concerns about the continued reliance on fossil fuel plants and the need for massive new transmission lines. This directly undermines climate goals and clean energy initiatives.

New Transmission Lines and Infrastructure: To meet the insatiable power demands, new and expanded high-voltage transmission lines are being built, cutting through conserved lands, parks, and established neighborhoods, further industrializing once-rural areas and impacting residents' quality of life.

Environmental Degradation: Beyond water and air quality issues, the sheer scale of data center development in Loudoun has led to concerns about widespread land consumption, increased stormwater runoff from vast impervious surfaces, and impacts on wildlife habitat.

Regret Over Siting Decisions: Even Loudoun County officials have expressed regret, admitting that "if we had to do it over again, we would do it a little bit different. There's definitely instances where land has gotten too close to residential." This admission underscores the irreversible damage caused by unchecked expansion.

Furthermore, while the promise of job creation often accompanies such developments, it is crucial to examine the true economic impact on our local community. We observe that the majority of the construction workforce for these data centers often consists of individuals from lower-income housing areas of West Virginia or Pennsylvania. While we respect all workers, these are largely temporary construction jobs. The long-term, high-paying operational jobs within data centers are typically few and

require specialized skills, often not filled by local residents. By expanding the CDI, the County Council would effectively be prioritizing transient, lower-wage construction jobs (whose earnings largely leave the county) over the preservation of our community's quality of life, which attracts and retains higher-income residents. These higher-income residents contribute significantly more to Frederick County's tax base through property taxes, local spending, and support for local businesses. In essence, expanding the CDI risks driving away the very demographic that contributes most substantially and sustainably to Frederick County's economic vitality, in favor of a short-term, less impactful economic gain.

Beyond the direct impact on individual residents, the proposed CDI expansion poses severe negative ramifications for vital community institutions, such as St. Joseph Church in Adamstown. As a spiritual and communal anchor, St. Joseph Church would face:

Disruption of Worship and Contemplation: Churches are sanctuaries of peace, reflection, and communal worship. The constant, pervasive hum from data center cooling systems and the loud, intermittent noise from backup generator testing would directly intrude upon religious services, prayer groups, and quiet moments of contemplation. This relentless industrial noise would make it incredibly difficult to maintain a sacred and serene environment, fundamentally undermining the purpose and atmosphere of the church.

Diminished Aesthetic and Spiritual Environment: St. Joseph Church, like many rural churches, serves as a visual landmark and a symbol of community identity within a picturesque setting. Being surrounded by massive, industrial data center buildings would drastically alter the visual landscape, replacing natural beauty with industrial blight. Furthermore, the constant bright lighting required for security and operation, especially at night, would create significant light pollution, obscuring the night sky and intruding upon any evening church events or the peaceful ambiance that many find spiritually uplifting.

Impact on Community Gathering and Activities: Increased heavy vehicle traffic during the prolonged construction phase, and ongoing operational traffic (e.g., fuel deliveries, maintenance crews), would make it more challenging and less pleasant for parishioners to access the church. This could deter attendance at regular services, religious education classes, community potlucks, and other vital church activities, impacting the vibrancy and participation of the congregation.

Erosion of Membership and Financial Stability: As the community demographic shifts due to declining property values and the departure of higher-income residents, St. Joseph Church would face a shrinking membership base. This decline in active parishioners and financial contributions would directly threaten the church's ability to sustain its operations, ministries, and outreach programs, ultimately weakening its role as a community anchor and its capacity to serve those in need.

The County Council has a critical responsibility to safeguard the long-term well-being of its residents and the integrity of its natural and agricultural resources. We implore you to listen to the voices of the public and to reject any proposal that seeks to expand the Critical Digital Infrastructure (CDI) beyond the existing Quantum property. Prioritize the preservation of our rural legacy, our fertile farmlands, the health of our environment, and the cherished quality of life in communities like Adamstown. Do not sacrifice the long-term prosperity and well-being of your current, tax-contributing residents for short-sighted industrial expansion that will ultimately lead to lower home values and less overall revenue for Frederick County.

Thank you for your time and serious consideration of these vital matters.

Sincerely,

James, Karen

From: E Decker Orr <edeckerorr@comcast.net>
Sent: Tuesday, July 22, 2025 11:43 AM
To: Planning Commission
Subject: Comments for 7/23/25 meeting

[EXTERNAL EMAIL]

Dear Planning Commission Members,

I support the Sugarloaf Alliance's recommendations that the County limit hyperscale data center development to the Eastalco area. **It would be imprudent to expand beyond that area (as the proposed Overlay map does) before our count government understands the power, water and other impacts of the already-approved Eastalco data center projects.**

In addition, I support the following:

- **The CDI Overlay map should define a single, compact and contiguous area within the existing Eastalco Growth Area.**
- Data centers should not be sited next to residences (which they would be if this map is approved).
- Existing properties in **Rural Legacy, Priority Preservation, or Treasured Landscape areas** should not be included in the Overlay (which they would be if this map is approved).
- The Livable Frederick Master Plan sets out a wide range of studies and community engagements that are essential as part of any planning process for the future of the Eastalco Growth Area. **If the CDI Overlay is applied only to the existing Eastalco Growth Area, there is no need to change the growth boundary and no need to extend this approval process in order to comply with these requirements of the LFMP.**

Thank you for taking these important points and recommendations into consideration.

Elizabeth Orr
Burkittsville, MD
Edeckerorr@comcast.net

Sent from my iPhone

James, Karen

From: Sonia Demiray <soniademiray@climatecc.org>
Sent: Tuesday, July 22, 2025 11:52 AM
To: Planning Commission
Cc: david@demirayink.com
Subject: CDI Overlay Comment

[EXTERNAL EMAIL]

Frederick County Planning Commission
Comment on CDI Overlay Map
From Frederick County Resident
Sonia Demiray
1401 Jefferson Pike

Dear Planning Commissioners:

The Frederick County members of the Climate Communications Coalition urge you to keep any Data Center development inside the Eastalco Growth Area and not extend any CDI beyond these limits. Important reasons for this limitation include:

1. We do not know how long the A.I. technology will require Data Centers (see "[DeepSeek](#)") and crypto is a fad. In other words, we may be sacrificing our county's resources and environmental health for something that may be obsolete before we know it - all of this, incredibly, without a complete economic and environmental impact study;
2. There are far more convenient locations for Data Centers than Frederick County (or Maryland for that matter). Data Center tenants will follow cost efficiencies and move where there is ample water and energy in the long run;
3. Case in point: we do not have the water to cool Data Centers. In a proudly agricultural county, water must be prioritized for food production. In fact, a much better long-term approach to boost Frederick County's economy and to create many more jobs, would be to turn our cash-crop fields into regenerative farming including agroforestry, silvopasture, and permaculture and pre-empt the looming food-security crisis;
4. The grid is not ready to provide clean energy to county residents, let alone to the energy guzzlers that are Data Centers. We cannot continue to pump emissions into the atmosphere and worsen droughts and extreme weather events. Because of this, the county should insist that Data Center developers provide and pay for their own 100% clean energy sources (solar, wind, and geothermal) and avoid polluting our air, water, and soils; and,
5. Adamstown Residents, farmers, elementary school, and senior living facilities should not be further burdened by the inevitable noise, light, and air pollution (from Diesel-powered backup generators that will run a lot of the time until the grid is ready to host Data Centers) than they already are by the new Data Centers being built on the Eastalco site, the increased traffic, and construction. 500 foot setbacks for these enormous industrial facilities from family homes is by no means enough.

Recommendations:

1. Limit any Data Center in Frederick County to the Eastalco Growth Area.
2. Provide complete economic and environmental impact studies for any Data Center.
3. Require that any Data Center provide their own 100% clean supply of energy or at least a plan on how they will get there.
4. Require that Data Centers recycle all water and provide plans to the county on how much water will be used and where it is drawn from.
5. Require that Data Centers provide an exit strategy and set aside funds for the clean up of pollution, grounds, soils, land, creek, and forest restoration.
6. Establish air, water, noise, and light monitoring stations around the data centers.
7. Require that Data Centers switch off all exterior lights at night.

Thank you,
Sonia Demiray

[Sonia Demiray](#)

[Executive Director](#)

[Climate Communications Coalition](#)



ClimateCC.org

202-744-2948

James, Karen

From: Elizabeth Law <bettybob1758@gmail.com>
Sent: Tuesday, July 22, 2025 12:02 PM
To: Planning Commission
Cc: Gaines, Kimberly; Superczynski, Denis; Venable, Victoria; County Executive
Subject: Land Surveys for Transmission Line Begin
Attachments: Land Surveys for Transmission Line Begin.pdf

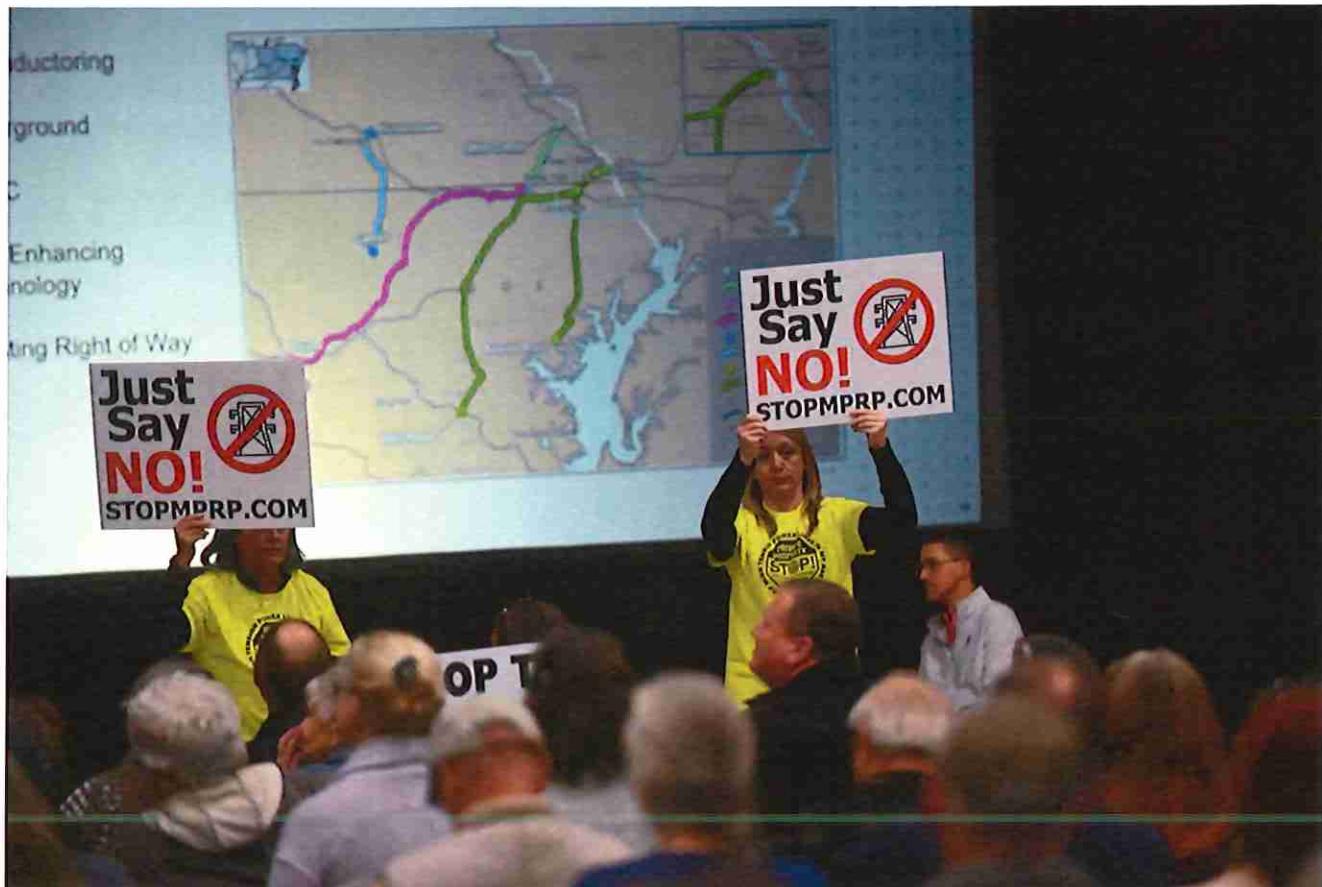
[EXTERNAL EMAIL]

Chair Tim Davis, Vice- chair Mark Long and Commission Members,

Please read the attached news article from the Baltimore Sun.
This is the kind of anguish that will be experienced by Maryland landowners if the proposed expanded Data Center Ordinance Map is accepted.

Please recommend that the CDI Zone remain the compact present area.
Sincerely,
Elizabeth Law, P.E. (retired)

Land surveys for proposed transmission line begin, despite resistance from residents



By Jessica Babb FOX45 News

Surveyors from Public Service Enterprise Group (PSEG), the developers behind a proposed 67-mile transmission line opposed by affected landowners, surveyed Baltimore County properties Monday.

PSEG notified the landowners last week that surveyors would access their property, after a federal judge granted them the right to do so.

"I feel sick when I get up in the morning, and when I get up at night because all I can think of is these people coming in here, invading us," said landowner Judy Fiedler.

A federal judge granted PSEG access to about 90 private properties for the survey work, citing laws related to eminent domain. Last week, PSEG filed a second lawsuit against nearly 200 additional landowners to access to additional properties along the route for the same reason.

"I am terrified of the precedent this sets and the federal lawsuit sets, because right now, where it stands, unless any of the appeals go through, any out-of-state utility can just go into any state and start doing surveys on land without going through the state level (Public Service Commission) process," said landowner Brandon Hill.

"It's discouraging," he added. "They still have to get PSC approval; it's by no means a done deal or anything, so I am trying to stay high in spirit."

Currently, the proposed, high-voltage transmission line is before the Maryland Public Service

Commission, which will determine if the project is needed, and if so, where exactly the line will be built. However, no decisions have been made, and a lengthy process of hearings and discovery is likely to follow.

In the meantime, according to PSEG, each property will require different surveys, which will take varying amounts of time.

A PSEG spokesperson said in a statement that property owners are notified at least 24 hours in advance of the survey work. The amount of time each survey will take depends on the property, the spokesperson noted.

“As an example, a property with no forest may only warrant a brief confirmation from the forest stand delineation efforts taking approximately one hour, while a property with a large volume of forest would take a couple of days,” the statement reads. “We encourage property owners to reach out to us directly for to discuss the site-specific surveys for their property.”

PSEG has stated that the transmission line is crucial in alleviating strain on the power system and helping to prevent blackouts.

For more information about the project, visit the PSEG website.

Have a news tip? Contact Jessica Babb at jlmitchell@sbgtv.com.

James, Karen

From: Elizabeth Law <bettybob1758@gmail.com>
Sent: Tuesday, July 22, 2025 12:09 PM
To: Planning Commission
Subject: Fwd: US Grid Faces Capacity Crunch for New Data Centers, Watchdog Warns

[EXTERNAL EMAIL]

Chair Tim Davis, Vice-chair Mark Long and Commission Members,

I don't usually forward you material in this fashion, but I believe this is important enough that you should be aware of enfolding events prior to tomorrow's Planning Commission meeting.

Jim Ballard is a power engineer who retired from FERC after 20 years.

Thank you,
Elizabeth Law, P.E. (retired)

-Jim

On Tuesday, July 22, 2025 at 05:51:42 AM MDT, Jim Ballard <comusmail-yahoo@yahoo.com> wrote:

This development should lead to almost an immediate end of data center investment and construction in Maryland, including all ongoing work at Adamstown.

This could be the beginning of the end of our local data center fight. I have to believe this recommendation is a result of PJM's latest capacity auction that PJM is going to release the results of today. Expect a big spike in capacity price for all electric rate payers due to lack of generation capacity. This is a national issue, as capacity inadequacy knows no boundaries. It will affect the entire nation.

This recommendation should also undermine the necessity of the MPRP, as when data center planners comply with the market monitor's recommendation, very little future transmission will be necessary to build future data centers.

The key quote is

"According to Joe Bowring, president of Monitoring Analytics, the independent watchdog for PJM, there is no spare capacity available to accommodate new data centers [1]. This situation necessitates that developers build their own power plants to meet the growing demand."

Maryland and Frederick County has painted itself into an energy policy corner and cannot comply with the Bowring's recommendation.

- Jim

Sent: Monday, July 21, 2025 at 09:37:34 PM MDT
Subject: PJM Faces Capacity Crunch for New Data Centers, Market Monitor Warns

US Grid Faces Capacity Crunch for New Data Centers, Watchdog Warns.

AinvestMonday, Jul 21, 2025 6:32 pm ET

PJM Interconnection, the largest US grid, lacks spare capacity for new data centers, meaning developers must build their own power plants. Artificial intelligence-driven demand is driving the biggest surge in electric demand in decades, adding stress to vulnerable grids. Tight supplies on PJM led to a record \$14.7 billion in an annual auction last year, and capacity prices are expected to reach all-time highs in the next auction. The grid's watchdog recommends an expedited review process for data centers that bring new generation to quickly connect to the grid.

