

From: [Annmarie Winkler](#)
To: [Planning Commission](#); [Council Members](#); [County Executive](#)
Date: Tuesday, October 14, 2025 10:20:34 AM

[EXTERNAL EMAIL]

To whom it may concern,

I am completely opposed to expanding the zone for data centers beyond the East Alcoa site. I can understand that the soil at the East Alcoa site is not desirable for residential use, but please do not expand the zone to go beyond the existing area. I am concerned with the size of the data center zone because 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.

While I also understand that data centers are crucial for our digital world, data centers have significant drawbacks. I am afraid over time that the Adamstown communities near these large data centers will have noise/health concerns and overall property value depreciation. This is a radical change for the Adamstown area, and I am sure you have heard the complaints these data centers are causing in Loudoun County.

Why not wait until we see the impacts of this first stage of data center development on the East Alcoa site before expanding into the overlay area? There is no rush to make this decision now. The land will always be there and available for additional development later. Since the start of construction, the sites have racked up well over 100 major environmental violations. This initial East Alcoa site already has its own set of problems and can only get worse with no restrictions, no monitoring, and no consequences for their violations. **Please wait on making this major decision of expanding the zone until we see what effects these data centers that are already being built have on the communities nearby and Frederick County overall.**

From: allygatorebay@yahoo.com
To: [Planning Commission](#)
Cc: [County Executive](#); [Council Members](#)
Subject: Not approving the Overlay
Date: Tuesday, October 14, 2025 1:06:22 PM

[EXTERNAL EMAIL]

Good Afternoon Planning Commission,

I have been to all the meetings and still have not heard why this Overlay is needed and why it is being rushed to get done.

The hurtful impact to Adamstown is already so great from the ongoing development, and now you want to make it worse?

There have been 100's of environmental violations, and dozens of concerns raised from the current construction, and now the County wants to expand more. It seems to me that the negative effects are far greater then anything positive, so why rush to expand for more problems?

I would like the proposal for the overlay to be defeated. We have time to wait and see what currently happens first. It can always be reconsidered down the road.

Sincerely,

Ally, Adamstown resident

From: peterblood3213@comcast.net
To: [Planning Commission](#)
Subject: Request for Caution on Data Center Expansion
Date: Tuesday, October 14, 2025 1:26:48 PM

[EXTERNAL EMAIL]

Dear Commissioners,

I write with a simple and urgent message regarding data center expansion in Frederick County.

The county is on the verge of hosting one of the largest data center complexes in the United States — potentially two dozen hyperscale facilities — despite having no prior experience with this industry. Challenges and problems are inevitable.

The question now before you is whether Frederick County should move forward with plans to further expand this number — possibly doubling it — before we've even seen the results of the initial buildout.

A reasonable, responsible course of action would be to pause and evaluate how the Eastalco project unfolds. Let us first learn from the early stages, identify any mistakes or unforeseen impacts, and make adjustments before committing to further expansion.

In short: **wait and see**. It only makes sense to understand the consequences of our first steps before taking bigger ones.

In the meantime, I urge you to press the County Council to commission a thorough, independent cost-benefit analysis of data center development in Frederick County.

The Sage report is inadequate — it only considered potential benefits while completely ignoring the costs. A one-sided study cannot serve as the basis for sound decision-making.

Thank you for your consideration.

Peter Blood
Urbana, MD

From: [Darlene Brown](#)
To: [Planning Commission](#)
Subject: Vote No to Expanding the Zoning for Data Centers
Date: Tuesday, October 14, 2025 12:24:50 PM

[EXTERNAL EMAIL]

Dear Planning Commission,

As a resident of Adamstown Maryland, I urge you not to expand the zone for data centers. I have lived in Adamstown since December 1999 and have loved living in the country. I realize that data centers are now a part of our community and we cannot stop what has already been approved. However, I am very concerned about expanding the Eastalco Growth Area, and an expansion of the area available to data centers. It will be a dramatic change to the environment, our views and the way we live. We have a precious resource, our agricultural farm land and we need to keep it. Once a change is made there is no going back to the way it was. That has been proven. Frederick county is growing at a rapid pace, just look at the amount of residential growth that is happening. We can't keep up with the roads to handle all of this. Frederick county is losing its charm.

My concerns regarding the data center include the following:

- Eliminating almost 1,000 acres of farmland. This area is prime agricultural land, which has been designated as either the County Priority Preservation Area or the State Rural Legacy Area, or in some cases both. Now you are considering taking that away. Why Change? And Why Now?
- What is the economic benefit of increasing the Eastalco Growth Area? I have not seen or heard how Adamstown or Frederick County will benefit from the current approved data centers let alone what additional ones.
 - How will this impact the value of my home? I know of two people who are looking to buy a home in Frederick County and would love to live in Adamstown and the data centers and power lines are keeping them from looking here. I don't blame them. I would not buy here now and worry about my home's value if I need to sell.
 - How will they be taxed?
 - How will the expansion benefit the community of Adamstown and Frederick? Share that with us.
 - I would like to come to a meeting regarding these data centers where someone explains/shares how this expansion will benefit us as a community.
- What is the true environmental impact of data centers – I love sitting on my front porch taking in the views and enjoying the peace and quiet. I hear the construction noise now at the data centers site. It makes me realize how close we are to the site and makes me nervous when they are all up and running. How do you disguise the noise of diesel generators? I spend hours outside, walking, gardening, etcs. That is why I chose to live in the country. I don't want to be house bound.
- How will this expansion of data centers and the current data centers under construction impact our electrical demands and water service the current data center and any expansion? We don't know. So why expand now?

- My electric bills this past winter were some of the highest I have experienced each month. What will happen when the data centers are up and running? And if there is an expansion of data centers. Why now?
- High on my list of concerns is my well water and the risk of contamination – I heard there is well contamination in the area so I need to test again. Who will cover the cost if my well is contaminated from the current data centers and any future expansion of data centers.
- What/who will have priority for water/electrical resources? The data centers or the residents?
 - We are continuing to experience drought conditions every year? This year was much worse for Adamstown. The last two summers have been extremely hot and we (in Adamstown) went weeks without rain. I am aware that the data centers will use gray water, but when drought conditions extend year after year, when water consumption is restricted and there is less gray water, what happens then.

As you can see, I am concerned about the expansion of zoning for data centers for numerous reasons. Again, I urge you not to approve the expansion for data centers. You and I don't know the full impact and won't know for many years to come. So why are we leaping to expand the zoning for data centers. We can't take it back.

Adamstown is a great community and its residents deserve to have their concerns heard. Our environment and lives will be impacted by your decision, so please do not disregard our concerns... they are real. Please Vote NO to expansion of zoning for data centers.

Sincerely,
Mary Brown
5507 Doubs Rd
Adamstown, MD 21710
240-315-1742

From: [McKay, Steve](#)
To: [Planning Commission](#)
Subject: FW: CDI overlay
Date: Tuesday, October 14, 2025 4:44:54 PM
Attachments: [CDI Overlay Letter 10.9.pdf](#)

FYI – this letter should've gone to the Planning Commission.

From: David Burrier <burrierfarmsred@gmail.com>
Sent: Friday, October 10, 2025 7:38 AM
To: Council Members <CouncilMembers@FrederickCountyMD.gov>
Subject: CDI overlay

[EXTERNAL EMAIL]

Sent from my iPad



“The Voice of Organized Agriculture”

October 1, 2025

Dear Frederick County Planning Commission,

Frederick County Farm Bureau has several strong concerns that we feel need your utmost attention regarding the proposed Critical Digital Infrastructure Overlay map. One of our concerns with the overlay map lie with the boundaries of State certified Priority Preservation Areas (PPI) which will require recertification of Frederick County's agricultural preservation programs. Frederick County's certification could come under review and reduce our percentage of transfer tax from 75% to 35%. The transfer tax funding is more important to Frederick County Land Preservation than ever before since the state ag preservation program (MALPF) was greatly reduced last year to meet state budget shortfalls.

Frederick County Farm Bureau does not support any rezoning of agricultural land to Limited or General Industrial outside the Comprehensive Plan Growth Area. Outside the Comprehensive Growth Plan lies Rural Legacy areas as well as Priority Preservation Areas. Any expansion of existing industrial zoned land will fragment out the Rural Legacy Area. The Carroll Manor Rural Legacy Area was created with the intention to protect farmland, historical locations and the abundant natural resources of this area of Frederick County.

The farmland outside the growth area is home to some of the highest quality soils in Frederick County. The Rural Legacy and Priority Preservation Areas were created to protect contagious tracts of land to enhance natural resources, and give agricultural and forestry land environmental protection. These affected soils cannot be duplicated anywhere else in Frederick County and need to be preserved and protected.

As this project moves forward in our county, please consider the consequences of Frederick County losing its eligibility of revenue for our farmland preservation from the State agricultural transfer taxes. Frederick County agriculture is currently challenged with many demands for farmland acres today and the loss of more preservation funds will limit the future of our industry forever.

Respectfully,

A handwritten signature in black ink that reads "David Burrier".

David Burrier
President, Frederick County Farm Bureau

From: darth44ebay@yahoo.com
To: [Planning Commission](#)
Cc: [Council Members](#); [County Executive](#)
Subject: Please give Adamstown residents a voice
Date: Tuesday, October 14, 2025 11:56:49 AM

[EXTERNAL EMAIL]

5 years ago we were promised that the current East Alcoa land development was the only portion of land being considered for Frederick County growth, and that would be it. As we feared, it is now expand, expand, expand, and the current area is not even operational. Now, they want more land, lose more farming, and less old Adamstown. If you think the County is going to stop after this expansion then I think you are mistaken.

The Frederick County Council and Executives do not care for Adamstown residents. Their only response to our concerns is to not vote for them (Brad Young's words).

Please back up the residents of Adamstown and protect what makes us Adamstown.

Thank you,
Long time Adamstown Resident

From: [dylan mendes](#)
To: [Planning Commission](#); [Council Members](#); [County Executive](#)
Subject: Oppose Expansion of the Critical Digital Infrastructure (CDI) Overlay – Protect Southern Frederick County's Character and Future
Date: Tuesday, October 14, 2025 10:33:22 AM

[EXTERNAL EMAIL]

Dear Members of the Planning Commission, County Council, and County Executive,

I am writing to urge you not to expand the Critical Digital Infrastructure (CDI) Overlay Zone in southern Frederick County. Although I no longer live in the county, I have deep roots here and continue to work in Frederick. The community's future — its balance between economic opportunity, livability, and environmental responsibility — remains important to me both personally and professionally.

While I understand that this hearing is not about whether data centers should exist in the county, expanding the designated zone represents a major change in scale, impact, and intent. It's a shift that risks erasing the very qualities that have made southern Frederick County such a desirable and sustainable place to live and work.

Several issues in the proposed expansion give me serious pause:

- No clear economic justification. There is still no independent, data-driven analysis showing that expanding the Eastalco Growth Area for additional data centers would produce net public benefit. Residents deserve transparent answers about the true costs — from infrastructure investments to potential declines in nearby property values and increases in energy costs.
- Loss of prime farmland. Nearly 1,000 acres of high-quality agricultural land within Priority Preservation and Rural Legacy areas would be converted for industrial use. This contradicts the county's long-held commitment to farmland protection and undermines state preservation goals.
- Ongoing environmental violations. The current Eastalco data center complex has already been cited for numerous environmental infractions and remains under investigation. Expanding the footprint before existing oversight and compliance issues are resolved would be reckless.
- Unresolved energy and climate impacts. The existing development's energy demand — reportedly equivalent to two entire cities — raises serious questions about power sourcing, grid reliability, and consistency with Frederick County's climate and sustainability commitments. Adding another 1,000 acres would only amplify those pressures.

Southern Frederick County's rural and small-town communities — from Adamstown to Buckeystown to Point of Rocks — are already carrying the weight of rapid change. Residents are not opposed to progress, but they expect thoughtful, transparent planning rooted in evidence, not speculation.

I urge you to reject the proposed expansion of the CDI Overlay Zone and instead prioritize a comprehensive economic and environmental review before any further changes are considered. The decisions made now will shape Frederick County's landscape, economy, and

identity for decades to come.

Thank you for your time, public service, and thoughtful consideration of this critical issue.

Sincerely,

Dylan Mendes

Senior Application Developer | [LinkedIn](#)
[+1 \(240\) 855-9083](tel:+12408559083) | mendesdylan02@gmail.com

From: [Alice Wilson](#)
To: [Alice Wilson](#)
Cc: [James Baker - HCC](#), [Alice Lisa - HCC](#), [Steve Black - Council Member](#), [Planning Commissioner](#), [County Executive](#), [Bookkeeper](#), [Barbara \(Health/Admistrative\)](#)
Subject: Re: Dot - Quantum Site
Date: Tuesday, October 14, 2025 11:29:18 AM

[EXTERNAL EMAIL]

So those dust pictures they violated more after the order from MDE?

On Tue, Oct 14, 2025 at 10:38 AM Heng Guan <heng_guan76@yahoo.com> wrote:

[1] On Tues, Oct 14, 2025 at 10:38 AM Hope Green <hopegreen76@yahoo.com> wrote:

Attached is copy of letter from MDE to Catellus regarding issues with construction dust at Quantum. Alyse Wilson has photos. Dust issues only got worse after the letter went out, like they totally ignored it. Got so angry that I sent an email to Anu Mohanty/MDE 9/17 saying how horrific the dust had become. Messaged the Governor as well.

Silica, asbestos, and heavy metals

Dangers of Construction Dust from Superfund Sites

The dangers of construction dust from Superfund sites are significant, as it can lead to serious health risks for both workers and the surrounding community. The dust can contain harmful substances such as silica, asbestos, and heavy metals, which can cause respiratory diseases, lung cancer, and other long-term health issues. Proper safety measures and protective equipment are essential to minimize exposure and protect health.

Hope Green
5252 Mountville Rd
Adamstown, MD 21710
301-943-1915

From: [Edna Howard](#)
To: [Planning Commission](#); [Council Members](#); [County Executive](#)
Subject: NO to Adamstown Expansion
Date: Tuesday, October 14, 2025 1:46:22 PM

[EXTERNAL EMAIL]

Good afternoon,

I am writing to inform you that I am opposed to the expansion of the data centers, beyond the East Alcoa site.

I don't know how you expect the small town of Adamstown to handle the potential for additional data centers and added stress of an electrical grid being built across the County to accommodate it. Of course the other County's are not opposed to it - because it is not going in "their backyard." This is not a smart move for Frederick County and Adamstown. You're not listening and don't care about the people of Adamstown and Buckeyestown who have voiced their concerns and made it clear that it is a hinderance to their daily

living and property values. We are the ones who have to live with the consequences. Who do we complain to in 10-20 years when this is a problem that you didn't acknowledge at the beginning?

Leave things how they are and let's see what these effects are from the data centers that are already being built on the East Alcoa site before expanding onto the green areas outside of that. It is smart to see the effects of what's being done before granting access to more without knowing the results.