PJM Interconnection, the largest US grid, is grappling with a significant capacity challenge as artificial intelligence (AI) drives a surge in electric demand. According to Joe Bowring, president of Monitoring Analytics, the independent watchdog for PJM, there is no spare capacity available to accommodate new data centers [1]. This situation necessitates that developers build their own power plants to meet the growing demand.

The demand surge is attributed to the increasing adoption of AI, which requires substantial computational power. PJM, which covers a significant portion of the US mid-Atlantic and Midwest regions, has been under pressure due to this unprecedented demand. Last year, PJM's annual auction saw record-breaking bids of \$14.7 billion, indicating the high cost of securing capacity [1]. Analysts predict that the upcoming auction will set new highs, driven by the accelerating growth of AI data centers [1].

To address the capacity issue, Bowring suggests an expedited review process for data centers that bring their own generation. This would facilitate quicker grid connections and help PJM better forecast long-term demand [1]. Such a process would also streamline the grid connection process, potentially reducing the review time from years to a more manageable period.

In response to the growing demand, several companies have taken strategic measures. Talen Energy, for instance, acquired two gas-powered plants for \$3.5 billion to capitalize on the increasing power requirements for AI data centers. This acquisition underscores Talen's commitment to the growing market [2]. Similarly, Google has announced a \$25 billion investment in data centers across the nation's largest electric grid over the next two years [3]. The company will also revamp two hydroelectric plants in Pennsylvania as part of a 20-year agreement with Brookfield Asset Management [3].

These investments highlight the significant financial commitments required to meet the energy demands of AI data centers. As AI technology continues to advance, the demand for energy will likely increase, necessitating further investments and strategic planning in the power sector.

References:

- [1] <https://www.bloomberg.com/news/articles/2025-07-21/large-us-grid-lacks-capacity-for-new-data-centers-watchdog-says>
- [2] <https://www.ainvest.com/news/talen-energy-surges-time-high-acquiring-power-plants-data-center-demand-2507/>
- [3] <https://nypost.com/2025/07/15/business/google-to-invest-25b-in-ai-data-centers-across-largest-us-electric-grid-over-next-2-years/>

On Friday, July 18, 2025 at 02:35:44 PM MDT, Jim Ballard <comusmail-yahoo@yahoo.com> wrote:
Re: Mid-Atlantic electric grid PJM not ready for data center boom, experts warn

From <https://san.com/cc/mid-atlantic-electric-grid-pjm-not-ready-for-data-center-boom-experts-warn/>

Mid-Atlantic electric grid PJM not ready for data center boom, experts warn

Jul 18, 2025 at 06:00 AM MDT

[Keaton Peters](#) (Energy Reporter)

Summary

PJM grid

Stretching from Chicago to Washington, D.C., the PJM electric grid already has the highest concentration of data centers in the U.S., and more are on the way following announcements from Big Tech.

Energy backlog

New electricity sources can spend five years waiting to connect to the PJM grid, which has experts worried that there will not be enough power to meet demand or supply Big Tech's energy needs.

Capacity market

The PJM grid includes a market for meeting power demand three years in the future. With forecasts of new data centers, the market is already causing higher electricity bills for consumers.

Full story

Big Tech wants to build more data centers in mid-Atlantic states like Pennsylvania and Virginia, but some experts say the electric grid isn't ready. As investments continue to pour into the region served by the PJM electric grid, experts warn that the grid already faces a backlog of renewable energy projects waiting to connect, as well as a pricing structure that has led to skyrocketing consumer costs.

"These data centers couldn't come at a worse time for PJM," Jon Gordon, policy director at Advanced Energy United, said at a media briefing organized by the [Reliable Grid Project](#).

Named for the states where it first started, Pennsylvania, New Jersey and Maryland, PJM is the largest regional electric grid operator in the United States. It serves 65 million Americans across 13 states, stretching from Chicago to Washington, D.C. Within the region, local utility companies serve customers directly, but PJM operates the market where utilities buy power. PJM also works to prevent blackouts by monitoring the flow of electricity and ensuring that supply and demand remain in balance.

Both Big Tech and the Trump administration are pushing for a rapid build-up of artificial intelligence, in part, to maintain a national security edge over foreign adversaries and to grow the economy. Across the country, tech companies are signing energy deals, and utility companies are rushing to provide the required energy for a substantial increase in computing power.

A single large data center can consume more power than 48 hospitals, and a [recent report](#) from Virginia's Joint Legislative Audit and Review Commission found that data centers currently consume as much electricity as 60% of homes in the state. Continued data center growth depends on a reliable grid that can expand its capacity to generate electricity.

How many data centers are planned for the PJM territory?

PJM's territory already has the highest concentration of data centers in the U.S., and the new additions show no signs of stopping.

On Tuesday, July 15, President Donald Trump visited Pittsburgh, Pennsylvania, to [highlight investments in data centers](#) and promote coal, gas and nuclear power. The Pennsylvania Energy and Innovation Summit coincided with multi-billion-dollar announcements from Google and investment firm Blackstone to build data centers in the state. Months earlier, Amazon Web Services also unveiled a \$20 billion plan to build data centers in Pennsylvania.

Virginia is home to more data centers than any other state with 586 currently in operation, according to [datacentermap.com](#). The website tracks cloud computing, cryptocurrency and "hyperscale" centers Big Tech typically uses to run AI tools. Maryland, New Jersey, Pennsylvania, Ohio and Washington, D.C. — all within PJM's territory — are home to more than 400 data centers combined.

Data centers can quickly shut down, which is already creating challenges for grid operators. In July 2024, a number of data centers in Virginia abruptly powered down in an event that came close to causing cascading blackouts, according to a [Reuters report](#). The North American Electric Reliability Corporation reported a similar event in February and recommended, in an [April report](#), that federal regulators take steps to mitigate risks from a sudden loss of electric load.

What is the energy backlog problem?

Supply has not kept up with this increasing electricity demand.

Companies that want to build wind, solar or power plants to add more electricity to the PJM grid are hitting a major bottleneck. Before projects start construction, developers need to sign an agreement with PJM assuring that the project will be able to connect to the grid. However, studies from [Columbia University](#) and the [Lawrence Berkeley National Laboratory](#) show that many

developers wait five years in the interconnection queue — a list of projects that have requested to connect to the grid but have not yet signed an agreement.

"There's enough of those resources in the queue to replace all of PJM's resources today," Gordon said.

More than 90% of that queue is made up of wind, solar and battery storage projects that could help meet growing electricity demand. Due to the lengthy approval process, these resources remain offline while data centers continue seeking locations in the region.

In 2022, PJM stopped taking any new interconnection requests until 2026 to clear the bottleneck. While ongoing efforts aim to expedite the process, the backlog poses a significant challenge for integrating large electric loads, like data centers.

"A data center can be built much more quickly than the infrastructure needed to support it," Gordon said. He added that much of PJM's underlying infrastructure is already getting old and many existing power plants are nearing the point of retirement.

What is PJM's capacity market?

Experts also worry about PJM's capacity market, which holds annual auctions to provide power three years in advance and help cover fixed costs. The intention is to maintain a sufficient electricity supply for future peak demand and incentivize energy companies to make long-term investments in new power plants.

Ric O'Connell, executive director of the nonprofit Grid Lab, said the capacity market is "almost like an insurance product."

Even though many data centers are not built yet, they are still making the capacity market more expensive, because capacity market auctions consider future demand forecasts.

"Consumers are on the hook for paying for this future demand," said Clara Summers, a campaign manager at the nonprofit Citizens Utility Board of Illinois.

Summers and other experts speaking at the briefing suggested a range of potential solutions to prevent consumers from continuing to pay the price for data center expansion. These include requiring data centers to make a down payment for long-term contracts, creating a separate customer class with different rates, and allowing utilities to curtail power consumption during peak demand periods.

Maggie Gordon (Senior Storytelling Editor) and Lawrence Banton (Digital Producer) contributed to this report.

On Tuesday, July 8, 2025 at 07:09:58 AM MDT, Jim Ballard <comusmail-yahoo@yahoo.com> wrote:
Re: US DOE: Generation Growth Must Match Needs Of A.I. Data Centers

From <https://www.energy.gov/articles/department-energy-releases-report-evaluating-us-grid-reliability-and-security>

<https://www.energy.gov/topics/reliability>

https://www.energy.gov/sites/default/files/2025-07/DOE%20Final%20EO%20Report%20%28FINAL%20JULY%207%29_0.pdf

and

<http://paenvironmentdaily.blogspot.com/2025/07/us-dept-of-energy-releases-report-on.html>

MONDAY, JULY 7, 2025

US Dept. Of Energy Releases Report On Electric Grid Reliability, Security Saying Generation Growth Must Match Needs Of A.I. Data Centers; But What About 'Ordinary People'?

On July 7, the U.S. Department of Energy released its [Report on Evaluating U.S. Grid Reliability and Security](#).

DOE said the analysis reveals that existing generation retirements and delays in adding new firm capacity, driven by the radical green agenda of past administrations, will lead to a surge in power outages and a growing mismatch between electricity demand and supply, particularly from artificial intelligence (AI)-driven data center growth, threatening America's energy security.

"This report affirms what we already know: The United States cannot afford to continue down the unstable and dangerous path of energy subtraction previous leaders pursued, forcing the closure of baseload power sources like coal and natural gas," said DOE Secretary Wright. "In the coming years, America's reindustrialization and the AI race will require a significantly larger supply of around-the-clock, reliable, and uninterrupted power. President Trump's administration is committed to advancing a strategy of energy addition, and supporting all forms of energy that are affordable, reliable, and secure. If we are going to keep the lights on, win the AI race, and keep electricity prices from skyrocketing, the United States must unleash American energy."

Among the highlights of the report:

-- **Grid growth must match the pace of A.I. innovation.** Electricity demand from AI-driven data centers and advanced manufacturing is rising at a record pace. The magnitude and speed of projected load growth cannot be met with existing approaches to load addition and grid management. Radical change is needed to unleash the transformative potential of innovation.

-- **The status quo is unsustainable.** DOE's analysis shows that, if current retirement schedules and incremental additions remain unchanged, most regions will face unacceptable reliability risks within five years and **the Nation's electrical power grid will be unable to meet expected demand for A.I., data centers, manufacturing and industrialization** while keeping the cost of living low for all Americans. Staying on the present course would undermine U.S. economic growth, national security, and leadership in emerging technologies.

DOE's report identifies regions most vulnerable to outages under various weather and retirement scenarios and offers capacity targets needed to restore acceptable reliability.

[Click Here for a copy of the report.](#)

[Click Here for a copy of the DOE announcement.](#)

What About 'Ordinary People'?

On May 12, PA Senate and House Committees held hearings on how the rapid increase in demand for electricity to power data centers filled with computers is impacting the price and availability of electricity for "ordinary people" on the regional electric grid operated by the PJM Interconnection. [Read more here.](#)

Jason Staneck, Executive Director for Governmental Services at PJM, told the committees the unprecedented increases in demand for electricity they are seeing-- "It's not people."

"Number one head and shoulders above any other customer is data centers. So it's for everything from bitcoin mining, to generative artificial intelligence, to cloud computing, to just maintaining the consumption of all the devices, the average household now has 21 connected devices."

"And we see that everywhere, it's become a global arms race for A.I."

Rep. Danilo Burgos (D-Philadelphia), Majority Chair of the House Consumer Protection, Technology & Utilities Committee, said-- "You stated [PJM] that people aren't the problem, but yet somehow people continue to carry the load of the payments."

"Our communities like mine and Rep. Rynavage and across Pennsylvania are going to be hurt with this increase of demand in the future, and I hope that the PJM will consider-- reconsider the way they allow projects to come online."

"Being as though what you stated that either it was lack of financing, or what other excuses that private entities came up with [for not bringing new electric generation online], hopefully will not happen in the future because our communities cannot afford it."

Sen. Gene Yaw (R-Lycoming), Majority Chair of the Senate Environmental Resources and Energy Committee, shared his concerns about the impact on "ordinary people."

"One of the issues that we've talked about is, I want to encourage generation capacity here, but I also want to serve the ordinary people, like everybody here.

"A.I. and data centers are great. I encourage them if we can find a way that they... and what they seem to be doing now is, they're enhancing their own power, so that they have a reliable source, they do it themselves.

"If we have some incentive for generation to come here, I want to make sure that generation goes to the, I can't think of a better word saying other than to say the ordinary people, the residential customers, and that they, quite honestly, can't take advantage of some incentive to come here and build for the limited use of an A.I. center.

"We're looking at that, and we're concerned about that."

James, Karen

From: Susan Gordon <segmessages@gmail.com>
Sent: Tuesday, July 22, 2025 11:00 PM
To: Planning Commission
Subject: Fwd: Comments of the CDI Overlay Session on July 23rd, 2025
Attachments: Letter Frederick County Planning Commission July 23 2025.docx

[EXTERNAL EMAIL]

Dear Planning Commission,

I attempted to send this on Tuesday afternoon but it wasn't delivered.

I am hoping this one will go through.

Susan Gordon

----- Forwarded message -----

From: Susan Gordon <segmessages@gmail.com>
Date: Tue, Jul 22, 2025 at 3:46 PM
Subject: Comments of the CDI Overlay Session on July 23rd, 2025
To: <planningcommission@frederickcountymd.gov>

Dear Planning Commission Members,

Thank you for your stellar work as data center development is considered in Frederick County.

My comments are attached,

Sincerely,

Susan Gordon
301-401-2446
segmessages@gmail.com

July 23, 2025

To The Frederick County Planning Commission,

My name is Susan Gordon, 1520 Laurel Wood Way, Frederick, MD. I would like to begin this letter by thanking you for your thoughtful and considered approach to data center development in Frederick County. Your questions of the County staff and warnings to the Council about reaching beyond what was agreed upon by the Data Center Workgroup have offered important cautions.

I have been concerned about the Council's disregard of your counsel. Today, I am writing in support of the positions taken by Sugarloaf Alliance and Envision Frederick as well as the scientists in this county such as Elizabeth Law, Jim Ballard, Kevin Sellner, and Bill Steigleman, who have the expertise to let us all know that energy and water issues will be paramount in the construction and running of these data centers. Those significant concerns have not been taken into account as the Council rushes to approve siting far beyond the original East Alco site and seeks to place them within 500 feet of residences.

I, personally have provided the Council with article after article documenting the disruption to entire cities and communities because water usage, energy supply, noise and diesel pollution have not been considered or regulated prior to the data centers being built in Georgia, Arizona, Ohio, Tennessee, and Northern Virginia.

Not only is our County Council doing the industries' bidding, they have also stripped any reporting mechanisms and complaint procedures from the citizens of this county.

Below are the words I spoke at the July 15, 2025 Council meeting. I stand behind them today.

July 15, 2025

To the Frederick County Council,

Good evening. My name is Susan Gordon, Frederick, MD 21701.

Sugarloaf Alliance and Envision Frederick have worked for four years to preserve the agricultural nature of the southern portion of Frederick County. The Data Center Workgroup developed a plan that aligned with that vision. The Knapp/Young Bill disposed of that plan.

We are now at a fork in the road. Will we keep our original commitment to ourselves, to Adamstown, to Buckeystown, to Ballenger Creek and to the farmers on some of the darkest and richest ground in Frederick County?

Or are we going back on our word and invite data centers in with CDI overlay shell game that promises one thing and intends another?

What has been most concerning in my communication with five members of the Council is their continued refusal to countenance facts on water and energy usage or the horrors visited on other communities across the nation by data centers.

I voted for Governor Wes Moore, but I diverge with him on this issue. He has his eye on some prize that doesn't consider constituent concerns, business only.

My brother lives in Ashburn, VA a half a mile from data centers with tree and neighborhood buffers between his town home and the data centers. One night, a few weeks ago, he woke up and thought his air conditioner compressor had gone up in smoke. In the morning there was an HOA announcement that the explosive noise throughout the night was the data center half a mile away.

In my last comments to the Council, I quoted an article from a Manassas paper in which their citizens, who had data centers built close to their existing homes, had replaced windows and roofs, can't sell their homes, are sleeping in their basements and still cannot get relief from either sound or vibration.

As far as I can tell from the proposed map, Don Pleasant's property is the one the Council is making an exception for--setting a precedent for data centers next to residences in this county.

My husband, Ralph Gordon, was Don Pleasant's attorney, until Ralph died in 1999. Ralph also counted Mr. Pleasants as a friend.

Ralph is not speaking here. I am, his wife.

Mr. Pleasants, I don't believe Ralph would want you to harm your neighbors.

From everything Ralph told me, I know you to be a good man.

Is there anything you can do with your property that would keep this Council from having the precedent to allow data centers near residences?

Perhaps that would be an example the Council could also follow.

Sincerely,

Susan Gordon

301-401-2446

segmessages@gmail.com

Of course, that plea to Mr. Pleasants, appealing to his better angels, is also a plea to the Council, to please put the needs and wellbeing for the citizens in Frederick County ahead of the knee bend to realtors, Catellus, and Amazon. As has been pointed out repeatedly, this Council has not asked for a cost/benefit analysis before they embark on this perilous path of unregulated data center sprawl next to residences in Adamstown.

Please continue your good work and corral their short-sighted greed.

Thank you,

Susan Gordon

segmessages@gmail.com

301-401-2446

James, Karen

From: Jessica Brotherton <jessicambrotherton@gmail.com>
Sent: Wednesday, July 23, 2025 7:22 AM
To: Planning Commission
Subject: Data centers

[EXTERNAL EMAIL]

Dear Planning Commission:

My name is Jessica Brotherton, and I'm writing to share my thoughts about the proposed data centers in Adamstown, MD. I'm asking that you please consider NOT expanding the CDI overlay zone out of the existing growth area. Please do not redraw the Rural Legacy Area or Priority Preservation Area to allow the expansion of the existing growth area. ANY expansion of the growth area will take from preservation areas and this will have a detrimental effect on the community.

We've seen the impacts that other counties locally have experienced, resulting in large scale environmental stress, public dissatisfaction and trust- all while generating MINIMAL long term economic or civic benefit. We deserve strong oversight measures. Frederick County is a beautiful place and has a strong agricultural base that deserves to flourish. It's important that we be stewards of the land for current and future generations.

My grandparents owned and operated a dairy farm in Frederick County for many years, and I would hate to see more beautiful farmland cleared and turned into parking lots/data centers.

We need to think about our legacies. What kind of world are we leaving our children? One where AI runs on data centers on our land, or one where kids can enjoy the beauty of our natural surroundings?

By proactively addressing environmental, health, and infrastructure concerns, our community can safeguard its character and quality of life while still enjoying smart development.

Thank you,

Jessica Brotherton

James, Karen

From: Nick Carrera <mjcarrera@comcast.net>
Sent: Tuesday, July 22, 2025 3:22 PM
To: Planning Commission
Subject: My remarks for July 23

[EXTERNAL EMAIL]

Dear Commissioners,

This is a draft of what I intend to say tomorrow, if I make it to the meeting. It's a "heads-up" so you can have your maps handy for reference. For me, at least, it took careful examination before I was reasonably sure I was reading them right.

Nick Carrera

Comments for the Planning Commission 7/23/25

I'm Nick Carrera, 2602 scenic Thurston Rd, Frederick

I have urged that the CDI Overlay Zone not extend beyond the current Quantum property. Expansion is not needed at this time, and issues regarding adequate infrastructure should be settled before any expansion is considered.

Referring to maps in the 47-page report we saw last week, I further urge that much of the Quantum property north of Manor Woods Rd not be included in the Overlay until we hear explanation of its curious, contradictory status.

Map 1 on page 4 of the report shows that parcels 3, 4, 7, and 8, owned by Quantum, lie outside the Community Growth Area. Map 2, page 6, shows they are also eligible for preservation status. Despite this, they have been proposed for the Overlay.

The Commissioners may wonder, as do I, why the county would take these parcels from preservation and propose them for data center construction. When Quantum bought them they surely knew they were outside the community growth area, zoned agricultural, and slated for preservation. Moreover, the county, as an honest seller, would have fully informed Quantum of their status. Why did Quantum buy anyway? Did they have assurance that their status would somehow be completely changed? We deserve explanation of how this contradictory situation has come about. Does the county respect community growth areas and continue its regard for preserving important county areas? We should have clarification before these properties can be considered for the Overlay.

I propose that, south of Manor Woods Rd, the Overlay include only Quantum property. Regarding that sliver east of New Design Rd, early Quantum people pledged it would stay forested and undeveloped. I hope that's still the case.

North of Manor Woods Rd the Overlay should include nothing outside the present Quantum property, minus the parcels in Map 2 numbered 3, 4, 7, and 8. They are outside the Community Growth Area, are zoned agricultural, and are slated for preservation. Those are reasons enough to leave them out for now. Thorough discussion of their contradictory status, and full consideration is needed before their status is changed in any way.

James, Karen

From: Susan Versichelli <suekjt@hotmail.com>
Sent: Tuesday, July 22, 2025 3:29 PM
To: Planning Commission
Subject: CDI Expansion

[EXTERNAL EMAIL]

Good afternoon,

I'm writing the County Planning Commission to voice my opposition to the expansion of the Critical Digital Infrastructure (CDI) zone.

There are nearly 2,000 acres within the existing growth area that can be developed for data centers. There is no need to expand any further especially when it impacts the agricultural industry and rural communities.

The area outside the existing growth area had been identified by both the county and state as where the best agricultural soils exist and should remain as large tracts of agricultural land to support a strong agricultural community and agricultural industry.

Any expansion of the existing growth area would be removing land from the preservation areas and have a detrimental effect on the agricultural and rural communities.

With regards,
Susan Versichelli

From: Kimberley Sanford <thesanfordcrew@gmail.com>
Sent: Tuesday, July 22, 2025 4:22 PM
To: Planning Commission
Subject: CDI Overlay Bill 25-09

[EXTERNAL EMAIL]

To the Members of the Frederick County Planning Commission and County Council:

I am writing as a concerned resident of Frederick County regarding the proposed CDI Overlay Bill 25-09 and the associated overlay map that will significantly influence the future development of data centers in our community.

As you prepare to vote on these measures, I urge you to consider several critical concerns that have not yet been adequately addressed and which raise serious questions about the viability and long-term impacts of these decisions.

1. Lack of Independent Cost-Benefit Analysis

It is deeply troubling that the County has not conducted an independent cost-benefit analysis of data center development. The only report currently referenced—the SAGE report—focuses solely on projected revenue, while completely omitting associated costs such as infrastructure strain, environmental impacts, public service demands, and long-term land use consequences. Without a full, balanced economic analysis, how can the Planning Commission or County Council make an informed decision? At present, it appears the industry is driving the conversation, not the County.

2. Flawed and Unenforceable Agricultural Preservation Proposal

The proposed idea of offsetting one acre of rezoned agricultural land with five acres preserved elsewhere—paid for by the developer through a Community Benefit Agreement—is highly speculative and unenforceable. As stated by Ms. Kathy Mitchell, Senior County Attorney, during the Planning Commission’s July 16th meeting, this arrangement relies “on the good graces of the developer.” That is not a sound legal or policy basis for such a consequential land-use decision. The agreement lacks guarantees, timelines, or clarity on where such preserved land would come from. Further, separating these agreements from the site plan process under the pretense of avoiding “contract zoning” still results in a deeply flawed and risky arrangement for the County and its residents.

3. Environmental Oversight and Developer Accountability

Frederick County’s recent experience with Quantum Loophole should serve as a cautionary tale. Over 80 environmental violations later, the developer was removed from the project, leaving the County to deal with the fallout. We cannot afford to rely on industry promises and goodwill to protect our environment or our community. If this is the precedent, what can we expect from future projects with even broader scope and fewer safeguards?

4. Unanswered Questions About Power and Infrastructure

One of the most urgent and under-discussed issues is the massive electrical demand that will accompany data center expansion. Where is the power coming from? The County is already an intervenor in the CPCN process for the MPRP transmission line application—will it intervene again when future infrastructure is required to support these centers? Simply dismissing these questions as "not part of the siting ordinance" is unacceptable and shortsighted.

5. Water Demand and Local Risk

Data centers consume enormous quantities of water. On July 14th, *The New York Times* reported on Newton County, Georgia, where Meta's \$750 million data center has reportedly caused local wells to run dry. Are we prepared for similar consequences here in Frederick County? Are our aquifers and water systems capable of handling this demand without compromising the needs of residents?

Conclusion: Moving Too Fast Without Clear Answers

While the effort to limit data center sprawl is commendable in principle, expanding data center zoning beyond the East Alcoa site at this time is premature. Too many critical questions remain unanswered, and too many risks are being taken on without proper public accountability, oversight, or analysis.

I strongly urge the Planning Commission and County Council to delay any further expansion and demand a full, independent cost-benefit analysis before moving forward. Our county deserves a future that is planned with transparency, sustainability, and integrity—not one rushed through under the influence of outside interests.

Sincerely,

Kimberley Sanford

Green Hill Manor Resident

Adamstown, Maryland

James, Karen

From: Barry Salisbury <bksalisbury@gmail.com>
Sent: Tuesday, July 22, 2025 4:39 PM
To: Planning Commission
Subject: Please do not expand the CDI overlay or redraw the Rural Legacy or Priority Presentation Area

[EXTERNAL EMAIL]

Dear Planning Commission,

Please work to protect our beautiful county. Data centers use extraordinary amounts of water and electricity. Limiting their footprint is prudent.

Please Do Not expand the CDI overlay zone out of the EXISTING growth area.

Please Do Not redraw the Rural Legacy Area or the Priority Preservation Area to allow the expansion of the existing growth area/CDI overlay zone.

The future is in your hands.

Thank you!

Barry Salisbury

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Do not be conformed to this world, but be transformed by the renewing of your minds, so that you may discern what is the will of God—what is good and acceptable and perfect. Romans 12:1-2 (NRSV)

James, Karen

From: Patrice Gallagher <pgallj@aol.com>
Sent: Tuesday, July 22, 2025 4:50 PM
To: Planning Commission
Subject: CDI Overlay Map comments
Attachments: PC.CDI.overlay.map.7_21_25.pdf

[EXTERNAL EMAIL]

Please find my comments for the Planning Commission, attached.

Thank you for sending them along to the PC members!

Patrice Gallagher

Patrice Gallagher
Gallagher Design
www.patricegallagher.com
102 W Church Street
Frederick MD 21701
301.471.3720

Dt: July 21, 2025
Re: CDI Overlay Map
Fr: Patrice Gallagher, Frederick

Dear Chair Davis and members of the Planning Commission,

I'm writing re: the CDI Overlay Map you'll be considering on July 23.

Many of the comments I wrote to you on July 7 still apply regarding the map. To summarize those comments:

- We don't know enough about the true costs and benefits of data centers yet, to expand them beyond the Eastalco/QL site. I would love to see a thorough study by our County or our State, but until then, let's go slowly.
- There are many questions remaining unanswered about the availability of power and water, as well as effects on our environment and our local economy. Again, proceeding slowly by not expanding beyond the current Eastalco footprint makes sense, given these facts.

Further, I would like to associate myself with the comments submitted to you by the Sugarloaf Alliance. Their observations about the Livable Frederick Master Plan also very effectively argue for keeping data center development within the Eastalco property confines.

Thank you for considering my comments, and many thanks for your work.

Patrice Gallagher
115 E. 5th Street
Frederick, MD 21701

James, Karen

From: Toni <toni@jamesonline.us>
Sent: Tuesday, July 22, 2025 4:51 PM
To: McKay, Steve
Cc: Knapp, Renee; Duckett, Kavonte; Carter, Mason; Fitzwater, Jessica; Keegan-Ayer, MC; Young, Brad; Donald, Jerry; Planning Commission
Subject: Data Center Overlay in Adamstown

[EXTERNAL EMAIL]

Good Afternoon **Elected** Officials of Frederick County,

I have kept up to date on the happenings on the previous East Alcoa site. Saying I am not happy about it and do not approve does no good, so let's move on from there.

What you are proposing now with you overlay of farmland is nothing short of unconscionable. Farmland for data centers? I am at a loss for words.

Driving through Adamstown literally brings a smile to my face. Absolutely beautiful. Trees, Wildlife. Winding roads through the country. Already the landscape has changed. Living in Adamstown for 25 years, I think I can count on one hand how many turtles I have seen on the road. In the last 4 months I have seen 6 and one of them was dead. Dirt everywhere. I almost witnessed a cement truck take out an older lady getting her mail on Mountville Rd. To avoid her, he came into my lane. Guess where I went? I know it is hard to believe, but the people in Adamstown and how they live should be of major importance to you, but I don't think you ever even discuss it. We vote and pay taxes. A lot of taxes. I might see a Sheriff's car come through Adamstown once a year. We have nothing in Adamstown other than farmland and houses. Stups is great for a gallon of milk and a 6 pack, but you can't even get in the parking lot now. And why is there nothing in Adamstown? Because it is not zoned for anything else and is the reason I bought a house here. But now you wave your magic wand and turn it into Gov. Moore's quantum capital I believe he called it. I see that Rowan is doing its best to keep palms greased in Frederick County, but at no time has any of that grease made its way to Adamstown.

And what you are proposing for Carroll Manor Elementary School is abysmal. These kids will live 24/7 in data centers. A lot of these kids live in Green Hill Manor so they will see it out their window at home, see it lit up at night, and here it buzzing and humming all day and night. The Expressions Program will need to move. If the humming noise penetrates through the school, these children with sensory issues will literally go ballistic. It is shocking that you would surround a school with data centers. I seriously hope you are putting mountains of dirt and 20 foot trees to stop the noise and visual pollution we will all be subject to.

I am embarrassed for our County to know that someone had a hand in pushing this through when the data centers already approved have not even been sold in their entirety. Why are we rushing this through? What kickbacks are coming to our County from Baltimore that we are not privy to. Why are we being kept in the dark?

I addressed my email to Mr. McKay since he seems to be the only person questioning any of this and asking the right questions. The purpose of my email is to tell you that I do not approve of your overlay proposal AT ALL. I am looking forward to seeing what our County Government plans to do to offset the decrease in value of our homes and our lives once this is approved. Once these giant cement buildings take over our farmland, there is no going back. I am confident that those of you on the County Council who are in bed with the farmers who want to sell will make sure they are well taken care of while the rest of us who can't afford to move even if we wanted to live with this crap for the rest of eternity.

This can't be undone.

Respectfully,

Toni James
Adamstown, MD

My apologies if I left an one off the list of employees that should have been included.

James, Karen

From: Carolyn Coelho <carolynlouisecolho@gmail.com>
Sent: Tuesday, July 22, 2025 6:53 PM
To: Planning Commission
Subject: Please Stop Expanding the Data Centers

[EXTERNAL EMAIL]

Dear Planning Commission,

I am a resident of Adamstown. I live very close to the new Data Center. Please stop the expansion of these centers.

You are destroying our beautiful homes, our beautiful county, our community and our peace of mind. Adamstown is a beautiful place to live.

We do not want to be inundated with noise pollution. We do not want our resources (water, land, clean air) STOLEN by these Data Centers.

We do not want our peace STOLEN. You would not want this in your neighborhood, please don't put it in ours.

Please do not allow our county to be used, abused, drained, and left out to dry by these corporations. For what????? Tik Tok? Chat GPT? META's profit margin?

We will be okay without these Data Centers. We don't want all of this expansion. Please do not let this project take our town.

Thank you,
Carolyn Coelho

James, Karen

From: Kathy Calvert <kathykalvert1@gmail.com>
Sent: Tuesday, July 22, 2025 7:53 PM
To: Planning Commission
Subject: Proposed expansion of Data Center in Adamstown

[EXTERNAL EMAIL]

I urge the Frederick County Planning Commission to restrict any expansion of the Data Center in Adamstown (at the former Eastalco site). Any expansion would have a detrimental effect on both agriculture and the rural community of Adamstown (where I have lived for almost 40 years).

Frederick County and the State have both identified where the best soils exist and where continuous tracts are needed to support our agricultural community. The expansion would encroach on these areas. Further, the proposed expansion is unacceptably close to our existing communities in Adamstown. And, Potomac Edison has already stated it is incapable of handling the needs of the currently zoned industrial area. Clearly there are compelling reasons not to allow expansion of the Data Center. Please do not allow this proposed expansion.

Kathy Calvert
5784 Morland Dr N
Adamstown, MD 21710

James, Karen

From: Valerie Fox <vee41582@gmail.com>
Sent: Tuesday, July 22, 2025 8:08 PM
To: Planning Commission
Subject: Limit Data Centers and Preserve Rural Frederick County

[EXTERNAL EMAIL]

Good evening,

I'm writing as a long time resident of Frederick County to share my thoughts regarding the expansion of the proposed data centers in Adamstown, MD. I'm asking that you please consider NOT expanding the CDI overlay zone out of the existing growth area. Please do not redraw the Rural Legacy Area or Priority Preservation Area to allow the expansion of the existing growth area/CDI overlay zone. Any expansion of the growth area will have to be removed from the preservation areas and this will have a detrimental effect on the community.

Our community values, and infrastructure capacity deserve protections equivalent to those adopted elsewhere. We've seen the impacts that other counties locally have experienced, resulting in large scale environmental stress, public dissatisfaction and trust- all while generating MINIMAL long term economic or civic benefit. We deserve strong oversight measures. Frederick County is a beautiful place to live and has a strong agricultural base that deserves to flourish. It's important that we be stewards of the land for current and future generations.

By proactively addressing environmental, health, and infrastructure concerns, our community can safeguard its character and quality of life while still enjoying smart development.

Becoming a "sacrifice zone" for commercial interests isn't the future of Frederick County.

Thank you,

Valerie Fox
8306 Brookmere Blvd

James, Karen

From: Mike Spurrier <mspurrier819@gmail.com>
Sent: Tuesday, July 22, 2025 1:00 PM
To: Planning Commission
Subject: Please limit the impacts of Data Centers and Preserve What's Left of Rural Frederick County

Importance: High

[EXTERNAL EMAIL]

Members of the Frederick County Planning Commission:

I was born and raised in Frederick County; I am now 66 years old. I have witnessed many changes to Frederick County, but the rapid growth, loss of family farms and agriculture, and the rampant development of farmland is devastating. Now we are faced with the prospect of turning preserved farmland and Rural Legacy Areas into data center complexes that use land, water, and energy (electricity).

Please limit the impact of the Critical Data Infrastructure (CDI) overlay zone by taking the following steps:

1. If necessary, create a CDI overlay zone for data centers but,

2. Do Not expand the CDI overlay zone out of the EXISTING growth area.

3. Do Not redraw the Rural Legacy Area or the Priority Preservation Area to allow the expansion of the existing growth area / CDI overlay zone.