Please reconsider granting the expansion.

Why not rezone it for stores or housing instead of industrial?

Sincerely,

Adamstown resident
(and I'd like to continue to stay a longtime
Adamstown resident and not be forced to
move)

From: ecboard@yahoo.com
To: [Planning Commission](#)
Cc: [Council Members](#); [County Executive](#)
Subject: Delay the Overlay
Date: Tuesday, October 14, 2025 9:40:12 AM

[EXTERNAL EMAIL]

Good Morning Planning Commission,

I am sure you will hear dozens of concerns about approving the overlay, so i will not go into all of those.

So far, I have not heard a single good reason for the overlay and expansion. At the last meeting with the County Executives, Mr Murray was asked many times, why the rush to approve the overlay. He kept saying that it was because there were previously 5000 acres for construction and now they are reducing to 2600 in Adamstown. This is not an answer, it is a weak excuse to try and make it sound like a positive action. He later said the reduction of acres could be changed later and all of Frederick opened back up for more. So he negated his answer anyway.

Since the County Council and County Executives will not give a valid answer then that means they do not want to say what the real answer is. The only reason they will not say the real answer is because they are afraid of the residents reactions. If they are afraid of the resident reactions then they should not be doing it as they are supposed to be representing the residents.

Please stop the Overlay and expansion until the many concerns are addressed, answers are given, and we know more about what the impact to the area will be from the current project.

Thank you
Edward

From: [Susan Gordon](#)
To: [Planning Commission](#); [Council Members](#); [County Executive](#); [Susan Gordon](#)
Subject: Letter for the Planning Commission Meeting re the CDI Overlay October 15
Date: Tuesday, October 14, 2025 4:47:14 PM
Attachments: [Planning Commission Letter October 15 2025.docx](#)

[EXTERNAL EMAIL]

To the Planning Commission,

Thank you for your continuing responsiveness to the Frederick County citizens on the matter of the siting and regulation of data centers.

Attached is my letter for tomorrow's meeting. I look forward to being there in person.

Sincerely,

Susan Gordon

From: [Wes Green](#)
To: [Jacqueline Baker -MDR](#); [Alisa Lima -MDR](#); [Diane Wilson](#); [Steve Neck](#)
Cc: [Council Members](#); [Democracy Commission](#); [County Presidents](#); [Roadrunner Roberts](#); [Health/Admiration](#)
Subject: [DRAFT - Quantum Station](#)
Date: [Tuesday, October 14, 2025 10:28:42 AM](#)
Attachments: [DRAFT - Quantum Station.RTF](#) [Letter 040702025.pdf](#)

Silica, asbestos, and heavy metals

Silica, asbestos, and heavy metals

The health dangers of proper safety measures and protective equipment are essential to minimize exposure and protect health. The dust can contain harmful substances such as silica, asbestos, and heavy metals, which can cause respiratory diseases, lung cancer, and other long-term health issues.

Hope Green
5252 Mountville Rd
Adamstown, MD 21710
301-943-1915



Maryland

Department of the Environment

Wes Moore, Governor
Aruna Miller, Lt. Governor

Serena McIlwain, Secretary
Suzanne E. Dorsey, Deputy Secretary
Adam Ortiz, Deputy Secretary

April 7, 2025

ELECTRONIC AND CERTIFIED MAIL

Mr. David Irving, Vice President
Catellus Maryland, LLC
20251 Century Boulevard, Suite 170
Germantown, MD 20874

RE: Request for Information to ensure compliance with Land Use Controls in Quantum Maryland
Property (Former Eastalco Aluminum Plant)
5601 Manor Woods Road, Frederick MD 21701
BMI#MD202

Dear Mr. Irving:

The Maryland Department of the Environment (MDE) conducted an inspection at the Quantum Maryland property located at 5601 Manor Woods Road, Frederick, MD (“site”) on March 28th, 2025. By this letter, we request additional information to evaluate compliance with the requirements set forth in the following documents:

- Environmental Covenant (EC) issued for the property on November 28, 2017.
- Environmental Management Plan (EMP) 1A dated April 1, 2024
- EMP 2 dated May 20, 2024
- EMP 3 dated June 4, 2024
- EMP 4 dated June 4, 2024
- EMP 5 dated November 13, 2024

Specifically, **the property must maintain compliance with the following:**

1. Environmental Covenant issued by the MDE specifies:
 - a. The Health and Safety Plan must include appropriate dust control measures and air monitoring to ensure that all worker protection requirements are met.
2. All EMPs approved by the MDE specifies:
 - a. Visual indications of dust will be observed and recorded, and dust suppression activities will be implemented during earth moving activities at the site.
 - b. A water truck will be routinely present on-site during construction activities and available for use.
 - c. Potable water and approved site dewatering water will be used for dust control.
 - d. Dust monitoring efforts will be implemented to confirm dust doesn't exceed OSHA PEL of 15 mg/m³.

ADDITIONAL INFORMATION NEEDED:

MDE identified the following areas where additional information is needed to determine compliance with the LUCs:

- The MDE site inspection on March 28th, 2025, identified that the required dust control measures were not being implemented on site. Excessive dust was noted by Tate Stevens and Jessica Shulman on March 28th, 2025, Site Visit report. Onsite personnel confirmed the lack of water trucks being used for dust control in the previous weeks, resulting in excessive dust in the work site. In addition, LRP has received citizen inquiries about elevated dust levels in the past month. Consequently, MDE is requesting additional clarification/information regarding the dust control measures. **Please provide verification that proper dust control and monitoring measures were occurring on site in the form of invoices documentation confirming the presence of a water truck, approximate volumes of water utilized for dust control, source of water (potable/frac tanks), and photographic evidence of dust control and monitoring being implemented on site. Please also confirm that dust monitoring will occur daily at the site and dust control measures will be implemented, as required, during all future work at the site.**

The information submitted will be used to determine whether the property is in compliance with the LUCs as set forth in the Environmental Covenant and Environmental Management Plans. All requested information should be provided to the MDE within fourteen (14) business days of receipt of this letter. If you have any questions, please contact Ms. Anuradha Mohanty at 410-537-3446 or anuradha.mohanty@maryland.gov.

Sincerely,

Anuradha Mohanty

Anuradha Mohanty
Project Manager
Land Restoration Program

cc: Mr. Michael Kuykendall, Sr. Vice President, Catellus Maryland, LLC. (Via email: mkuykendall@catellus.com)

Mr. Bill Kennedy, Sr. Vice President, Catellus Maryland, LLC. (Via email: bkennedy@catellus.com)

Mr. William Silverstein, Senior Consultant, GEI (Via email: wsilverstein@geiconsultants.com)
Mr. Brian Dietz, Chief, State Assessment and Remediation Division (Via email: bdietz@maryland.gov)

Ms. Amy Hollister, Section Head, State Superfund (Via email: amy.hollister@maryland.gov)
Ms. Jessica Shulman, Geologist, Land Restoration Program (Via email: jessica.shulman@maryland.gov)

Mr. Tate Stevens, Geologist, Land Restoration Program (Via email: tate.stevens@maryland.gov)

From: kmkinsey@comcast.net
To: [Planning Commission](#)
Cc: [Karen Cannon](#)
Subject: Comments on CDI Overlay Zone Amendments
Date: Tuesday, October 14, 2025 2:26:35 PM
Attachments: [MF PC Comments on Overlay Zone Map.pdf](#)

[EXTERNAL EMAIL]

Dear Chair Davis and Members of the Planning Commission,

Please accept these comments from Mobilize Frederick on the CDI Overlay Zone Comprehensive Plan and Zoning Map Amendments, which are on the agenda for discussion at tomorrow's meeting of the Commission. Thank you for the opportunity to offer comments on this matter.