Thank you very much for your consideration of my comments.

Mike

Mike Spurrier
240-446-0305
mspurrier819@gmail.com

Please consider supporting the Maryland Bird Conservation Partnership (MBCP) as we work to protect native birds and preserve habitat. For more information or to make a donation, please visit the MBCP website at: <https://marylandbirds.org/>

James, Karen

From: Nicole M <wales2012@gmail.com>
Sent: Tuesday, July 22, 2025 1:17 PM
To: Planning Commission
Subject: Critical Digital Infrastructure in Adamstown

[EXTERNAL EMAIL]

Good afternoon,

I am writing to voice my concerns with the CDI overlay zone that will affect Adamstown and Frederick County. I don't have an issue with creating a CDI overlay zone for data centers, however, there is no need to expand the CDI overlay zone out of the EXISTING growth area and there is no need to redraw the Rural Legacy Area or the Priority Preservation Area to allow the expansion of the existing growth area/CDI overlay zone. Leave the zone as it is and help citizens preserve and protect the areas in which we live. Please listen to the people on this issue.

Thank you for your time.

Sincerely,

Nicole Mooney

James, Karen

From: Tom V <hrafn221@gmail.com>
Sent: Tuesday, July 22, 2025 2:08 PM
To: Planning Commission
Subject: Public Input: CDI Expansion

[EXTERNAL EMAIL]

Good afternoon,
I'm writing the County Planning Commission to voice my opposition to the expansion of the Critical Digital Infrastructure (CDI) zone.

There are nearly 2,000 acres within the existing growth area that can be developed for data centers. There is no need to expand further especially when it impacts the agricultural industry and the rural communities.

The areas outside of the existing growth area had been identified by both the county and state as where the best soils exist and where would be the most effective in having large continuous tracts of land needed to be kept in agriculture to support a strong agricultural community and agricultural industry.

Any expansion of the growth area will have to be removed from the preservation areas and have a detrimental effect on the community.

Best,

Thomas E. Versichelli

James, Karen

From: Theresa <scrutiny1000@gmail.com>
Sent: Tuesday, July 22, 2025 8:24 PM
To: Planning Commission; Livable Frederick
Subject: CRITICAL DIGITAL INFRASTRUCTURE OVERLAY ZONE

[EXTERNAL EMAIL]

Tim Davis, Chair
Mark Long, Vice Chair
Sam Tressler III, Secretary
Craig Hicks
Barbara Nicklas
Elizabeth Pasierb
Joel Rensberger
Kimberly Gaines, Director, Livable Frederick
Denis Superczynski, Livable Frederick Planning Manager

Dear Members of the Planning Commission and Livable Frederick:

I know you have already received many well-founded objections to the CRITICAL DIGITAL INFRASTRUCTURE OVERLAY ZONE scheduled for a vote on July 23rd. The rationale behind these concerns have been thoroughly communicated by various stakeholders; therefore, I will refrain from reiterating those points. I respectfully request that the CRITICAL DIGITAL INFRASTRUCTURE OVERLAY ZONE not be approved. This decision will significantly affect both Adamstown and all of Frederick County. I encourage careful consideration of all objections and thoughtful evaluation of the long-term consequences as you make this important decision for Frederick County's future.

Regards,

Theresa Rutter
Adamstown, MD

James, Karen

From: Lauren Weldon <lodon@gmail.com>
Sent: Tuesday, July 22, 2025 9:15 PM
To: Planning Commission
Subject: Expansion of CDI Overlay Zone

[EXTERNAL EMAIL]

Dear Planning Commission:

My name is and I'm writing to share my thoughts about the proposed data centers in Adamstown, MD. I'm asking that you please consider NOT expanding the CDI overlay zone out of the existing growth area. Please do not redraw the Rural Legacy Area or Priority Preservation Area to allow the expansion of the existing growth area. ANY expansion of the growth area will take from preservation areas and this will have a detrimental effect on the community.

We've seen the impacts that other counties locally have experienced, resulting in large scale environmental stress, public dissatisfaction and trust- all while generating MINIMAL long term economic or civic benefit. We deserve strong oversight measures. Frederick County is a beautiful place and has a strong agricultural base that deserves to flourish. It's important that we be stewards of the land for current and future generations.

By proactively addressing environmental, health, and infrastructure concerns, our community can safeguard its character and quality of life while still enjoying smart development.

Thank you,

Lauren Weldon

James, Karen

From: Emily Snyder <emily.snyder17@gmail.com>
Sent: Tuesday, July 22, 2025 9:42 PM
To: Planning Commission
Subject: CDI Overlay: thoughts from a farmer
Attachments: July 2025 CDI Overlay letter to Planning Commission.docx

[EXTERNAL EMAIL]

Hi there,

I apologize for how late this is-- I just saw my first message was "undeliverable" as I made a mistake and used .com instead of .gov on the email address.

I hope you will be able to at least skim my comments before tomorrow's meeting.

Thank you for your time, commitment, and service to our County!

Emily Snyder
240 405 4365

----- Forwarded message -----

From: **Emily Snyder** <emily.snyder17@gmail.com>
Date: Mon, Jul 21, 2025, 4:34 PM
Subject: CDI Overlay: thoughts from a farmer
To: <planningcommission@frederickcountymd.com>

Hello Planning Commission members,

Please see my attached letter in regards to the CDI overlay you'll be making decisions on this week.

I appreciate your time, dedication, attention, and all the effort you are putting in for our County.

Thank you,

Emily Snyder
240 405 4365

James, Karen

From: NJ Warren <nancyjane2000@gmail.com>
Sent: Tuesday, July 22, 2025 9:52 PM
To: Planning Commission
Subject: Public Comment for Meeting 7/23/25

[EXTERNAL EMAIL]

Dear Chair Davis and Planning Commission Members

I urge you to slow down the planning process for the development of data centers in Frederick County. Concerned citizens have raised numerous questions about the serious problems that this development will bring, and County officials have not provided complete and satisfactory answers to those questions. County officials focus on the potential revenue resulting from the project, but remain silent on the critical issues of decreased property values near the project, the source of power generation and the air pollution it creates, the impact of lack of support infrastructure, traffic disruption, catastrophic overuse of our water resources, noise pollution, and light pollution. There are also questions about the rezoning of agricultural land that must be addressed fully, with hard facts. Additionally, it is imperative that Frederick County maintains the power to enforce any and all actions that industry promises to take. We need a deliberation with facts and figures so that the people know exactly what we are getting into with this project. These are questions that must be answered to the satisfaction of the citizens of Frederick County BEFORE any plan is approved, or hopefully, rejected.

Sincerely,
Nancy Warren
Middletown

From: Hope Green <hope.green76@yahoo.com>
Sent: Tuesday, July 22, 2025 10:24 PM
To: Planning Commission
Subject: Opposition to CDI Overlay

[EXTERNAL EMAIL]

Planning Commissioners,

Based on information from the Center for American Progress (CAP) and Conservation Science Partners (CSP), the United States is losing natural areas at a rate equivalent to roughly one football field every 30 seconds due to human development. This translates to a loss of approximately 2,880 acres per day.

In addition, the Land Trust Alliance reports that the U.S. is losing approximately 150 acres of natural land and 40 acres of farmland every hour, totaling about 4,560 acres lost per day.

The American Farmland Trust estimates that the country is losing 2,000 acres of farmland per day. This adds to the overall loss of land in the U.S. but specifically highlights the impact on agricultural areas.

The Nature Conservancy's 2024 annual report mentions that nearly 6.5 million hectares (16 million acres) of forests were lost globally in 2023 alone. While this is a global figure and not solely specific to the U.S., it emphasizes the significant loss of forests, which are vital for carbon absorption.

According to Techtarget.com:

There are various areas of environmental concern that show the depth of the issues data centers face.

- 1. Energy usage**
- 2. Water consumption**
- 3. Electronic and toxic waste**

According to the United Nations, electrical and electronic equipment that is disposed of incorrectly is known as electronic waste, or e-waste. This waste stream

can directly affect externalities, such as resource consumption, GHG emissions and the release of toxic substances.

4. Land use

Where data centers are built and how they are built can impact the environment. Smaller data centers may take up 100,000 square feet, but larger data centers may require millions of square feet. That's a lot of land that needs clearing, which can wipe out biodiversity in an area and have other unintended widespread effects.

Take, for example, the data center proposal named the Prince William Digital Gateway in Prince William County, Virginia. Establishing the data center would require rezoning 2,100 acres of land. According to Bay Journal, [more than 30 regional](#) and national organizations, including the National Park Service and Virginia Department of Forestry, said the project's impacts could be irreversible and have long-term tangible and intangible environmental costs

5. Greenhouse gas emissions

[Greenhouse gases](#) are gases that trap heat in the atmosphere. Such gases include the likes of CO₂, methane and nitrous oxide. When trapped, these gases can stay in Earth's atmosphere for different amounts of time, ranging from a few years to thousands of years. This thickening of the Earth's atmosphere makes the planet warmer.

According to The Intergovernmental Panel on Climate Change, there are significant reasons for concern for global warming above 1.5° C. In short, it could result in drastic changes to our climate, including everything from extreme weather to complete species extinction.

Knowing this and the fact that 2,100 acres are already committed, why would you make a conscious decision to expand before knowing the full impacts of the current Quantum site?

Twenty-one acres have already been sentenced to doom. Land that will never be green again or productive, no longer open and arable. Unable to percolate rain,

capture carbon, provide food and habitat, lifeless with no hope of restoration. Natural to unnatural at what cost to us. Data centers will not sustain us. Only the environment can: clean air, water, healthy soil, plants, animals, insects in proper balance. All this will be lost to us by data center development.

This cannot be a political decision to reward developers with lucrative zoning. There's too much at stake and we've lost too much already.

"Whether we and our politicians know it or not, Nature is party to all our deals and designs, and she has more votes, a larger memory, and a sterner sense of justice than we do." - Wendell Berry

Respectfully,

Hope Green

5515A, 5515B, 5252 Mountville Rd, Adamstown

From: peterblood3213@comcast.net
Sent: Wednesday, July 23, 2025 8:08 AM
To: Planning Commission
Subject: CDI Overlay

[EXTERNAL EMAIL]

Frederick County has already approved the Eastalco data center complex, which will transform little Adamstown Maryland, into one of the largest concentrations of data centers in the world. With the potential for two dozen hyperscale data centers, Adamstown will be another Data Center Alley.

Sadly, that ship has sailed. That's not why we're here.

We're here to decide if the county should approve an **overlay** that **DOUBLES approved data center acreage**. I've heard some County Commissioners say, "*We won't allow the data center sprawl that happened in Virginia here.*" And yet, we are **poised to do exactly that**. So, I have **two pieces of advice**:

FIRST: DON'T CAVE TO DEVELOPMENT PRESSURE

I'm perplexed by the county's waffling stance on land preservation. Why are areas designated as **Rural Legacy, Priority Preservation, and Treasured Landscapes** being considered for development? I took several courses in planning in college and at no time was I taught that it's good policy to preserve land—only to “un-preserve” it later. **Extend the Overlay only as far as the Eastalco Growth Area, so it is compliant with Livable Frederick.**

Next, the idea that we should swap an acre of preservation-worthy land for five mystery-acres is not just impractical, but devious, like Monty Hall asking us to give up our treasured land for what's behind door #2. The entire point of preservation is—to **preserve, so honor your preservation commitments**. Let's keep preserved land preserved.

SECOND: GO SLOW. GET EXPERIENCE. AND APPLY LESSONS LEARNED.

Right now, **Frederick County has no hyperscale data centers**. We lack **real-world experience** with their water needs, power demands, and how to keep **millions** of gallons of diesel stored safely.

But once Eastalco is built out, we'll suddenly have:

- **Two dozen massive, water-thirsty, power-hungry, noisy machines ...**
- **That will create enormous pressures on our residents, utilities and water supply, and likely increase utility bills and require more transmission lines.**

Right now, we **cannot confirm** we have enough power, water, or fire response capacity to support Eastalco. The county has still not conducted a **thorough, independent analysis of both costs and benefits**. **So why double the risk before we've measured the impacts? It's irresponsible.**

The prudent approach is to:

- **Wait to see how Eastalco turns out,**
- **Learn from that experience before doubling the expansion area, and**
- **Apply the lessons learned to future planning.**

Let's learn from Eastalco before expanding—so we can make informed decisions and protect our future.

Thank you,
Peter Blood
Urbana, MD

James, Karen

From: Jamie Moses <jrmoses26@gmail.com>
Sent: Wednesday, July 23, 2025 8:19 AM
To: frederickcounty.council@mccouncilmd.lmhostediq.com; Planning Commission
Subject: Urgent Concerns Regarding the Proposed Expansion of the Critical Digital Infrastructure (CDI) Beyond the Quantum Property – A Threat to Adamstown and Frederick County's Future

[EXTERNAL EMAIL]

To the Esteemed Members of the Frederick County Council,

We are writing to you today as deeply concerned residents of Adamstown and Frederick County to express our profound apprehension regarding the proposed expansion of the Critical Digital Infrastructure (CDI) beyond the existing Quantum (formerly Eastalco) property. We understand that the Planning Commission will be reviewing a proposed map early next week, and that their recommendation will likely carry significant weight with the County Council. We urge you to consider the long-term, detrimental impacts such an expansion would have on our community, our environment, and the very character of Frederick County.

The Quantum property, encompassing approximately 2,000 acres, is already designated within the county's growth area. It is vital to acknowledge that this land, despite its current industrial zoning, represents some of the most fertile agricultural land in Frederick County. Its conversion to data centers means a permanent loss of invaluable productive farmland, impacting our local food systems and agricultural heritage.

Our primary concern, however, lies with any proposal to expand the CDI beyond the boundaries of the Quantum property. Such an expansion would inevitably encroach upon areas that have been meticulously designated as Rural Legacy Areas and/or Priority Preservation Areas. These designations were established through careful planning and public input to protect our county's natural beauty, ecological diversity, and cherished rural character. Sacrificing these irreplaceable landscapes for industrial development would be a profound betrayal of the very principles of responsible land use and environmental stewardship that our county claims to uphold.

For the residents of Adamstown, the implications of such an expansion are particularly dire. Our community thrives on its rural setting, offering a quality of life that is increasingly rare. Expanding the CDI would lead to a multitude of negative impacts, directly affecting our daily lives and the long-term viability of our community:

Noise Pollution: Data centers operate 24/7, requiring constant cooling. The massive industrial fans and backup generators produce a relentless, high-decibel hum that would permeate our quiet rural environment, disrupting peace and quiet, impacting sleep, and reducing the enjoyment of our homes and outdoor spaces. Construction noise would also be significant and prolonged.

Massive Water Consumption: Data centers are voracious consumers of water for their cooling systems. Expanding the CDI would place an unsustainable demand on Frederick County's finite water resources. This increased demand could lead to water shortages, particularly during drought periods, impacting residential water supply, agricultural irrigation, and the health of local waterways. Loudoun County, for

example, has seen its data centers' potable water usage increase by 250% since 2021, consuming hundreds of millions of gallons annually.

Air Quality Degradation: Beyond the dust and particulate matter from prolonged construction, the operation of backup diesel generators at data centers can release harmful pollutants into the air, including nitrogen oxides and fine particulate matter. This directly impacts air quality, posing potential health risks to residents, especially those with respiratory sensitivities. Concerns about cumulative air quality impacts from data centers are a significant issue in areas with high concentrations of these facilities.

Visual Pollution and Light Trespass: The sheer scale of data center buildings, often resembling large, windowless boxes, is fundamentally incompatible with the rural aesthetic of Adamstown. Furthermore, the constant bright lighting required for security and operation, especially at night, would create significant light pollution, obscuring our night sky and intruding upon the privacy and tranquility of nearby homes.

Decreased Property Values and Demographic Shift: The proximity of large-scale industrial data centers, with their associated noise, visual blight, traffic, and environmental concerns, will undeniably and significantly decrease the home values of Adamstown residents. Our homes are our most significant investments, and this expansion would directly undermine their worth. Adamstown is currently an upper-middle-class community, and a decline in property values, coupled with a diminished quality of life, will inevitably lead to these higher-income residents seeking more desirable locations. This exodus would transform our vibrant, upper-middle-class community into one with lower home values, resulting in less tax revenue for Frederick County as these higher-earning taxpayers leave.

We urge the County Council to learn from the cautionary tale unfolding in Loudoun County, Virginia, often referred to as "Data Center Alley," which hosts the world's largest concentration of data centers. Despite the significant tax revenue generated, Loudoun County residents and officials are now grappling with severe negative consequences:

Strain on Power Grid and Reliance on Fossil Fuels: The explosive energy demand from data centers has placed an immense strain on Loudoun County's power grid, leading to concerns about the continued reliance on fossil fuel plants and the need for massive new transmission lines. This directly undermines climate goals and clean energy initiatives.

New Transmission Lines and Infrastructure: To meet the insatiable power demands, new and expanded high-voltage transmission lines are being built, cutting through conserved lands, parks, and established neighborhoods, further industrializing once-rural areas and impacting residents' quality of life.

Environmental Degradation: Beyond water and air quality issues, the sheer scale of data center development in Loudoun has led to concerns about widespread land consumption, increased stormwater runoff from vast impervious surfaces, and impacts on wildlife habitat.

Regret Over Siting Decisions: Even Loudoun County officials have expressed regret, admitting that "if we had to do it over again, we would do it a little bit different. There's definitely instances where land has gotten too close to residential." This admission underscores the irreversible damage caused by unchecked expansion.

Furthermore, while the promise of job creation often accompanies such developments, it is crucial to examine the true economic impact on our local community. We observe that the majority of the construction workforce for these data centers often consists of individuals from lower-income housing areas of West Virginia or Pennsylvania. While we respect all workers, these are largely temporary construction jobs. The long-term, high-paying operational jobs within data centers are typically few and require specialized skills, often not filled by local residents. By expanding the CDI, the County Council would effectively be prioritizing transient, lower-wage construction jobs (whose earnings largely leave the county) over the preservation of our community's quality of life, which attracts and retains higher-income residents. These higher-income residents contribute significantly more to Frederick County's tax

base through property taxes, local spending, and support for local businesses. In essence, expanding the CDI risks driving away the very demographic that contributes most substantially and sustainably to Frederick County's economic vitality, in favor of a short-term, less impactful economic gain.

Beyond the direct impact on individual residents, the proposed CDI expansion poses severe negative ramifications for vital community institutions, such as St. Joseph Church in Adamstown. As a spiritual and communal anchor, St. Joseph Church would face:

Disruption of Worship and Contemplation: Churches are sanctuaries of peace, reflection, and communal worship. The constant, pervasive hum from data center cooling systems and the loud, intermittent noise from backup generator testing would directly intrude upon religious services, prayer groups, and quiet moments of contemplation. This relentless industrial noise would make it incredibly difficult to maintain a sacred and serene environment, fundamentally undermining the purpose and atmosphere of the church.

Diminished Aesthetic and Spiritual Environment: St. Joseph Church, like many rural churches, serves as a visual landmark and a symbol of community identity within a picturesque setting. Being surrounded by massive, industrial data center buildings would drastically alter the visual landscape, replacing natural beauty with industrial blight. Furthermore, the constant bright lighting required for security and operation, especially at night, would create significant light pollution, obscuring the night sky and intruding upon any evening church events or the peaceful ambiance that many find spiritually uplifting.

Impact on Community Gathering and Activities: Increased heavy vehicle traffic during the prolonged construction phase, and ongoing operational traffic (e.g., fuel deliveries, maintenance crews), would make it more challenging and less pleasant for parishioners to access the church. This could deter attendance at regular services, religious education classes, community potlucks, and other vital church activities, impacting the vibrancy and participation of the congregation.

Erosion of Membership and Financial Stability: As the community demographic shifts due to declining property values and the departure of higher-income residents, St. Joseph Church would face a shrinking membership base. This decline in active parishioners and financial contributions would directly threaten the church's ability to sustain its operations, ministries, and outreach programs, ultimately weakening its role as a community anchor and its capacity to serve those in need.

The County Council has a critical responsibility to safeguard the long-term well-being of its residents and the integrity of its natural and agricultural resources. We implore you to listen to the voices of the public and to reject any proposal that seeks to expand the Critical Digital Infrastructure (CDI) beyond the existing Quantum property. Prioritize the preservation of our rural legacy, our fertile farmlands, the health of our environment, and the cherished quality of life in communities like Adamstown. Do not sacrifice the long-term prosperity and well-being of your current, tax-contributing residents for short-sighted industrial expansion that will ultimately lead to lower home values and less overall revenue for Frederick County.

Thank you for your time and serious consideration of these vital matters.

I wish you had focused on finding a way to add a middle school to this area that is greatly needed if you visit both Crestwood and Ballenger Creek Middle Schools you will see they are busting at the seems.

Sincerely,

The Bird Family

James, Karen

From: MARCEL Aillery <aillery@msn.com>
Sent: Wednesday, July 23, 2025 9:06 AM
To: Planning Commission
Cc: MARCEL Aillery
Subject: Data Center expansion in southern Frederick County

[EXTERNAL EMAIL]

Frederick County Planning Commission members,

As a resident of Point of Rocks and founding member of the (now inactive) Carrollton Manor Land Trust which worked to establish the Carrollton Manor Rural Legacy Area in partnership with the County, I am very concerned with the proposed Data Center expansion at the former Alcoa Eastalco property.

The buildout will have enormous impacts on southern Frederick County region and beyond –impacts that have not been thoroughly examined in the view of many. For all the public concerns raised thus far, I ask that you support a cautious go-it-slow approach –and restrict the Critical Data Infrastructure (CDI) Overlay Zone to the Eastalco area currently zoned Limited or General Industrial. This buildout alone would dramatically alter the character of our region and raises critical questions regarding energy demand, water supply, and direct impacts on neighborhoods, cultural resources, and farming operations. That is clear. In addition, more careful attention needs to be given, in my view, to site plan restrictions on current and proposed construction that eliminates or mitigates potential adverse impacts.

I am unable to attend this morning's Planning Commission meeting, but am attaching below my 6-17-2025 letter to the County Council (with a few very minor revisions) that provides some additional detail.

Respectfully,

Marcel Aillery
3710 Tuck Avenue
Point of Rocks, MD 21777
aillery@msn.com
240-285-1647

From: MARCEL Aillery <aillery@msn.com>
Sent: Tuesday, June 17, 2025 5:05 PM
To: councilmembers@frederickcountymd.gov <councilmembers@frederickcountymd.gov>
Cc: MARCEL AILLERY <aillery@msn.com>
Subject: Re: Data Center expansion in southern Frederick County

Frederick County Council members,

Thank you for hosting today's open meeting on the proposed Data Center Industrial Zone in southern Frederick County, which I plan to attend as space permits. I'd like to take this opportunity to convey my concerns regarding the scale of Data Center expansion under discussion and potential regional impacts.

I think back to the 2001 Adamstown Region Plan, and all the many County planning partnerships with local residents that informed and followed development of the Region Plan. This was an exciting period for community engagement, with residents of Adamstown, Buckeystown and Point of Rocks (including myself) working together with County staff on various planning initiatives – guided by and large, by a shared vision for the future of our County region.

One outcome of these collaborations was the formation of the Carrollton Manor Land Trust (CMLT) –a community-based non-profit entity working to preserve our region’s rural character and vibrancy of our local farm economy. CMLT activities involved information outreach on farmland preservation programs and grant funding support for voluntary farmland easement acquisition. And perhaps CMLT’s signature achievement was the establishment of the Carrollton Manor Rural Legacy Area (CMRLA) in 2003 under the Maryland Rural Legacy Program, in partnership with Frederick County. Successful CMRLA designation reflected the concentration of contiguous agriculturally-productive farmland in southern Frederick County, their proximity to important natural and cultural resources, the strength of public-private partnerships, and the threat of development through farmland conversion. While CMLT is no longer an active trust entity, I remain grateful to the County for its continued commitment to funding and expansion of our Rural Legacy Area over the past 20-plus years.

However, I understand the County is now considering an Overlay Zone on or near the former Alcoa Eastalco property that would allow for Data Center development on up to 4,500 acres within the heart of the Carrollton Manor Rural Legacy Area. It was understood that intensive development would likely one day occur on the 1,600 acres of the GI/LI-zoned acreage within the Eastalco property, representing a significant expansion of industrialized area beyond the 200 acres occupied by the former Eastalco plant. And it was always the assumption that appropriate setbacks, building restrictions, earthen berms/walls, forest buffers and other mitigation measures would be put in place to minimize adverse impacts –though I understand these concerns may not have been adequately addressed for Data Center development currently underway. This proposed Overlay Zone raises a new level of concern.

The notion of allowing Data Center expansion up to 4,500 acres at or near the former Eastalco site amounts to a massive increase in the amount of industrial area concentration in the region. Rural Legacy Area boundaries would likely need to be redrawn and Priority Preservation status withdrawn from some agricultural parcels to accommodate this scale of expansion—which is not a precedent we want to set. And such expansion significantly increases the prospect of future additional transmission line development through area farmland and beyond to support increased energy demand. This represents to me a significant breach in the County’s commitment to the Carrollton Manor Rural Legacy Area, and a willingness to dramatically alter the character of much of the region. Is this truly what our County Council envisions for our region?

As Frederick County considers the Data Center Overlay Zone, this is what I would hope for:

- The maximum permitted acreage for Data Center buildout within the Overlay Zone—currently proposed at 4,500 acres—is significantly reduced. I understand that Data Center development is limited, for now, to the 1,600 acres of Industrial-zoned land within the Alcoa site .. and I personally hope that no additional land will be permitted for Data Center expansion.
- The County requires strong binding language on mitigation measures for site plan development, including appropriate setbacks, building design requirements, noise reduction measures, and viewshed protections, with special attention given to Carroll Manor Elementary School, St. Joseph on Carrollton Manor Catholic Church, the Carrollton Manor house, nearby residential areas, and major road arteries (New Design Road, Ballenger Creek Pike).
- A significant effort is made to promote reclaimed and recycled water use, given the amount of water consumed for Data Center cooling purposes. I also feel it makes sense to co-locate renewable energy

development (eg. geothermal, rooftop solar) within Data Center project areas; however, I understand that any onsite energy production would represent a small share of onsite energy demand.

· The County undertakes a thorough review of all potential ramifications of the proposed Data Center development, including impacts on residential communities (ie, viewsheds, noise, property values), anticipated increases in electricity rates, and water demand scenarios during low-flow drought periods especially .. as well as farmland prices and preservation incentives within the Carrollton Manor Rural Legacy Area.

Dedicating one percent of County land to Data Center development may appear reasonable on the face of it. But these decisions can have longterm damaging community impacts where facilities are concentrated, both monetary and non-monetary, with broader economic and resource impacts that are only incompletely understood. Any new development will need to be scaled appropriately and designed to the highest standards based on a comprehensive review of all the various potential impacts.

Go slow, hear your constituents, and be mindful of tradeoffs.

Respectfully,

Marcel Aillery
3710 Tuck Avenue
Point of Rocks, MD 21777
aillery@msn.com
240-285-1647

James, Karen

From: Adamstown Resident <residentadamstown@gmail.com>
Sent: Wednesday, July 23, 2025 9:23 AM
To: Planning Commission; Cherney, Ragen; McKay, Steve; Young, Brad; Knapp, Renee; Carter, Mason; Donald, Jerry; Keegan-Ayer, MC; Duckett, Kavonte
Subject: Re: Urgent Concerns Regarding the Proposed Expansion of the Critical Digital Infrastructure (CDI)

[EXTERNAL EMAIL]

The experience for those living directly next to these facilities can be starkly different and negatively impact their quality of life and, potentially, their home's market appeal and appreciation rate.

Here are more details on the quality-of-life impacts for individual homeowners immediately adjacent to large data centers in Loudoun County, VA:

1. Unrelenting Noise Pollution:

- **Constant Drone:** The most frequently cited complaint is a persistent, low-frequency hum or drone from the cooling fans and HVAC systems that operate 24/7. Residents describe it as sounding like a "propeller," a "loud drone hovering," a "big fan," or even a "freight train" or "airplane engine."
- **Temperature Sensitivity:** The noise can intensify significantly with temperature drops, peaking when it's around 50 degrees Fahrenheit, as the fans work harder to bring in cooler air. This means the sound can be worse during cooler months or at night.
- **Penetration and Inescapability:** This artificial noise is often described as "going through walls" and being heard even with windows closed. Unlike typical neighborhood sounds (like lawnmowers), it's constant, providing no escape.
- **Health and Well-being Impacts:** The continuous noise leads to:
 - **Sleep Disturbances:** Residents report difficulty sleeping, sleep deprivation, and being woken up in the middle of the night.
 - **Anxiety and Stress:** The invasive nature of the sound can cause anxiety and affect mental well-being and productivity.
 - **Reduced Enjoyment of Home:** People may avoid spending time outdoors (e.g., in backyards, gardens) or even in certain parts of their homes where the noise is most audible. Some homeowners have resorted to using white-noise machines or even living in their basements to escape the sound.

2. Significant Visual Blight and Industrialization of Residential Areas:

- **Massive Structures:** Data centers are large, often multi-story (now up to three stories), warehouse-like buildings, typically with few windows. Their sheer scale can dwarf nearby residential homes.
- **Loss of Aesthetic Appeal:** For homeowners who invested in areas for their suburban or semi-rural character, the sudden appearance of these industrial behemoths can drastically alter the visual landscape, replacing green spaces or open views with concrete and steel.

- **Ancillary Infrastructure:** The data centers require massive electrical infrastructure, including new, tall high-voltage transmission lines and large substations. These can be visually intrusive, further industrializing the immediate vicinity and potentially cutting through areas once envisioned as open space or residential. One case saw a substation proposal rejected due to its location directly across from newly built residential neighborhoods, highlighting the visual and community impact.

3. Construction Impacts and Lingering Effects:

- **Blasting and Damage:** During the construction phase, blasting for data center projects has been reported to cause physical damage, such as cracked drywall in nearby homes.
- **Ongoing Disruption:** Construction can bring additional noise, dust, and traffic for extended periods.

4. Financial and Market Appeal Challenges:

- **Reduced Buyer Pool:** The quality-of-life issues (noise, visual intrusion) can make homes directly adjacent to data centers less appealing to a broad segment of homebuyers who prioritize peace, quiet, and residential aesthetics. This can narrow the pool of potential buyers.
- **Slower Appreciation or Stagnation:** While county-wide values may rise, homes directly affected by these negative externalities might see a slower rate of appreciation or even stagnation compared to similar homes not impacted. One resident expressed waiting for mortgage rates to drop to sell, stating, "If I would have known what I was walking into a few years back, I would not have chosen this place." This implies a perceived reduction in value or desirability after experiencing the impact.
- **Investment in Mitigation:** Some homeowners have spent significant money (e.g., \$17,000 on soundproof windows) in attempts to mitigate the noise, sometimes with limited success, adding an unexpected financial burden.
- **"Not a Good Quality of Life":** This sentiment directly impacts market appeal. When residents feel their quality of life is severely diminished, they are more likely to want to move, and new buyers are more likely to be deterred, affecting demand and ultimately price.

In essence, while data centers provide significant economic benefits and tax revenue to Loudoun County, the brunt of the negative quality-of-life impacts falls disproportionately on those homeowners who find themselves living immediately next to these industrial-scale facilities. This can translate into real challenges in terms of enjoying their homes and potentially realizing the same level of property value appreciation as other areas within the county.

On Mon, Jul 21, 2025 at 9:16 PM Adamstown Resident <residentadamstown@gmail.com> wrote:

To the Esteemed Members of the Frederick County Council,

Subject: Urgent Concerns Regarding the Proposed Expansion of the Critical Digital Infrastructure (CDI) Beyond the Quantum Property – A Threat to Adamstown and Frederick County's Future

We are writing to you today as deeply concerned residents of Adamstown and Frederick County to express our profound apprehension regarding the proposed expansion of the Critical Digital Infrastructure (CDI) beyond the existing Quantum (formerly Eastalco) property. We understand that the Planning Commission will be reviewing a proposed map early next week, and that their

recommendation will likely carry significant weight with the County Council. We urge you to consider the long-term, detrimental impacts such an expansion would have on our community, our environment, and the very character of Frederick County.

The Quantum property, encompassing approximately 2,000 acres, is already designated within the county's growth area. It is vital to acknowledge that this land, despite its current industrial zoning, represents some of the most fertile agricultural land in Frederick County. Its conversion to data centers means a permanent loss of invaluable productive farmland, impacting our local food systems and agricultural heritage.

Our primary concern, however, lies with any proposal to expand the CDI beyond the boundaries of the Quantum property. Such an expansion would inevitably encroach upon areas that have been meticulously designated as **Rural Legacy Areas** and/or **Priority Preservation Areas**. These designations were established through careful planning and public input to protect our county's natural beauty, ecological diversity, and cherished rural character. Sacrificing these irreplaceable landscapes for industrial development would be a profound betrayal of the very principles of responsible land use and environmental stewardship that our county claims to uphold.

For the residents of Adamstown, the implications of such an expansion are particularly dire. Our community thrives on its rural setting, offering a quality of life that is increasingly rare. Expanding the CDI would lead to a multitude of negative impacts, directly affecting our daily lives and the long-term viability of our community:

- **Noise Pollution:** Data centers operate 24/7, requiring constant cooling. The massive industrial fans and backup generators produce a relentless, high-decibel hum that would permeate our quiet rural environment, disrupting peace and quiet, impacting sleep, and reducing the enjoyment of our homes and outdoor spaces. Construction noise would also be significant and prolonged.
- **Massive Water Consumption:** Data centers are voracious consumers of water for their cooling systems. Expanding the CDI would place an unsustainable demand on Frederick County's finite water resources. This increased demand could lead to water shortages, particularly during drought periods, impacting residential water supply, agricultural irrigation, and the health of local waterways. Loudoun County, for example, has seen its data centers' potable water usage increase by 250% since 2021, consuming hundreds of millions of gallons annually.
- **Air Quality Degradation:** Beyond the dust and particulate matter from prolonged construction, the operation of backup diesel generators at data centers can release harmful pollutants into the air, including nitrogen oxides and fine particulate matter. This directly impacts air quality, posing potential health risks to residents, especially those with respiratory sensitivities. Concerns about cumulative air quality impacts from data centers are a significant issue in areas with high concentrations of these facilities.
- **Visual Pollution and Light Trespass:** The sheer scale of data center buildings, often resembling large, windowless boxes, is fundamentally incompatible with the rural aesthetic of Adamstown. Furthermore, the constant bright lighting required for security and operation, especially at night, would create significant light pollution, obscuring our night sky and intruding upon the privacy and tranquility of nearby homes.
- **Decreased Property Values and Demographic Shift:** The proximity of large-scale industrial data centers, with their associated noise, visual blight, traffic, and environmental concerns, will undeniably and significantly **decrease the home values** of Adamstown residents. Our homes are our most significant investments, and this expansion would directly undermine their worth. Adamstown is currently an upper-middle-class community, and a decline in property values, coupled with a diminished quality of life, will inevitably lead to these higher-income residents seeking more desirable locations. This exodus would transform our vibrant, upper-middle-class community into one with lower home values, resulting in **less tax revenue for Frederick County** as these higher-earning taxpayers leave.