Sincerely,
Kathy Kinsey

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



October 14, 2025

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

Re: Planning Commission Recommendations on CDI Overlay Zone Map

Dear Chairman Davis and Members of the Planning Commission,

In advance of the upcoming October 15th Planning Commission workshop to consider recommendations to the County Council on the proposed CDI Overlay Zone map, for the reasons discussed below, Mobilize Frederick urges the Commission to recommend limiting the current CDI Overlay Zone to the existing Quantum Frederick campus.

Expanding the Overlay Zone beyond the existing Quantum Frederick campus at this time is ill-advised without the results of an *independent* comprehensive economic, energy, and environmental impact study. In order to ensure that further data center development actually inures to the County's benefit and can be sustainably managed, a thorough understanding of projected net economic benefits, electricity loads, and water consumption associated with new data center development is needed. Across the country, rapid growth of the data center sector is straining the grid, leading to increased reliance on new fossil fuel generation. In this regard, the recently published draft of the proposed joint City and County Climate and Energy Action Plan (CEAP) acknowledges that data centers are now projected to be the County's single largest contributor to greenhouse gas emissions. A decision to expand the Overlay Zone beyond the existing Quantum Frederick campus should not be made without understanding the impacts of this trend on the County's ability to meet its climate goals and renewable energy targets, as well as an analysis of the County's existing water resources and capacity to sustainably support new data center development.

The proposed Overlay Zone includes agricultural tracts currently located in Priority Preservation and Rural Legacy Areas. Inviting upzoning of these agricultural properties to Limited or General Industrial zoning classifications for future data center development without a clearly enforceable agricultural preservation offset provision undermines the goals of the County's agricultural land preservation programs and sets a bad precedent.

Finally, the proposed footprint of the Overlay Zone and expanded Eastalco Community Growth Area would abut two residential communities and extend data center development very close to the southern boundary of the Ballenger Creek Community Growth area, effectively eliminating much of the existing green buffer that currently separates these two large growth areas and could conflict with the County's goals for its Green Infrastructure plan.

Thank you for the opportunity to comment on the CDI Overlay Zone Map.

Sincerely,

KAREN CANNON
Executive Director
Mobilize Frederick

cc: Kathy Kinsey
Chair, Government Affairs Committee

From: [K and E Stephens](#)
To: [Planning Commission](#)
Cc: [Council Members](#); [County Executive](#); [McKay, Steve](#); [Donald, Jerry](#); [Duckett, Kavonte](#); [Keegan-Ayer, MC](#); [Carter, Mason](#); [Young, Brad](#); [Knapp, Renee](#); elysewilsonkhk@gmail.com; residentadamstown@gmail.com
Subject: The Illusion of Mitigation of the 1600 of current Data Center
Date: Tuesday, October 14, 2025 6:06:52 PM

[EXTERNAL EMAIL]

The assertion by some officials, such as Councilman Brad Young, that Adamstown **"will never notice they are there"** is demonstrably false. The reality on the ground—captured in the attached photographs—is a clear violation of the mitigation promises made to this community and a shocking indictment of the self-regulation model.

The visual promises made to shield our community from this industrial zone have been completely ignored or minimized.

1. Failure to Construct Protective Berms

The planned **protective berms** and elevated screening structures meant to hide this massive complex are nowhere to be found.

- As seen in **BigUglyNoBermHere.jpg** and **BallengerDCNOBerm.jpg**, what residents actually face are unshielded, sprawling industrial warehouses and colossal electrical infrastructure projects completely dominating the horizon.
- **NoBerm2Mess.jpg** illustrates the messy, industrial reality on the immediate boundary, with construction materials and fencing directly abutting the streetscape, proving the buffers are entirely absent or ineffective.

2. Failure of Reforestation and Visual Screening

The commitment to replace natural buffers with meaningful reforestation has been reduced to a token, insufficient gesture:

- **CatellusReforestation.jpg** is a powerful visual document showing the so-called "reforestation effort." The industrial buildings stand fully exposed behind a line of sparse, young trees—what amounts to little more than **"Charlie Brown trees"** planted against the backdrop of an enormous industrial wall. This is an insult to the commitment that was made to replace the mature natural buffers we lost.

These failures are a direct result of the industry being allowed to **"police themselves"** and systematically ignore most of the Council's own guidelines. The current reality on the ground is a loud, highly visible industrial sprawl with virtually no effective mitigation.

We cannot trust this company to mitigate the impact of 3,300 acres when they have failed so completely to mitigate the visual and environmental impact of the first 1,600 acres. The visual evidence attached is our strongest argument against approving any further expansion.

A picture is worth a thousand words, so if you do not want to take our word for it see some of these pictures.

PS-We have many more but then the email won't go through.

Ken Stephens

Adamstown MD









From: [Sonia Demiray](#)
To: [Rebecca Flora -MDP-](#)
Cc: [Steve Black](#); [Planning Commission](#); [County Executive](#); [David S. Lapp -OPC-](#); mde.secretary@maryland.gov; paul.pinsky@maryland.gov
Subject: Questions regarding MDPs" review of Frederick County CDI
Date: Tuesday, October 14, 2025 10:39:59 AM
Attachments: [SAletterStateReviewCommentary101225.pdf](#)

[EXTERNAL EMAIL]

Dear Secretary Flora,

I hope you are doing well- it has been a while since we last communicated about the lack of land protections. While that issue is yet to be resolved, I am emailing today regarding a more concrete and immediate matter of concern: the Maryland Department of Planning's (MDP) Review of the Critical Data Infrastructure (CDI) Overlay here in Frederick County.

It has come to our attention that there have been some omissions in the State Review of the CDI Overlay Comprehensive Plan Amendment as requested by the Frederick County Planning Commission on July 28, 2025. Steve Black, President of the Sugarloaf Alliance, has put together the attached memorandum and addenda which very clearly outlines these issues.

I wanted to bring this matter to your attention and ask if you can shed some light on why the MDE, OPC, and MEA did not comment as requested, and why the MDP did not comment on the four alternatives as requested by the Frederick County Planning Commission.

Data Centers are a controversial industry which is being advanced by the Governor, despite our grid not being up to par, setting back our vital clean energy transition, lacking the water necessary for operation, and, importantly, lacking support by affected Marylanders.

Thank you in advance for any clarification you can provide on MDPs' Review.

Best regards,

Sonia

Sonia Demiray

Climate Communications Coalition

202-744-2948

[ClimateCC.org](#)



October 12, 2025

STATE REVIEW OF CDI OVERLAY COMPREHENSIVE PLAN AMENDMENT AND ZONING MAP AMENDMENT

The required 60-day review by the State of Maryland has been completed. The Maryland Department of Planning (MDP) did not provide comment on any of the specific requests contained in the Planning Commission Transmittal Letter, nor did MDP seek comment from the Maryland Energy Administration or the Office of People's Counsel. Furthermore, comments that were received from other State Agencies contain significant errors and omissions.

FCPC Request for a 60-day State Review

On July 16, 2025, the Frederick County Planning Commission held a workshop on the topic of the CDI Overlay Comprehensive Plan Amendment & Zoning Map Amendment, and they revisited this subject again at their meeting the following week.

At their July 23, 2025, meeting, after extensive discussion, the Planning Commission voted 5-1-0-0 to send the Amendment to the State to begin the 60-day review process. As a direct outgrowth of the Commission's conversations around uncertainty of the Draft Plan's readiness to be sent for 60-day review, particularly on questions of water use, energy consumption, and community concerns, the language of the motion expressly stated that in addition to the Maryland Department of Planning (MDP), the Amendment was to be reviewed by the Maryland Department of the Environment (MDE), the Maryland Energy Administration (MEA), and the Office of the People's Council (OPC).

Furthermore, the motion included a detailed request for MDP to provide comment on four other possible overlay areas of varying acreages, with the specific intent that consideration of all four alternative options would be integral to any meaningful analysis for the Planning Commission's decision making on a final recommendation to the County Council.

On July 28, 2025, Planning Commission Chair Davis forwarded the review request to the Maryland Department of Planning. Mr. Davis' letter requested that the CDI Plan be reviewed by MDE, MEA, OPC, and any other agencies MDP thought appropriate. This letter also requested state agency comment on four alternatives to the plan map.

Clarification Regarding Scope of Review

On September 22, 2025, during the 60-day review window, MDP sent an inquiry to Frederick County Planning, asking if and where three of the plan alternatives:

- 1) only the current 2,219-acre Eastalco Community Growth Area;
- 2) the 2,122-acre Quantum Maryland, LLC property; and
- 3) the 1,311-acre area that has received preliminary plan approval,

could be found in the Draft Plan. (The fourth alternative regarding the possible inclusion of the Stup and Geisinger properties into the 2,566 acre CDI overlay was not mentioned in this communication, to the best of our knowledge.)

In response to this inquiry, there followed a clarifying email exchange wherein MDP was informed by Frederick County that, in fact, the none of the specified alternatives in the transmittal letter were part of the Amendment document. It was further stated that these alternatives “were discussed by the Planning Commission at their workshops” and had been included in the transmittal letter to the State merely as a way for the Planning Commission to “convey the fact that they have not yet made a decision.”

Results of the State Review

After this email exchange, on September 26, 2025, MDP returned its official comments in a letter, with attachments, to the Frederick County Planning Commission Chair. Careful examination of these documents shows that the State provided no comment whatsoever on the four alternative maps/alternative acreages requested by the Planning Commission. The State’s comments are directed ONLY to the initial CDI Overlay Map created by the Frederick County Staff and Administration.

The same September 26, 2025, letter further stated that MDP had forwarded a copy of the Amendment to state agencies for review including the Maryland Historic Trust, the Departments of Transportation, Environment, Natural Resources, Commerce, Disabilities, and Housing and Community Development. Counter to the Planning Commission’s explicit request by their motion and transmittal letter, the State’s response made no mention of any type of review by MEA or OPC.

Substantive Omissions from State’s Response

Because the State did not forward the CDI Overlay plan to the Maryland Energy Administration, nor to the Office of People’s Counsel, the State’s reply does not address, and cannot in any way be interpreted as addressing, any of the Commissioners’ questions about the impact of an enlarged CDI Overlay on new power lines, retail electric rates, or any other energy usage concerns.

Since no review of the four alternatives was even attempted by the State, the objectives of the Planning Commission’s request for thorough assessment and comments have clearly not yet been met. Further action, perhaps through direct communication between Frederick County and the relevant state agencies, is needed to complete meaningful reviews on the most impactful areas of community concern.

Errors and Omissions in the State Agency Comments

The official response sent from MDP showed only that agency comments were received from Transportation, Housing and Community Development, and Natural Resources. It further added that any plan review comments received after the date of the letter would be forwarded to the County upon receipt.

MDE

Comments from MDE were indeed forwarded on or around October 7, 2025, but these remarks cover only a portion of the broad environmental concerns of the massive potential data center expansion centered around the Eastalco Industrial Brownfield.

In fact, MDE's assessment curiously omitted two important issues that must be highlighted:

- 1) The CDI Overlay map centers on the significant Eastalco Industrial Brownfield site that is currently under active monitoring by MDE. Since data center construction began, it is undisputed that this site has been the subject of ongoing environmental violations over the last two years, by both Quantum Loophole and the subsequent project developer, Catellus. The most recent violation report (available to the public on the MDE website) is dated September 12, 2025.
- 2) These environmental violations at and around the site became so numerous and so egregious that MDE referred the matter to the Office of the Attorney General for investigation and civil enforcement. These two OAG cases are still active.

However, in returning their comments for 60-day review, MDE opted to make no mention of the Industrial Brownfield, nor of failed regulatory compliance at the complex, nor of the ongoing enforcement actions by the Maryland Attorney General. The fact that the core of the proposed CDI overlay area is an Industrial Brownfield that, despite remediation, still harbors levels of residual contamination so grave that under Maryland's Uniform Environmental Covenants Act (UECA) the property is required to be under an Environmental Covenant **in perpetuity**, would seem to be an important thing for the Maryland Department of the Environment to acknowledge and comment on.

DNR

The Maryland Department of Natural Resources made only a brief comment on the potential loss of Rural Legacy area land. DNR noted that while they have concerns about reduction of the Rural Legacy area, the focus of the overlay is to protect Rural Legacy ground elsewhere in the county. They made this unsubstantiated comment despite the fact there are no other Rural Legacy areas in the county that are already zoned for industrial use. It is nonsensical to believe that giving up Rural Legacy ground in southern Frederick County "protects" Rural Legacy parcels elsewhere in the county.

Housing

Notably the MDP's response included the August 26, 2025, letter from the Maryland Department of Housing and Community Development (DHCD) which contains significant errors, as evidenced by the obvious misperception that the vast expansion area referenced in that Plan amendment is for a SINGLE data center (when in fact, multiple data center complexes will be accommodated) and that it would not be located near any existing communities. These assumptions are patently incorrect, and there are clearly several established neighborhoods and communities immediately adjacent to the proposed expansion areas.

These Omissions and Errors Warrant Pause or Extension of the Process

We urge you to consider that the only responsible course of action is to pause or extend the review process in order to allow for the Frederick County Planning Commission to directly reach out to MEA and OPC for comment, and also to MDE for further input. These indispensable components of review were not facilitated by MDP, yet they remain imperative to be able to proceed with a good faith analysis of the CDI expansion.

Flying blind is never prudent. Until the necessary input from all relevant state agencies is requested, received, and thoroughly examined, the Planning Commission cannot possibly make an **informed** decision on such a significant amendment. The stakes are too high for the Planning Commission to risk acting now in needless ignorance and haste, on this deficient plan that threatens to fully and irreparably alter the character of Southern Frederick County.

attachments:

[Transcript of FCPC Decision for 60-day Review](#)
[Transmittal Letter Requesting 60-day Review](#)
[Exchange of Emails Clarifying FCPC Alternatives for Review](#)
[State Agency Replies](#)

Transcript of Planning Commission Decision to Send CDI Overlay Plan to State

Link to archived video from July 23, 2025 (CDI discussion begins at 6:30 mark)

https://frederick.granicus.com/MediaPlayer.php?view_id=10&clip_id=10383

Excerpt from transcript, on the actual motion:

"Barbara Nicklas

I believe I'm ready for a motion, please....

Okay, I recommend that the plan as presented be advanced to the State to begin a 60 day review ***and to include reviews of four other possible overlay areas: One, the 2219 acre East Alco growth area. Two, the 2122 acre holdings of Quantum Loop campus. Three, the 1300 plus acres already permitted for data center development within the Quantum Loop campus. And four, the inclusion of the Stup and Geisinger properties into the 2566 acre CDI overlay that is in the plan as presented.***

Additionally, we request that a review of these potential CDI Overlay Zones be by the Maryland Department of the Environment, the Maryland Energy Administration and the Office of the People's Council.

Joel Rensberger

Second.