We urge the County Council to learn from the cautionary tale unfolding in **Loudoun County, Virginia**, often referred to as "Data Center Alley," which hosts the world's largest concentration of data centers. Despite the significant tax revenue generated, Loudoun County residents and officials are now grappling with severe negative consequences:

- **Strain on Power Grid and Reliance on Fossil Fuels:** The explosive energy demand from data centers has placed an immense strain on Loudoun County's power grid, leading to concerns about the continued reliance on fossil fuel plants and the need for massive new transmission lines. This directly undermines climate goals and clean energy initiatives.
- **New Transmission Lines and Infrastructure:** To meet the insatiable power demands, new and expanded high-voltage transmission lines are being built, cutting through conserved lands, parks, and established neighborhoods, further industrializing once-rural areas and impacting residents' quality of life.
- **Environmental Degradation:** Beyond water and air quality issues, the sheer scale of data center development in Loudoun has led to concerns about widespread land consumption, increased stormwater runoff from vast impervious surfaces, and impacts on wildlife habitat.
- **Regret Over Siting Decisions:** Even Loudoun County officials have expressed regret, admitting that "if we had to do it over again, we would do it a little bit different. There's definitely instances where land has gotten too close to residential." This admission underscores the irreversible damage caused by unchecked expansion.

Furthermore, while the promise of job creation often accompanies such developments, it is crucial to examine the true economic impact on our local community. We observe that the majority of the construction workforce for these data centers often consists of individuals from lower-income housing areas of West Virginia or Pennsylvania. While we respect all workers, these are largely temporary construction jobs. The long-term, high-paying operational jobs within data centers are typically few and require specialized skills, often not filled by local residents. By expanding the CDI, the County Council would effectively be prioritizing transient, lower-wage construction jobs (whose earnings largely leave the county) over the preservation of our community's quality of life, which attracts and retains higher-income residents. These higher-income residents contribute significantly more to Frederick County's tax base through property taxes, local spending, and support for local businesses. In essence, expanding the CDI risks driving away the very demographic that contributes most substantially and sustainably to Frederick County's economic vitality, in favor of a short-term, less impactful economic gain.

Beyond the direct impact on individual residents, the proposed CDI expansion poses severe negative ramifications for vital community institutions, such as **St. Joseph Church in Adamstown**. As a spiritual and communal anchor, St. Joseph Church would face:

- **Disruption of Worship and Contemplation:** Churches are sanctuaries of peace, reflection, and communal worship. The constant, pervasive hum from data center cooling systems and the loud, intermittent noise from backup generator testing would directly intrude upon religious services, prayer groups, and quiet moments of contemplation. This relentless industrial noise would make it incredibly difficult to maintain a sacred and serene environment, fundamentally undermining the purpose and atmosphere of the church.
- **Diminished Aesthetic and Spiritual Environment:** St. Joseph Church, like many rural churches, serves as a visual landmark and a symbol of community identity within a picturesque setting. Being surrounded by massive, industrial data center buildings would drastically alter the visual landscape, replacing natural beauty with industrial blight. Furthermore, the constant bright lighting required for security and operation, especially at night, would create significant light pollution, obscuring the night sky and intruding upon any evening church events or the peaceful ambiance that many find spiritually uplifting.
- **Impact on Community Gathering and Activities:** Increased heavy vehicle traffic during the prolonged construction phase, and ongoing operational traffic (e.g., fuel deliveries, maintenance crews), would make it more challenging and less pleasant for parishioners to

access the church. This could deter attendance at regular services, religious education classes, community potlucks, and other vital church activities, impacting the vibrancy and participation of the congregation.

- **Erosion of Membership and Financial Stability:** As the community demographic shifts due to declining property values and the departure of higher-income residents, St. Joseph Church would face a shrinking membership base. This decline in active parishioners and financial contributions would directly threaten the church's ability to sustain its operations, ministries, and outreach programs, ultimately weakening its role as a community anchor and its capacity to serve those in need.

The County Council has a critical responsibility to safeguard the long-term well-being of its residents and the integrity of its natural and agricultural resources. We implore you to listen to the voices of the public and to **reject any proposal that seeks to expand the Critical Digital Infrastructure (CDI) beyond the existing Quantum property.** Prioritize the preservation of our rural legacy, our fertile farmlands, the health of our environment, and the cherished quality of life in communities like Adamstown. Do not sacrifice the long-term prosperity and well-being of your current, tax-contributing residents for short-sighted industrial expansion that will ultimately lead to lower home values and less overall revenue for Frederick County.

Thank you for your time and serious consideration of these vital matters.

Sincerely,
Elyse Wilson

Ken Stephens

2799 Decatur Drive

Adamstown, MD 21710

James, Karen

From: Melissa Francis <mfrancis620@gmail.com>
Sent: Wednesday, July 23, 2025 9:26 AM
To: Planning Commission
Subject: No more data center growth

[EXTERNAL EMAIL]

Hello,

I am writing as a resident of Adamstown who is asking you to stop any further expansion with a CDI overlay around the current data center property. We are already seeing first-hand what is happening to the land that is currently part of the data center property and we are concerned about challenges such as water supply & electrical demands that have not been studied before potentially agreeing to more data center land. We are concerned about noise and light pollution affecting our property. We haven't even seen how the current data center property is going to affect the area, so why are you rushing to add more? And why is the small town of Adamstown being forced to bear the load of data centers in the county?

I grew up in Walkersville and when my husband and I decided to buy a home and start a family, Adamstown was the perfect place. We have worked hard over the past 15 years to turn our home into the vision we had of a place to raise our family. We love the small town feel, the sense of community and the beauty that surrounds us. We never imagined that we may feel it necessary to move because of something like data centers being nearby. We are concerned about light and noise pollution and our property value decreasing. We don't want to see concrete buildings out our windows and on our drive home every day. This is not the Frederick County I know and love. We live one street over from Carroll Manor Elementary, which was a plus to us to have our kids walk to school. And now it's a negative - 500 feet is nothing when it comes to spacing between homes and data centers.

Rural Legacy Land and Priority Preservation Land was designated as such for a reason and should not be changed. I hope you will make the right decision to STOP the spread of data centers in our county and near the homes of those who trust you to make the right decision. Our way of life in Adamstown is at stake.

Thank you,
Melissa Francis

James, Karen

From: Judy Thompson <middletownlady@gmail.com>
Sent: Wednesday, July 23, 2025 9:31 AM
To: Planning Commission
Cc: Council Members
Subject: CDI Overlay
Attachments: July9PressRelease.docx; July9PressRelease.docx

[EXTERNAL EMAIL]

Dear Frederick County Planning Commission Members:

I regret I cannot attend your meeting this morning in which the CDI Overlay Map will be considered. I am sending my recommendation via this email.

At the very least, halt any expansion of data center development beyond what is legally required to Quantum Loophole and any other centers. Please conduct a comprehensive study of the demands this development will make on our electricity and water usage as well as noise levels created by the data centers. The working group the Council appointed made such a recommendation.

I am particularly concerned about the impact of the data center development on my electricity bill and those of all Frederick County residents.

Please see attached Office of People's Counsel (OPC) Press Release dated July 9, in which David S. Lapp, Esq., Maryland People's Council, says, " "In future months and years, Maryland customers will see their utility bills rise significantly if regulators don't fix current policies so that existing utility customers aren't forced to pay for infrastructure that would not be built except for the business strategies of some of the wealthiest corporations in the world."

Why does this potential increase in our electricity bills receive scant to no attention in the run-up to these centers?

Thank you for your attention to my concern.

Judy I. Thompson
Middletown MD 21769

From: Elyse Wilson <elysewilsonkhk@gmail.com>
Sent: Wednesday, July 23, 2025 9:35 AM
To: Planning Commission; Cherney, Ragen; McKay, Steve; Young, Brad; Knapp, Renee; Carter, Mason; Donald, Jerry; Keegan-Ayer, MC; Duckett, Kavonte
Cc: Ken Stephens
Subject: Adamstown Residents told to sell homes with Data Centers expand

[EXTERNAL EMAIL]

I live in Green Hill Manor. Our neighborhood was told we should sell if you expand the data centers due to what happened below to the houses next to the houses in Loudoun County VA

Due to this information that happened to Loudoun County VA homes next to Data Centers the people of Green Hill Manor and Adamstown Commons and those living on New Design and Adamstown Rd were recommended to sell our homes before we lose all our equity:

The experience for those living directly next to these facilities can be starkly different and negatively impact their quality of life and, potentially, their home's market appeal and appreciation rate.

Here are more details on the quality-of-life impacts for individual homeowners immediately adjacent to large data centers in Loudoun County, VA:

1. Unrelenting Noise Pollution:

- **Constant Drone:** The most frequently cited complaint is a persistent, low-frequency hum or drone from the cooling fans and HVAC systems that operate 24/7. Residents describe it as sounding like a "propeller," a "loud drone hovering," a "big fan," or even a "freight train" or "airplane engine."
- **Temperature Sensitivity:** The noise can intensify significantly with temperature drops, peaking when it's around 50 degrees Fahrenheit, as the fans work harder to bring in cooler air. This means the sound can be worse during cooler months or at night.
- **Penetration and Inescapability:** This artificial noise is often described as "going through walls" and being heard even with windows closed. Unlike typical neighborhood sounds (like lawnmowers), it's constant, providing no escape.
- **Health and Well-being Impacts:** The continuous noise leads to:
 - **Sleep Disturbances:** Residents report difficulty sleeping, sleep deprivation, and being woken up in the middle of the night.
 - **Anxiety and Stress:** The invasive nature of the sound can cause anxiety and affect mental well-being and productivity.
 - **Reduced Enjoyment of Home:** People may avoid spending time outdoors (e.g., in backyards, gardens) or even in certain parts of their homes where the noise is most audible. Some homeowners have resorted to using white-noise machines or even living in their basements to escape the sound.

2. Significant Visual Blight and Industrialization of Residential Areas:

- **Massive Structures:** Data centers are large, often multi-story (now up to three stories), warehouse-like buildings, typically with few windows. Their sheer scale can dwarf nearby residential homes.
- **Loss of Aesthetic Appeal:** For homeowners who invested in areas for their suburban or semi-rural character, the sudden appearance of these industrial behemoths can drastically alter the visual landscape, replacing green spaces or open views with concrete and steel.
- **Ancillary Infrastructure:** The data centers require massive electrical infrastructure, including new, tall high-voltage transmission lines and large substations. These can be visually intrusive, further industrializing the immediate vicinity and potentially cutting through areas once envisioned as open space or residential. One case saw a substation proposal rejected due to its location directly across from newly built residential neighborhoods, highlighting the visual and community impact.

3. Construction Impacts and Lingering Effects:

- **Blasting and Damage:** During the construction phase, blasting for data center projects has been reported to cause physical damage, such as cracked drywall in nearby homes.
- **Ongoing Disruption:** Construction can bring additional noise, dust, and traffic for extended periods.

4. Financial and Market Appeal Challenges:

- **Reduced Buyer Pool:** The quality-of-life issues (noise, visual intrusion) can make homes directly adjacent to data centers less appealing to a broad segment of homebuyers who prioritize peace, quiet, and residential aesthetics. This can narrow the pool of potential buyers.
- **Slower Appreciation or Stagnation:** While county-wide values may rise, homes directly affected by these negative externalities might see a slower rate of appreciation or even stagnation compared to similar homes not impacted. One resident expressed waiting for mortgage rates to drop to sell, stating, "If I would have known what I was walking into a few years back, I would not have chosen this place." This implies a perceived reduction in value or desirability after experiencing the impact.
- **Investment in Mitigation:** Some homeowners have spent significant money (e.g., \$17,000 on soundproof windows) in attempts to mitigate the noise, sometimes with limited success, adding an unexpected financial burden.
- **"Not a Good Quality of Life":** This sentiment directly impacts market appeal. When residents feel their quality of life is severely diminished, they are more likely to want to move, and new buyers are more likely to be deterred, affecting demand and ultimately price.

In essence, while data centers provide significant economic benefits and tax revenue to Loudoun County, the brunt of the negative quality-of-life impacts falls disproportionately on those homeowners who find themselves living immediately next to these industrial-scale facilities. This can translate into real challenges in terms of enjoying their homes and potentially realizing the same level of property value appreciation as other areas within the county.

James, Karen

From: Nick Carrera <mjcarrera@comcast.net>
Sent: Wednesday, July 23, 2025 3:55 PM
To: Planning Commission
Subject: Cost-benefit

[EXTERNAL EMAIL]

I differ from the caller who impugned the Commission's work, although as an Adamstown resident she has cause for agitation. Today's session was an especially good one. I was glad to hear Mr. Davis say the "record is still open," and it got me thinking on the way home, in connection with Steve Poteat's remarks.

Steve didn't notice that Tom Natelli, speaking just before him, had adjusted the mike upward, to accommodate his height. As a consequence, and since Steve is a soft speaker, I could hardly hear him, and I was closer than you were. His topic is an important one, and I'd like to make the points that perhaps didn't come across because of the microphone distance.

A revenue study by Sage was presented to the Data Centers Workgroup (DCW). There were two salient points: that Quantum, at full build-out, would produce \$41 million revenue for the county; and that if the county imposed a personal property tax on data centers, revenue would be hugely greater. How much greater? A study was done by an outfit called MuniCap; results are given on pages 13 and 14 of the DCW's Final Report. They calculated revenues for tax rates of \$1.80 and \$2.00 per \$100 valuation. They lie between Montgomery County's \$1.735 and Washington County's \$2.1815. and well below Loudoun County's \$4.200. Their results: \$66.9 M and \$74.4 M. It is a continuing mystery why the county has not jumped on that possibility. Buddy Rizer told us that if Loudoun had no personal property tax, their revenue from data centers would fall by 85%. If \$41 M revenue would be good for Frederick County, how much better would, say, \$66.9 M or \$74.4 M be? But before you go looking for that pot of gold, let's consider that Sage report.

The Sage Report calculated only revenue from data centers, not costs. This is another continuing mystery. What careful investor would support a major project without careful analysis of both benefits and costs? The relevant bottom line is the *net* expected benefit. Citizens have raised this point time and time again, yet county officials appear uninterested. A realistic picture is crucial. Landowners will make a bundle in selling to data centers. Savvy data center people will make a bundle because they know the game and control how it's played with local and state officials. And for all the hoopla we usually hear from N. Virginia, there are sad cases where greenhorn county officials have really been taken for a ride. (Many of you are probably on Bill Wright's mailing list, with his daily posting of data center doings in Virginia. You could just send him an email and he can point you to a few such instances.)

Steve and Blanca Poteat did their own study, using reliable sources, and found the net benefit from the data centers at full Quantum build-out would be *negative*. Their approach was not complicated, nor was it devious. They don't claim it was perfect, but it is one more cogent reason the county should commission a careful, unbiased study of the *NET* benefits to the county from data centers.

James, Karen

From: Nick Carrera <mjcarrera@comcast.net>
Sent: Wednesday, July 23, 2025 4:05 PM
To: Planning Commission
Cc: Poteat, Steve; Poteat, Blanca; Carrera, Nicholas
Subject: The email I just sent you was premature

[EXTERNAL EMAIL]

Dear Commissioners,

I just sent you an email on cost-benefit analysis of data centers. Since I'd mentioned and had drawn on work that Steve and Blanca Poteat had done, I'd intended to send it to them for their OK before sending to you. Instead, by accident, in going back up to the top for a re-read and editing, I hit *send*, forgetting I'd already addressed it to you. I can't undo the action, but I'll explain to them at once, along with a copy of what I've just sent you. Please take what I sent with a grain of salt; wait till you hear from the Poteats before giving it your full credence.

Embarrassed,
Nick

James, Karen

From: Adamstown Resident <residentadamstown@gmail.com>
Sent: Wednesday, July 23, 2025 7:05 PM
To: Planning Commission
Subject: Question

[EXTERNAL EMAIL]

Which part of the state did the planning commission send the request regarding the data centers today? At the meeting you all just said the State, which is vague.