Tim Davis

A motion by Miss Nicholas, seconded by Mr. Rensburger, and I'll clarify that motion by Miss Nicklas with additional information, since this is a new motion for us, so I'm going to call the roll, Miss Nicklas.

Barbara Nicklas

Aye.

...

Joel Rensberger

Aye

...

Sam Tressler

Aye

...

Mark Long

Even though I understand the rationale for expanding, for sending this expanded map to the state I'm voting No.

...

Craig Hicks

Yeah, with the understanding that we're going to be doing more work on this after we get feedback from the state, and that that work will include additional input and interactions with residents.

...

Tim Davis

I vote aye. Chair votes aye. Motion passes 5-1-0-0 ..."

###



FREDERICK COUNTY GOVERNMENT

PLANNING COMMISSION

Jessica Fitzwater
County Executive

Tim Davis, Chair

July 28, 2025

VIA ELECTRONIC MAIL

Susan Llareus
Planner Supervisor/Regional Planner for Maryland Capital Region
Maryland Department of Planning
120 E. Baltimore Street
Baltimore, MD 21202

Re: Livable Frederick Master Plan Amendment & Associated Zoning Map Amendment

Dear Ms. Llareus,

The Frederick County Planning Commission is hereby submitting a draft amendment to the *Livable Frederick Master Plan*, and an associated zoning map amendment, for 60-day review. We request review by Maryland Department of Planning (MDP), Maryland Department of the Environment, Maryland Energy Administration, and the Maryland Office of People's Council, as well as any other departments or agencies that MDP is inclined to include in the review.

The *Livable Frederick Master Plan* (the Plan) was adopted in September 2019. On Page 43, the Plan describes the area of the decommissioned "Eastalco" site. Alcoa manufactured aluminum on the site from 1969 until 2005. Closure of the facility in 2010 was followed by demolition of the structures on the property. The Plan states, "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."

This is no longer accurate. In 2021, the 2,122-acre Eastalco property was purchased by Quantum Maryland, LLC. Since then, a 1,311-acre area of the property has received preliminary subdivision plan approval and numerous site plans have been approved for the development of a data center campus. Development of data centers in accordance with these site plans is underway.

Seeking to prevent data center sprawl, best utilize existing and planned infrastructure, and ensure that industrial land elsewhere in the County is available for target industries such as life sciences, County Executive Fitzwater and the County Council announced in May of 2025 that data centers will be limited to the Eastalco area. This will be accomplished via the creation of a Critical Digital Infrastructure Overlay Zone (CDI-OZ).

The Frederick County Planning Commission held a public hearing on July 9, 2025, on Council Bill 25-09, a zoning text amendment to enable the creation of the CDI-OZ. The Planning Commission held workshops on July 16 and 23 to consider the subject amendment to the *Livable Frederick Master Plan*, which expands the Eastalco Community Growth Area, changes land use



FREDERICK COUNTY GOVERNMENT

PLANNING COMMISSION

Jessica Fitzwater
County Executive

Tim Davis, Chair

Susan Llareus

Planner Supervisor/Regional Planner for Maryland Capital Region

July 28, 2025

Page 2

designations, changes water/sewer classifications, and changes the Priority Preservation Area and Rural Legacy Area maps. Please note that we are aware that changes to the Rural Legacy Area map require State approval. An amendment to the zoning map to delineate the CDI-OZ was also considered.

Please note that the Planning Commission has discussed and may ultimately recommend to the County Council a more limited area for the CDI-OZ. Alternatives discussed include:

1. Only the current 2,219-acre Eastalco Community Growth Area
2. Only the 2,122-acre Quantum Maryland, LLC property
3. Only the 1,311-acre area that has received preliminary plan approval

Scenario 1 would not require changes to the Eastalco Community Growth Area boundary, land use designations, water/sewer classifications, or the Priority Preservation Area map.

Additionally, the owners of the Stup (3750 Howard Stup Road) and Geisinger (3710 Cap Stine) properties have requested inclusion in the CDI-OZ. These properties are 138 acres and 211 acres in size. The Geisinger property is encumbered with a MALPF easement. The property owner has been advised that only the MALPF Board has the authority to terminate the easement.

Comments from the State agencies and departments are welcome on the aforementioned scenarios and properties, in addition to comments on the amendment to the *Livable Frederick Master Plan* and the zoning map amendment submitted herewith. The Frederick County Planning Commission looks forward to receiving comments from the State and hearing from the public before deciding upon a recommendation to the Frederick County Council.

Sincerely,

A handwritten signature in blue ink that appears to read "Tim Davis".

Tim Davis

Chair, Frederick County Planning Commission

cc: Chuck Boyd, Assistant Secretary, Maryland Department of Planning
Kimberly Gaines, Director, Livable Frederick Planning & Design Office

**Susan Llareus -MDP- <susan.llareus@maryland.gov>**

RE: LFMP Amendment for 60-Day Review

1 message

Gaines, Kimberly <KGaines@frederickcountymd.gov>

Mon, Sep 22, 2025 at 10:26 AM

To: Susan Llareus -MDP- <susan.llareus@maryland.gov>Cc: Chuck Boyd -MDP- <chuck.boyd@maryland.gov>, "mdp.planreview@maryland.gov" <mdp.planreview@maryland.gov>, "Mitchell, Kathy (Legal)"<KMitchell2@frederickcountymd.gov>, "trekker01@verizon.net" <trekker01@verizon.net>

Hi Susan,

Those alternatives are not included in the amendment document. They were discussed by the Planning Commission at their workshops. Each of the three alternatives is more limited geographically than what is proposed. Thus, if the Planning Commission elects to recommend one of these alternatives to the County Council, the maps and the narrative will have to be revised accordingly. In including those alternatives in the letter, the Planning Commission sought to convey the fact that they have not yet made a decision. They will do so after the public hearing has been held.

Best,

Kim

Kimberly Gaines

Livable Frederick Director

kgaines@frederickcountymd.gov

(301) 600-1144

Livable Frederick Planning and Design Office

<http://www.frederickcountymd.gov/livablefrederick>

30 North Market Street

Frederick, MD 21701



From: Susan Llareus -MDP- <susan.llareus@maryland.gov>
Sent: Monday, September 22, 2025 10:14 AM
To: Gaines, Kimberly <KGaines@FrederickCountyMD.gov>
Cc: Chuck Boyd -MDP- <chuck.boyd@maryland.gov>; mdp.planreview@maryland.gov; Mitchell, Kathy (Legal) <KMitchell2@FrederickCountyMD.gov>; trekker01@verizon.net
Subject: Re: LFMP Amendment for 60-Day Review

[EXTERNAL EMAIL]

Kim,

I have a question also relating to the original transmittal letter. The following alternative recommendations are included in the letter:

Please note that the Planning Commission has discussed and may ultimately recommend to the County Council a more limited area for the CDI-OZ. Alternatives discussed include:

1. Only the current 2,219-acre Eastalco Community Growth Area
2. Only the 2,122-acre Quantum Maryland, LLC property
3. Only the 1,311-acre area that has received preliminary plan approval

Please let me know if and where these alternatives can be found in the draft plan.

Thank you,

Susan

On Fri, Sep 19, 2025 at 10:07 AM Gaines, Kimberly <KGaines@frederickcountymd.gov> wrote:

Dear Susan,

The attached letter corrects an error in the July transmittal letter regarding the Stup and Geisinger properties. I would appreciate you sharing this with any agency whose comments may be impacted, particularly Maryland Department of Agriculture. Thank you.

Best,

Kim

Kimberly Gaines

Livable Frederick Director

kgaines@frederickcountymd.gov

(301) 600-1144

Livable Frederick Planning and Design Office

<http://www.frederickcountymd.gov/livablefrederick>

[30 North Market Street](#)

[Frederick, MD 21701](#)

(301) 600-1138



From: Gaines, Kimberly
Sent: Thursday, September 18, 2025 3:33 PM
To: susan.llareus@maryland.gov
Cc: Chuck Boyd -MDP- <chuck.boyd@maryland.gov>; mdp.planreview@maryland.gov; Mitchell, Kathy (Legal) <KMitchell2@FrederickCountyMD.gov>
Subject: RE: LFMP Amendment for 60-Day Review

Dear Susan,

An error in our transmittal letter has been brought to my attention. I will be sending a follow-up letter noting that the Stup property is encumbered with a MALPF easement; the Geisinger property is not. As we near the conclusion of 60-day review, I just wanted to give you a heads up about this issue and the corrective letter to come.

Best,

Kim

Kimberly Gaines

Livable Frederick Director

kgaines@frederickcountymd.gov

(301) 600-1144

Livable Frederick Planning and Design Office

<http://www.frederickcountymd.gov/livablefrederick>

30 North Market Street

Frederick, MD 21701

(301) 600-1138



From: Gaines, Kimberly
Sent: Monday, July 28, 2025 3:19 PM
To: susan.llareus@maryland.gov
Cc: Chuck Boyd -MDP- <chuck.boyd@maryland.gov>; Trekker The Boingo <trekker01@verizon.net>; mdp.planreview@maryland.gov
Subject: LFMP Amendment for 60-Day Review

Dear Susan,

Please see the attached amendment to the Livable Frederick Master Plan and the associated transmittal letter from the chair of the Frederick County Planning Commission, Tim Davis. We look forward to receiving the State's 60-Day Review comments on the amendment. Please feel free to contact me with any questions.

Best,

Kim

Kimberly Gaines

Livable Frederick Director

kgaines@frederickcountymd.gov

(301) 600-1144

Livable Frederick Planning and Design Office

<http://www.frederickcountymd.gov/livablefrederick>

30 North Market Street

Frederick, MD 21701

(301) 600-1138



Wes Moore

Governor

Aruna Miller

Lt. Governor



Maryland
DEPARTMENT OF PLANNING

Rebecca L. Flora

AICP, LEED ND / BD+C

Secretary

Kristin R. Fleckenstein

Deputy Secretary

September 26, 2025

Chairman Joel Rensberger
Frederick County Planning Commission
30 North Market Street
Frederick, MD 21701

Re: 2025 Frederick County Public Hearing Draft, Critical Digital Infrastructure Overlay Zone
Livable Frederick Master Plan Amendment

Dear Chair Joel Rensberger,

Thank you for requesting Maryland Department of Planning (MDP) comments on the above referenced amendment to the Livable Frederick Master Plan (LFMP), amending the East Alcoa Community Growth area and the associated land uses. MDP appreciates the opportunity to comment on the draft amendment (Amendment) in preparation for the Planning Board hearing(s). These comments are offered to guide the county in ways to improve the Amendment and better address the statutory requirements of the Land Use Article.

The Department forwarded a copy of the Amendment to state agencies for review including the Maryland Historic Trust, the Departments of Transportation, Environment, Natural Resources, Commerce, Disabilities, and Housing and Community Development. To date, we have received comments from Transportation, Housing and Community Development, and Natural Resources, and they are attached to this review. Any plan review comments received after the date of this letter will be forwarded upon receipt.

Sincerely,

Joe Griffiths, AICP
Director, Planning Best Practices

cc: Deborah Carpenter, Director Frederick County Planning and Permitting
Kimberly Gaines, Livable Frederick Director, Division of Planning and Permitting
Susan Llareus, Planning Supervisor, Maryland Department of Planning

Enclosures: Review Comments Critical Digital Infrastructure Overly Zone LFMP Amendment
Planning Principles Comprehensive Plan Model Insert



Maryland Department of Planning
Public Hearing Draft Livable Frederick Master Plan (LFMP) Amendment
Critical Digital Infrastructure Overlay Zone
July 2025

The Maryland Department of Planning (MDP) offers the following as suggestions to improve the Draft Plan and better address the statutory requirements of the Land Use Article. The Maryland Department of Transportation, Natural Resources, and Housing and Community Development as noted and included below, have contributed comments.

Summary of the Amendment

The draft amendment (Amendment) to the Livable Frederick Master Plan (LFMP) is for the purpose of expanding the Eastalco Community Growth Area and changing land uses. The Amendment sets forth future water and sewer service changes but does not change the categories. That process is separate and is governed under the Environmental Article. See further discussion under the Water Resource Element below. This Amendment does not re-zone properties, which is also a separate action that is anticipated after the adoption of the amendment to LFMP.

2025 Legislation Impacting Local Planning

MDP identified the following bills, adopted by the General Assembly during the 2025 session, that may impact local planning, implementation, and reporting. This list is not comprehensive but is provided as a courtesy for present and future planning purposes. In partnership with other state agencies, MDP is analyzing the bills and will be developing guidance. Other bills have been noted below in reference to the required elements of the plan.

Local Land Use Reporting

- [HB 1193](#) - Maryland Housing Data Transparency Act

Energy

- [SB 931/HB 1036](#) - Renewable Energy Certainty Act - Natural Resources and Comp Plans, effective July 1, 2025
 - The county is encouraged to develop or incentivize alternative energy sources which developers may utilize within the overlay zone. The Maryland Energy Administration is offering the [Local Government Energy Modernization program](#) which may support the county with funding to identify energy resilience strategies. While the state's energy landscape continues to face mounting challenges, supporting the proposed industrial zone with resilient energy systems may greatly improve project feasibility, minimize adverse impacts to the local energy grid, and mitigate power generation/delivery related emissions.
 - In addition to the Renewable Energy Certainty Act, the county is encouraged to reference the [Solar Facility Siting Guidance](#) produced by MDP. While assessing the feasibility of renewable energy development, this guidance may support the county to optimize energy capacity with existing or future proposed land use changes.

Housing

- [HB 1466/SB 891](#) Accessory Dwelling Units - Requirements and Prohibitions, effective October 1, 2025. This analysis does not include a discussion relating to the housing element, as it is not expected that the area of this amendment will result in any residential community development.

Natural Resources and Comp Plans

- [HB 731](#) - Wildlife - Protections and Highway Crossings, effective July 1, 2025. Requires sensitive areas elements to consider wildlife movement and habitat connectivity when enacting, adopting, amending, or executing a comprehensive plan.

Planning Principles

- [SB 266](#) - Local Comprehensive Planning and State Economic Growth, Resource Protection, and Planning Policy - Planning Principles, effective October 1, 2025. This bill overhauls the State's Economic Growth, Resource Protection, and Planning Policy (Policy) by consolidating the Policy's 12 Visions into 8 Planning Principles that will guide and inform state and local planning practices. The new Principles are Land, Transportation, Housing, Economy, Equity, Resilience, Place, and Ecology, and collectively they are intended to foster a high quality of life for all residents by creating sustainable communities and protecting the environment. MDP recommends that jurisdictions consider the principles in any comprehensive plan or comprehensive plan amendment adopted after October 1, 2025, and discuss with their attorney how they might acknowledge, describe, and implement the principles in the final adopted version. Attached to this review is a model one-page principles comprehensive plan insert that Frederick County may use for the purpose of acknowledgement.

Draft Plan Analysis

Maryland's Land Use Article Sections 1-406(a) and (b) require the inclusion of certain elements within the general plan. The following checklist provides for each required plan elements for a Charter County and the Maryland Code reference. This check list is intended to help the county determine consistency with the Land Use Article.