When the Frederick County Planning Commission sends a data center plan to the State, it generally involves several Maryland state agencies, depending on the specific aspects of the project and its potential impacts. Here are the most likely state entities involved:

- 1. Maryland Public Service Commission (PSC):** This is a key agency when it comes to any large energy consumer, which data centers certainly are. The PSC regulates public utilities in Maryland, including electricity and gas. Historically, data centers needed a Certificate of Public Convenience and Necessity (CPCN) from the PSC for their backup generators, especially if they were large diesel generators. While recent legislation (like SB0474/HB0579) has eased some of these requirements, the PSC still plays a significant role in reviewing the energy demands, grid impact, and potential costs to ratepayers associated with such large loads. They would be concerned about the project's impact on the state's energy supply and infrastructure.
- 2. Maryland Department of the Environment (MDE):** Given the environmental concerns often associated with data centers (water usage for cooling, air quality from generators, potential stormwater runoff, and overall carbon footprint), the MDE would likely be involved. They would review permits related to air quality, water appropriations, wastewater discharge, and compliance with environmental regulations.
- 3. Maryland Department of Planning (MDP):** While local planning commissions handle the primary zoning and land use, the MDP offers statewide planning guidance, data, and analysis. They might review the plan for consistency with state land use policies, growth management goals, and demographic projections. They also coordinate the State Data and Analysis Center (SDAC), which tracks development trends.
- 4. Maryland Department of Commerce:** This agency is responsible for economic development and attracting businesses to Maryland. They would be interested in the data center project from an economic standpoint, as data centers often receive state tax incentives (like sales and use tax exemptions on equipment) to locate in Maryland. They would assess the project's potential for job creation (even if limited after construction) and tax revenue for the state.
- 5. Maryland Energy Administration (MEA):** The MEA focuses on energy policy, efficiency, and renewable energy. They would likely be involved in assessing the data center's energy consumption, its impact on Maryland's clean energy goals, and potential strain on the power grid. There's also legislation that has been proposed (like SB 116, mentioned in the search results) to specifically require analysis of data center impacts on energy by the MEA.

In summary, the "State" is not a single entity in this context. It's a collection of relevant state agencies, each with its specific regulatory purview and interest in how such a large development impacts their area of responsibility. The Frederick County Planning Commission would be sending the plan to initiate or continue the various state-level reviews and permitting processes required for a project of this scale and nature.

James, Karen

From: Christina Brockett <tina@eiwellness.com>
Sent: Wednesday, July 23, 2025 7:17 PM
To: Planning Commission
Subject: Fwd: Opposition to the Overlay

[EXTERNAL EMAIL]

Dear Planning Commission,

I am writing to register my opposition to the proposed overlay as communicated to the council.

Sincerely,

Christina Brockett

----- Forwarded message -----

From: Christina Brockett <tina@eiwellness.com>
Date: Wed, Jul 16, 2025 at 7:12 PM
Subject: Opposition to the Overlay
To: <councilmembers@frederickcountymd.gov>
Cc: Tom Brockett <twbrockett@aquamanswim.com>

Dear Council Members,

I am writing this letter in opposition to the current proposed overlay. The public has expressed many concerns that I also share, such as effects on water, potential adverse effects on property values, and loss of our agricultural heritage. However, as a healthcare provider, one of the biggest concerns I have is the apparent disregard for public health and well-being, specifically as it relates to air and noise pollution.

Data centers often utilize diesel generators as backup power sources, which emit substances such as particulate matter, volatile organic compounds, and nitrogen oxides. These substances are associated with respiratory issues, cardiovascular disease, and cancer. The Guardian's analysis shows these emissions may be 662% higher than initially reported, potentially exponentially increasing the risk of adverse health outcomes (O'Brien, 2024). This is consistent with a recent 2024 study which found that the pollutants associated the AI lifecycle could contribute to an annual public health burden of more than \$20 billion per year by 2030 and that "data centers could contribute to, among others, approximately 600,000 asthma symptom cases and 1,300 premature deaths" (Han et al., 2024).

The effects of pollution extend beyond just air pollution, but also include light pollution and noise pollution. Large cooling systems and generators produce low-frequency noise, which can also contribute to sleep disturbances, hypertension, stress, and, perhaps most notably with the proposed location, adverse cognitive and behavioral outcomes in children (Araújo Alves et al., 2020; Raess et al., 2022).

Other municipalities, including Washington State, require a health impact assessment before data center construction (Data Centers - Washington State Department of Ecology, n.d.). To my knowledge, Frederick County, specifically you as a council, has not mandated this nor conducted any detailed analysis when considering the expansion of the overlay, which allows it within 500 feet of residences and an elementary school.

Adamstown is a little over 1 square mile, or 678 acres, and represents a tiny fraction of Frederick County's 424,283 acres. While the current proposal seeks to limit data center development to less than 1% of the county's total land area, up to 4,200 acres, I must question why a community that represents .16% of the county must bear the burden, including the health risks, of nearly this entire defined maximum. This burden appears inequitable at best, with no positive outcome to the residents of the community.

As public officials, you have a mandate to act on behalf of the entire community equitably in a manner that does not impact the health and well-being of residents. The current proposed overlay contradicts this mandate, and I respectfully ask that you reconsider the expansion in the Adamstown community.

Sincerely,

Christina Brockett

References:

Araújo Alves, J., Neto Paiva, F., Torres Silva, L., & Remoaldo, P. (2020). Low-Frequency Noise and Its Main Effects on Human Health—A Review of the Literature between 2016 and 2019. *Applied Sciences*, 10(15), Article 15.
<https://doi.org/10.3390/app10155205>

Data centers—Washington State Department of Ecology. (n.d.). Retrieved July 16, 2025, from <https://ecology.wa.gov/air-climate/air-quality/data-centers>

Han, Y., Wu, Z., Li, P., Wierman, A., & Ren, S. (2024). *The Unpaid Toll: Quantifying the Public Health Impact of AI* (arXiv:2412.06288). arXiv.
<https://doi.org/10.48550/arXiv.2412.06288>

O'Brien, I. (2024, September 15). Data center emissions probably 662% higher than big tech claims. Can it keep up the ruse? *The Guardian*.

<https://www.theguardian.com/technology/2024/sep/15/data-center-gas-emissions-tech>

Raess, M., Valeria Maria Brentani, A., Flückiger, B., Ledebur de Antas de Campos, B., Fink, G., & Röösli, M. (2022). Association between community noise and children's cognitive and behavioral development: A prospective cohort study. *Environment International*, 158, 106961. <https://doi.org/10.1016/j.envint.2021.106961>

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Christina Brockett, MS, CNS, LDN

Integrative Clinical Nutritionist

15 North Court St, Suite 204, Frederick, MD 21701

Office: 301.874.2957

Fax: 240.222.1271

www.eiwellness.com



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James, Karen

From: Hope Green <hope.green76@yahoo.com>
Sent: Thursday, July 24, 2025 9:42 AM
To: Michael Kuykendall; Gary Cudmore
Cc: Council Members; Planning Commission; County Executive
Subject: Noise, disturbances Bauxite 1

[EXTERNAL EMAIL]

Good morning,

Last night I had to text Mike Bailey/Rowan about vibrating noise inside my house coming from B1. I could tell it was something to do with the new driveway/road. **It went on until 8:30pm.** Curfew is 7pm, isn't it?

He didn't get back to me until this morning to confirm it was a roller paving the new road between the main building and the berm.

I ask that you remind your contractors work stops at 7pm.

Last week it was an ear-piercing, screeching dozer.

I'm getting weary of the disturbances.

Regards,

Hope Green
5252 Mountville Rd

James, Karen

From: Gary Cudmore <gcudmore@rowan.digital>
Sent: Thursday, July 24, 2025 9:43 AM
To: Hope Green; Michael Kuykendall
Cc: Council Members; Planning Commission; County Executive
Subject: Re: Noise, disturbances Bauxite 1

[EXTERNAL EMAIL]

OK will talk to them

Sent from my Verizon, Samsung Galaxy smartphone

Get [Outlook for Android](#)

From: Hope Green <hope.green76@yahoo.com>
Sent: Thursday, July 24, 2025 6:42:08 AM
To: Michael Kuykendall <mkuykendall@catellus.com>; Gary Cudmore <gcudmore@rowan.digital>
Cc: Council Members <councilmembers@frederickcountymd.gov>; Planning Commission
<planningcommission@frederickcountymd.gov>; Jessica Fitzwater <countyexecutive@frederickcountymd.gov>
Subject: Noise, disturbances Bauxite 1

Good morning,

Last night I had to text Mike Bailey/Rowan about vibrating noise inside my house coming from B1. I could tell it was something to do with the new driveway/road. **It went on until 8:30pm.** Curfew is 7pm, isn't it?

He didn't get back to me until this morning to confirm it was a roller paving the new road between the main building and the berm.

I ask that you remind your contractors work stops at 7pm.

Last week it was an ear-piercing, screeching dozer.

I'm getting weary of the disturbances.

Regards,

Hope Green
5252 Mountville Rd

James, Karen

From: Shawn Brown <skb1214@gmail.com>
Sent: Thursday, July 24, 2025 10:44 AM
To: Planning Commission
Subject: Proposed Expansion for CDI Overlay Zone in Adamstown, MD

[EXTERNAL EMAIL]

Dear Planning Commission:

My name is Shawn and I'm writing to share my thoughts about the proposed data centers in Adamstown, MD. I'm asking that you please consider NOT expanding the CDI overlay zone out of the existing growth area. Please do not redraw the Rural Legacy Area or Priority Preservation Area to allow the expansion of the existing growth area. ANY expansion of the growth area will take from preservation areas and this will have a detrimental effect on the community.

We've seen the impacts that other counties locally have experienced, resulting in large scale environmental stress, public dissatisfaction and trust- all while generating MINIMAL long term economic or civic benefit. We deserve strong oversight measures. Frederick County is a beautiful place and has a strong agricultural base that deserves to flourish. It's important that we be stewards of the land for current and future generations.

By proactively addressing environmental, health, and infrastructure concerns, our community can safeguard its character and quality of life while still enjoying smart development.

Thank you for your time and consideration,
Shawn

James, Karen

From: Steve Poteat <cspoteat@gmail.com>
Sent: Thursday, July 24, 2025 3:25 PM
To: Planning Commission
Cc: Nick Carrera; bcspoteat@gmail.com
Subject: July 23, 2025 CDI Overlay Comprehensive Plan Amendment and Zoning Map Amendment
Attachments: 1-18-24 assumptions Sage report.docx

[EXTERNAL EMAIL]

Chairman Davis and Planning Commissioners,

I want to follow-up on my July 23 comments to the Commission on the Critical Digital Infrastructure discussion. My colleague Nick Carrera, in a July 23 email, referred to my work on cost-benefit analysis of the Quantum project, which I previously submitted to the Data Centers Work Group in January 2024. (See attached)

The most significant point regarding the Sage Policy Group report of October 2023, the so-called "Economic and Fiscal Impact of a Data Center Development in Frederick County," is that it only calculated tax revenue BENEFITS but no public COSTS of the planned 16 million square feet of industrial development projected to generate 6,300 continuing jobs (page 7) and \$41 million in real property and income tax revenue (page 10).

My analysis, using as sources FY24 Frederick County and FCPS operating budgets, focused on added school costs and other county costs generated by new households associated with those 6,300 jobs. Other county costs include water supply issues and infrastructure, roads, air quality, public safety, and noise control, as well as urgent electric power supply issues under state purview.

My analysis indicated that the county stands to lose more than \$30 million per year at Quantum buildout.

Please remember that only with the imposition of a Frederick County business personal property tax (similar to all surrounding counties) might this so-called "critical digital infrastructure" project begin to help cover its county costs.

Please remember, also, that the Quantum digital infrastructure will not improve internet services for county residents and the costs of any off-site electricity infrastructure improvements will be passed on to county residents and businesses.

For more than two years we have asked the county to undertake a more objective and comprehensive cost-benefit analysis of critical digital infrastructure development but no study has been forthcoming. I hope this brief analysis will encourage county government to undertake this study BEFORE taking final CDI actions.

The CDI decision facing you and Frederick County is the most important land use decision this county will decide and will shape other planning policies and practices going forward. It also has potential to

create the most significant economic drain on the county's future fiscal and environmental resources and well-being.

Steve and Blanca Poteat
Sugarloaf Mountain Road, Frederick County

REVISED... County to lose \$30.4 million per year at Quantum Loophole Buildout

The study, "The Economic and Fiscal Impact of a Data Center Development in Frederick County," October 2023, prepared by Sage Policy Group estimates the County revenues from the buildup of the Quantum Loophole complex of 16 million square feet of data centers in Adamstown.(Page 4) At build out the project will create 6,300 jobs in Frederick County on a continuing basis (Page 7) and \$41 million in revenues per year for Frederick County.(Page 10) **THE SAGE REPORT MAKES NO EFFORT TO PROJECT THE PUBLIC COSTS TO FREDERICK COUNTY FOR SCHOOLS AND OTHER PUBLIC SERVICES CREATED BY THOSE 6,300 JOBS. THOSE 6,300 JOBS WILL CREATE A DEMAND FOR \$71.4 MILLION IN SERVICES. QUANTUM LOOPHOLE WILL ONLY PRODUCE \$41 MILLION IN REVENUE. THIS LEAVES A DEFICIT FOR FREDERICK COUNTY TO FUND OF \$30.4 MILLION ANNUALLY.**

Assumptions for annual costs to County from Quantum Loophole buildout

1. County population: 263,900
2. Total County employment: 123,200
3. Persons per job: 2.1 (263,900 population divided by 123,000 jobs)
4. County government operating budget FY 24 : \$892,000,000 minus transfer to Frederick County Public Schools(FCPS) of \$400,000,000 equals remainder of \$492,000,000
5. Cost of County services per capita: \$492,000,000 divided by 263,900 people equals \$1846
6. FCPS FY24 operating budget: \$910,000,000 including cost of transfer from County.
7. Students in FCPS: 45,220
8. Cost of students per capita: \$910,000,000 divided by 45,220 students equals \$20,124 per student
9. Current students per job: 45,220 students divided by 123,200 jobs equals 0.37 students per current job
10. Continuing jobs at Quantum Loophole buildup equals 6,300 (Sage) times 0.37 (students per job) equals 2331 new students.
11. Cost of new students: 2331 new students times of \$20,124 (per student costs) equals \$46,909,044, about \$47 million
12. Total new residents per new job: 6,300 new jobs times 2.1 persons per job equals 13,230 new residents
13. County services cost:13,230 new residents times per capita costs of County services of 1,846 equals \$24,422,580, about \$24.4 million
14. Total County and FCPS cost for 6300 continuing jobs at Quantum Loophole buildup: \$47 million plus \$24.4 equals \$71.4 million annually
15. Quantum Loophole added revenue annually (Sage): \$41million
- 16. Annual County deficit resulting from Quantum Loophole jobs: \$71.4 million minus \$41 million equals \$30.4 million**

Sources

1. The Economic and Fiscal Impact of a Data Center Development in Frederick County, Sage Policy Group, October 2023
2. Frederick County MD operating budget FY 2024
3. FCPS operating budget FY 2024

James, Karen

From: Steve Black <steveblack2313@gmail.com>
Sent: Thursday, July 24, 2025 5:35 PM
To: County Executive; Council Members; Planning Commission
Subject: FW: Data center power demands drive record power auction prices with varying impacts on Maryland customers

[EXTERNAL EMAIL]

County Executive, Council Members, and Planning Commissioners:

I want to share this recent report from the Maryland Office of People's Counsel.

OPC's analysis shows that most residential electricity users in Frederick County will see a \$250/year increase in their electric bills because of data centers in VIRGINIA.

When the full Quantum Maryland site comes online and needs the same amount of power as TWO BALTIMORES what do you think will happen to the PJM cost allocations? Spoiler ... electric bills will not go down.

Every residential rate payer is going to pay a "tax" (via their electric bill) so that the county can get more real estate tax revenue.

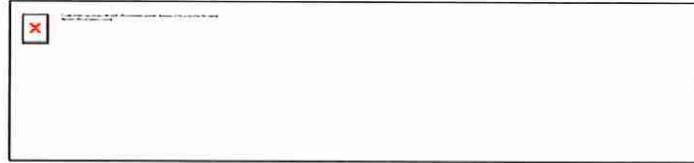
Don't you think this should be factored into the data center cost / benefit analysis?

Steve Black
Adamstown

<https://content.govdelivery.com/accounts/MDOPC/bulletins/3ead2f8>

From: OPC Press Release <OPCPressRelease@public.govdelivery.com>
Sent: Thursday, July 24, 2025 1:47 PM
Subject: Data center power demands drive record power auction prices with varying impacts on Maryland customers

Having trouble viewing this email? [View it as a Web page](#).



FOR IMMEDIATE RELEASE

July 24, 2025

Contact:

Lori Sears

lori.sears@maryland.gov

410-767-8172

Data center power demands drive record power auction prices with varying impacts on Maryland customers

BALTIMORE – Many Maryland households are likely to see costs slightly increase for the 2026/2027 delivery year—on top of the 2025/2026 delivery year's much more substantial increases from the 2024/2025 delivery year—but customers of Baltimore Gas and Electric could see slight bill decreases after accounting for certain credits, following the regional power system operator's (PJM) capacity market auction released this week. (See bill impact details below.)

The auction, which is designed to ensure reliable electric service across the region for the year starting June 1, 2026, set an all-time record high clearing price of \$329 per megawatt-day, up from last year's PJM-wide capacity auction clearing price of \$270/MW-day, which itself was a nine-fold increase from the previous year and will affect utility bills this year.

“The auction results further demonstrate the extraordinary costs being imposed on Maryland residential customers to support the massive power demands of data centers—mostly located outside of Maryland,” said Maryland People’s Counsel David S. Lapp. “Residential customers are not causing these excessive costs and should not be paying for them.”

Several changes to the capacity market auction rules—advocated for by the Office of People’s Counsel—helped increase the amount of electric supply bidding into the market, but those increases were still insufficient to offset increases in demand. Most increases in demand originated from data centers, totaling more than 5,400 MW of increased demand from the level of demand that cleared just one year ago. The price cleared at a “cap” resulting from the settlement of a complaint brought by Pennsylvania, which was supported by Maryland Governor Wes Moore, other governors in PJM, [OPC](#), and other state consumer advocates. The clearing price would have been \$389/MW-day without the cap.

Despite improvements in last year’s auction rules, which artificially restricted supply included in the auction, PJM’s rules still understate the amount of supply available in the region, according to [a pending complaint filed by OPC](#) now before federal regulators.

For the first time in several years of capacity market auctions, the price for the BGE zone cleared at the same price as the overall PJM regional price, due to including the Brandon Shores and Wagner (so-called reliability must-run or RMR) power plants near Baltimore as supply in the auction. Those plants were excluded from last year’s auction, driving the auction results up by as much as \$5 billion, according to an [OPC report](#) released last August. Following that auction, OPC [called on PJM](#) to account for those units in the auction. PJM [initially called the request](#) “counterproductive,” but, under significant pressure, eventually changed course for future auctions. OPC has [filed a complaint](#) with federal regulators challenging last year’s auction results and seeking refunds for customers.

The extraordinary costs from PJM’s capacity market auctions are just one category of costs that data centers are imposing on residential customers. Data centers also increase energy costs and transmission costs for Maryland customers. Maryland customers are unfairly being required to pay hundreds of millions of dollars for transmission projects that are driven by data center load growth occurring in Northern Virginia, according to [several OPC filings](#) before federal regulators.

“We are witnessing a massive transfer of wealth from residential utility customers to large corporations—data centers and large utilities and their corporate parents, which profit from building additional energy infrastructure,” Lapp said. “Utility regulation is failing to protect residential customers, contributing to an energy affordability crisis.”

Lapp authored an [opinion piece](#) published this week explaining how PJM has wrongly blamed the State for increased costs. Lapp’s piece explains the need for PJM leadership changes that will tackle the data center problem and other issues.

* * *

The chart below shows initial estimates of the impacts of the July 2025 capacity market auction for the energy delivery year June 1, 2026, to May 31, 2027, relative to last summer’s auction (delivery year June 1, 2025, to May 31, 2026) and the previous auction (delivery year June 1, 2024, to May 31, 2025). The impacts will be reflected on

customer bills next year. The results are rough estimates and depend on the level of customer energy consumption. The exact timing of the increases will depend on regulatory decisions about when the wholesale costs are approved to be included in retail rates.

Estimated Maryland Residential Monthly Bill Increases From July 2025 Capacity Market Auction for 2026/2027 Delivery Year

	Cumulative impact of last two capacity auctions (increase from 2024/2025 delivery year)	Impact of most recent capacity auction (increase from 2025/2026 delivery year)
Baltimore Gas and Electric	\$16.49	\$0.83
<i>After credits (see explanation below)</i>		(-\$3.36)
Pepco (Maryland) and SMECO	\$17.68	\$3.34
<i>After credits (see explanation below)</i>		\$2.50
Delmarva Power (Maryland)	\$10.43	\$5.24
Potomac Edison (APS-Maryland)	\$20.81	\$3.21

The table above shows the capacity market auction clearing price increases. Some Maryland customers, however, will receive a credit that reduces their bill as a result of rule changes related to payments for RMR units. Specifically, BGE and Pepco customers will see their capacity market cost increases wholly or partially offset. We estimate BGE customers will see an average credit-related reduction of approximately \$4.20/month and Pepco customers \$0.85/month for 2026/2027 delivery year. This means that, overall, for costs related to the capacity market increases and RMR credits, BGE customers will see an estimated bill decrease of \$3.36/month, and Pepco customers an increase of \$2.50/month. The rule changes were urged by OPC and others and adopted by PJM.

The bill-increase impacts from the most recent capacity market auction are lower in BGE's service territory than those in other utility service territories because BGE's customers already were paying higher capacity market prices. Last year, the BGE zone's price was \$466/MW-day compared to the regionwide clearing price of \$270/MW-day. Although the clearing price for this month's auction for the BGE zone (\$329/MW-day) is less than last year's clearing price for the BGE zone, the BGE zone receives credits related to imports of lower cost power, bringing the capacity cost from the last auction to the BGE zone down to \$307/MW-day, less than the current auction's clearing price.

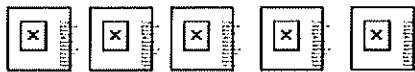
The Maryland Office of People's Counsel is an independent state agency that represents Maryland's residential consumers of electric, natural gas, telecommunications, private water and certain transportation matters before the Public Service Commission, federal regulatory agencies and the courts.

* * *

6 St. Paul Street, Suite 2102
Baltimore, Maryland 21202

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For more options, visit <https://groups.google.com/d/optout>.

James, Karen

From: Nick Carrera <mjcarrera@comcast.net>
Sent: Thursday, July 24, 2025 9:33 PM
To: Steve Poteat; Planning Commission
Cc: bcpoteat@gmail.com
Subject: Re: July 23, 2025 CDI Overlay Comprehensive Plan Amendment and Zoning Map Amendment

[EXTERNAL EMAIL]

Good going, B&S Analytic Services!!!

Nick

On 7/24/2025 3:24 PM, Steve Poteat wrote:

Chairman Davis and Planning Commissioners,

I want to follow-up on my July 23 comments to the Commission on the Critical Digital Infrastructure discussion. My colleague Nick Carrera, in a July 23 email, referred to my work on cost-benefit analysis of the Quantum project, which I previously submitted to the Data Centers Work Group in January 2024. (See attached)

The most significant point regarding the Sage Policy Group report of October 2023, the so-called "Economic and Fiscal Impact of a Data Center Development in Frederick County," is that it only calculated tax revenue BENEFITS but no public COSTS of the planned 16 million square feet of industrial development projected to generate 6,300 continuing jobs (page 7) and \$41 million in real property and income tax revenue (page 10).

My analysis, using as sources FY24 Frederick County and FCPS operating budgets, focused on added school costs and other county costs generated by new households associated with those 6,300 jobs. Other county costs include water supply issues and infrastructure, roads, air quality, public safety, and noise control, as well as urgent electric power supply issues under state purview.

My analysis indicated that the county stands to lose more than \$30 million per year at Quantum buildout.

Please remember that only with the imposition of a Frederick County business personal property tax (similar to all surrounding counties) might this so-called "critical digital infrastructure" project begin to help cover its county costs.

Please remember, also, that the Quantum digital infrastructure will not improve internet services for county residents and the costs of any off-site electricity infrastructure improvements will be passed on to county residents and businesses.

For more than two years we have asked the county to undertake a more objective and comprehensive cost-benefit analysis of critical digital infrastructure development but no study has been forthcoming. I hope this brief analysis will encourage county government to undertake this study BEFORE taking final CDI actions.

The CDI decision facing you and Frederick County is the most important land use decision this county will decide and will shape other planning policies and practices going forward. It also has potential to create the most significant economic drain on the county's future fiscal and environmental resources and well-being.

Steve and Blanca Poteat
Sugarloaf Mountain Road, Frederick County

James, Karen

From: Robin Todd <robintodd1948@gmail.com>
Sent: Friday, July 25, 2025 8:07 AM
To: Planning Commission
Subject: Expansion of area used for data centers

[EXTERNAL EMAIL]

Dear Planning Commissioners,

On behalf of the Maryland Ornithological Society (MOS), I write to ask you to limit the area of the County in which data centers will be permitted. Specifically, we urge the Commission to:

- i) avoid expanding the overlay zone beyond the existing growth area and,
- ii) not redraw the Rural Legacy Area or the Priority Preservation area to allow expansion of the present growth area/CDI overlay zone.

Building data centers will result in the loss of much open country, land that various species of grassland birds depend upon. This group includes the American Kestrel, Eastern Meadowlark, Field and Grasshopper sparrows. A landmark publication by Rosenberg et al (2019) found that North America had lost about 3 billion birds (about 30% of its total population) between 1970 and 2019. Grassland birds were the group which had suffered the greatest declines; they can ill afford further habitat loss such as encroachment by data centers.

Expansion of the area used for data centers will also result in additional stress on the water table, harming nearby agricultural operations.

MOS was founded in 1945 and is an all-volunteer non-profit organization with about 2000 members and with 15 chapters throughout the state. Our mission is to study, conserve and enjoy wild birds and their habitats, with special emphasis on birds which spend at least part of their lives in our state. We hold bird walks, host lectures on bird-related topics, have a very active youth group, hold an annual convention and own 10 sanctuaries scattered throughout the state (all are open to the public at no charge).

Yours sincerely,

Robin G. Todd PhD
Chair, Conservation Committee
Maryland Ornithological Society
www.mdbirds.org
410-491-5333

Reference Cited:

Rosenberg, Kenneth V. et al, Decline of the North American avifauna, Science, VOL 366, NO. 6451, 19 September 2019,

https://www.science.org/doi/10.1126/science.aaw1313?adobe_mc=MCORGID%3D242B6472541199F70A4C98A6%2540AdobeOrg%7CTS%3D1707754028

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James, Karen

From: Helen Josephson <hkjosephson@comcast.net>
Sent: Friday, July 25, 2025 9:50 AM
To: Planning Commission
Cc: Planning Commission
Subject: Data centers

[EXTERNAL EMAIL]

While many steps are being taken to help Frederick County, Adamstown residents are taking the brunt of the fallout from these data centers. Ideas like saving land elsewhere in the county for what is taken from Adamstown in no way helps us. Pulling the overlay slightly back from Carroll Manor Elementary and Green Hill Manor homes does not mitigate the noise and air pollution they will experience. We do not know the fallout of the centers that are currently being built. Why are you already facilitating the addition of more?

This is shared information pertaining to the negative affects of data centers on local populations: The experience for those living directly next to these facilities can be starkly different and negatively impact their quality of life and, potentially, their home's market appeal and appreciation rate.

Here are more details on the quality-of-life impacts for individual homeowners immediately adjacent to large data centers in Loudoun County, VA:

1. Unrelenting Noise Pollution:

Constant Drone: The most frequently cited complaint is a persistent, low-frequency hum or drone from the cooling fans and HVAC systems that operate 24/7. Residents describe it as sounding like a "propeller," a "loud drone hovering," a "big fan," or even a "freight train" or "airplane engine."

Temperature Sensitivity: The noise can intensify significantly with temperature drops, peaking when it's around 50 degrees Fahrenheit, as the fans work harder to bring in cooler air. This means the sound can be worse during cooler months or at night.

Penetration and Inescapability: This artificial noise is often described as "going through walls" and being heard even with windows closed. Unlike typical neighborhood sounds (like lawnmowers), it's constant, providing no escape.

Health and Well-being Impacts: The continuous noise leads to:

Sleep Disturbances: Residents report difficulty sleeping, sleep deprivation, and being woken up in the middle of the night.

Anxiety and Stress: The invasive nature of the sound can cause anxiety and affect mental well-being and productivity.

Reduced Enjoyment of Home: People may avoid spending time outdoors (e.g., in backyards, gardens) or even in certain parts of their homes where the noise is most audible. Some homeowners have resorted to using white-noise machines or even living in their basements to escape the sound.

2. Significant Visual Blight and Industrialization of Residential Areas:

Massive Structures: Data centers are large, often multi-story (now up to three stories), warehouse-like buildings, typically with few windows. Their sheer scale can dwarf nearby residential homes.

Loss of Aesthetic Appeal: For homeowners who invested in areas for their suburban or semi-rural character, the sudden appearance of these industrial behemoths can drastically alter the visual landscape, replacing green spaces or open views with concrete and steel.

Ancillary Infrastructure: The data centers require massive electrical infrastructure, including new, tall high-voltage transmission lines and large substations. These can be visually intrusive, further industrializing the immediate vicinity and potentially cutting through areas once envisioned as open space or residential. One case saw a substation proposal rejected due to its location directly across from newly built residential neighborhoods, highlighting the visual and community impact.

3. Construction Impacts and Lingering Effects:

Blasting and Damage: During the construction phase, blasting for data center projects has been reported to cause physical damage, such as cracked drywall in nearby homes.

Ongoing Disruption: Construction can bring additional noise, dust, and traffic for extended periods.

4. Financial and Market Appeal Challenges:

Reduced Buyer Pool: The quality-of-life issues (noise, visual intrusion) can make homes directly adjacent to data centers less appealing to a broad segment of homebuyers who prioritize peace, quiet, and residential aesthetics. This can narrow the pool of potential buyers.

Slower Appreciation or Stagnation: While county-wide values may rise, homes directly affected by these negative externalities might see a slower rate of appreciation or even stagnation compared to similar homes not impacted. One resident expressed waiting for mortgage rates to drop to sell, stating, "If I would have known what I was walking into a few years back, I would not have chosen this place." This implies a perceived reduction in value or desirability after experiencing the impact.

Investment in Mitigation: Some homeowners have spent significant money (e.g., \$17,000 on soundproof windows) in attempts to mitigate the noise, sometimes with limited success, adding an unexpected financial burden.

"Not a Good Quality of Life": This sentiment directly impacts market appeal. When residents feel their quality of life is severely diminished, they are more likely to want to move, and new buyers are more likely to be deterred, affecting demand and ultimately price.

In essence, while data centers provide significant economic benefits and tax revenue to Loudoun County, the brunt of the negative quality-of-life impacts falls disproportionately on those homeowners who find themselves living immediately next to these industrial-scale facilities. This can translate into real challenges in terms of enjoying their homes and potentially realizing the same level of property value appreciation as other areas within the county.

Please consider people before profit and how we are losing natural resources that make our county unique. We do not want to follow in Loudoun County's footsteps.

Helen Josephson

James, Karen

From: Julien Libert <j.r.libert.a@gmail.com>
Sent: Saturday, July 26, 2025 8:28 AM
To: Planning Commission
Subject: Comments: Concerns About Data Center Proposed Map

[EXTERNAL EMAIL]

Good morning,

Thank you for your continued diligence in planning for data centers in Frederick County. My position aligns with the Sierra Club of Maryland Catoctin Group as well as Stop MPRP. Please push hard for the alternatives proposed by these groups and others for very limited or no expansion of the current acreage for data centers and for more efficient and less disruptive energy transmission. Transmission efficiencies should be achieved through reconductoring existing power lines, Grid-Enhancing Technologies (GETs) like dynamic line ratings, advanced battery storage solutions, High-Voltage Direct Current (HVDC) technology, and micro grids. The bill for this should be footed in most part by the data centers and not the ratepayers. Data center development should be predicated on available electric load. This may ultimately mean that development should occur in industrial lots in cities outside of Frederick County. Thank you.

Julien Libert
1215 Staley Ave
Frederick, MD 21701

James, Karen

From: Maggie Long <mslong315@gmail.com>
Sent: Sunday, July 27, 2025 10:39 AM
To: Planning Commission
Subject: CDI expansion area in Adamstown

[EXTERNAL EMAIL]

Hello,

I am a concerned citizen of Adamstown and I want to give my feedback on expanding the area of CDI. It is not fair to put the weight of the county on Adamstown. The fertile land is important. Don't sell us out for money. It will impact our lives here. Please do not expand.

Maggie Long

Sent from my iPhone

James, Karen

From: Darren Andrews <Darren@talon-construction.com>
Sent: Monday, July 28, 2025 8:16 AM
To: Planning Commission
Subject: Critical Digital Infrastructure Meeting

[EXTERNAL EMAIL]

Good morning,

As a child, I grew up in downtown Adamstown. I have fond memories of the yearly carnivals, firemen's softball games, bailing hay, and the farmlands. Obviously, I have seen a lot of growth. No more carnival grounds, no more firemen's softball games, and disappearing farmlands. I work in the construction field, so I'm not afraid of construction and to a point..... welcome it. I wasn't a big proponent of the data center, but given all the options, it was probably the best choice.

Having said all of this, I would like to my opinion be made known that I am 100% against expanding the critical digital infrastructure overlay zone outside of the existing growth area. Furthermore, I am against redrawing any Rural Legacy Area or Priority Preservation Area lines period.

These lines were drawn for a reason: To Preserve the Ruralness of this picturesque community and to preserve the fertile grounds for any remaining or future farming endeavors. I humbly ask that the powers to be keep this in mind as they discuss this matter in the upcoming meeting.

Thank you,

**Darren Andrews, Certified Graduate Remodeler (CGR)
Remodeling Consultant / Estimator
State of MD - Master Plumber**

Talon Construction, Inc.
302 East 4th Street
Frederick, MD 21701
P-301-620-8604 x202
Email: darren@talon-construction.com
Web: www.talon-construction.com



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