Checklist of Maryland Code (Land Use Article)-Charter County Division I, Title 1, Subtitle 4 Required Elements Division II, Section 21-104(a) Required elements.	
State Comprehensive Plan Requirements	MD Code Reference and Additional MD Code Reference
(1) The planning commission for a charter county shall include in the comprehensive or general plan the visions under § 1-201 of this title* and the following elements:	L.U. § 1-406 (a)
(i) a development regulations element	L.U. § 1-406 (a) (1) (i) L.U. § 1-407 -- Development Regulations Element

(ii) a housing element	L.U. § 1-406 (a) (1) (ii) L.U. § 1-407.1 -- Housing Element
(iii) a sensitive areas element	L.U. § 1-406 (a) (1) (iii) L.U. § 1-408 -- Sensitive Areas Element
(iv) a transportation element	L.U. § 1-406 (a) (1) (iv) L.U. § 1-409 -- Transportation Element
(v) a water resources element	L.U. § 1-406 (a) (1) (v) L.U. § 1-410 -- Water Resources Element
(2) a mineral resources element, IF current geological information is available	L.U. § 1-406 (a) (2) L.U. § 1-411 -- Mineral Resources Element
(b) A comprehensive plan for a charter county MAY include a priority preservation area (PPA) element	L.U. § 1-406 (b) For PPA Requirements, see § 2-518 of the Agriculture Article
(4) Visions -- A county SHALL through the comprehensive plan implement the 12 planning visions established in L.U. § 1-201*	L.U. § 1-414 L.U. § 1-201 -- Visions
(5) Growth Tiers -- If a county has adopted growth tiers in accordance with L.U. § 1-502, the growth tiers must be incorporated into the county's comprehensive plan	L.U. § 1-509

*SB266, Local Comprehensive Planning and State Economic Growth, Resource Protection, and Planning Policy - Planning Principles passed and supersedes the visions, with an effective date of October 1st, 2025.

Conformance with Section 1-406. Element - Charter Counties of the Land Use Article

The following analyzes how the Draft Plan meets the requirements of a charter county comprehensive plan elements, in accordance with the Land Use Article.

1. Development Regulations Element – Synopsis

The element is required to include the planning commission's recommendations for land development regulations to implement the plan. Regulations are required to be flexible to promote innovative and cost saving site design, protect the environment and identify areas of growth. The areas identified for growth are required to encourage flexible regulations, which should further promote economic development using innovative techniques, streamlining the review of applications, including permit review and subdivision processing.

Plan Analysis

In regard to zoning, this area is intended to be the location for future data center development in the county and will be regulated through the Critical Digital Infrastructure (CDI) Overlay Zone, as described

in [Section 1-19-8.402. CRITICAL DIGITAL INFRASTRUCTURE FACILITIES](#) and [Section 1-19-8.403 CRITICAL DIGITAL INFRASTRUCTURE ELECTRICAL SUBSTATION](#) of the Frederick County Zoning Ordinance. This Amendment to the comprehensive plan does not impact the previous actions taken by the legislative branch that adopted the new CDI overlay. MDP's review does not address the previously adopted legislation.

2. Sensitive Areas Element – Synopsis

The sensitive areas element is required to include the goals, objectives, principles, policies, and standards designed to protect sensitive areas from the adverse effects of development (more recently referred to as climate change impacts). The Land Use Article also assigns sensitive areas element data provision and review responsibilities to the Maryland Departments of the Environment (MDE) and Natural Resources (DNR).

Plan Analysis

Please note that the Maryland Department of Natural Resources provided comments on this amendment in their undated letter (attached).

MDP notes that there may be an opportunity to address new legislation: [HB 731](#) - Wildlife - Protections and Highway Crossings, which became effective on July 1, 2025 along MD 15. However, MDP notes that the Community Growth area abutting the highway appears to have an established lotting pattern in the area directly adjacent to the right-of-way, as well as buildings and other improvements, and it may not be feasible to create a connection to the properties west of the highway. MDP suggests that the county defer to their legal staff as to the applicability of HB 731 to the Amendment.

3. Transportation Element - Synopsis

The transportation element is required to reasonably project into the future the most appropriate and desirable location, character, and extent of transportation facilities to move individuals and goods, provide for bicycle and pedestrian access and travelways, and estimate the use of proposed improvements.

Plan Analysis

Please note that the Maryland Department of Transportation provided comments on this amendment in their letter dated September 4, 2025 (attached). In addition, MDP's transportation planning staff notes that Frederick County has an adequate public facilities test to address traffic issues in the development review process.

4. Water Resources Element – Synopsis

The water resource element is required to consider available data provided by the Maryland Department of the Environment (MDE) to identify drinking water that will be adequate for the needs of existing and future development proposed in the plan, as well as suitable receiving waters and land areas to meet stormwater management and wastewater treatment and disposal needs. MDE and MDP are available to provide technical assistance to prepare the water resources element, ensuring consistency with MDE programs and goals. MDE and MDP jointly developed WRE guidance to

demonstrate how local governments can ensure compliance with the WRE requirements. Local jurisdictions are expected to implement the most important aspects of the [MDE/MDP WRE guidance](#).

Plan Analysis

All properties within the existing Eastalco Community Growth Area are either planned for water and sewer service within 20 years (the county's planned service) or within three to five years, and some properties are already served. Several properties that would be added to the community growth area and/or CDI overlay zone are proposed to change from no planned water/sewer service to planned service. The water/sewer plan is separate and must be approved by MDE. A service category within the water/sewer plan cannot be changed through a comprehensive plan amendment. The comprehensive plan sets up the anticipated land use and expectation of future service.

The Amendment does not provide demand and capacity tables for water or wastewater supply to demonstrate whether the county has adequate capacity to meet future water and wastewater demand. Has the county considered providing tables in the amendment to demonstrate current and future water and sewer demand compared to water and wastewater capacity? MDP suggests asking the Maryland Department of the Environment for information on projected water demand, specifically water-resource demands of data centers, or guidance to assist the county with estimating projected water demand. See this website: [water capacity management guidance here \(Appendix B\)](#).

Growth Tier Map

The Frederick County Tier Map was adopted by the Frederick County Board of County Commissioners on February 26, 2013. The LFMP states "The Growth Tiers Map constitutes another component of the Livable Frederick Comprehensive Plan...The Frederick County Comprehensive Plan Map, the Growth Tier Map, the Priority Preservation Areas Map, and the Zoning Map remain unaltered by the adoption of the Livable Frederick Master Plan. They will remain so until such time as Frederick County seeks to specifically amend and update these documents based on the Development Framework, the Action Framework described in this document, and future community and corridor, large area, and functional plans developed and adopted by the county" (LFMP, page 15). Therefore, the county's Growth Tier Map is considered adopted into the existing master plan.

Should the proposed Amendment be adopted, an amendment to the Growth Tier Map should follow. Part of the expanded community growth area appears to be located in Tiers I, IA, and other portions of the area appear to be in Tiers III and IV. Since the Amendment proposes area within the community growth as changing from no planned service to planned for sewer service, the county Growth Tier Map should be updated accordingly.

**Maryland Department of Planning Review Comments
Draft Plan**

STATE AGENCY COMMENTS

The following are state agency comments in support of MDP's review of the draft plan. Comments not included here may be submitted under separate cover, or via the State Clearinghouse. If comments from other agencies are received by MDP, the department will forward them as soon as possible.

Attachments

Maryland Department of Transportation

Maryland Department of Natural Resources

Maryland Department of Housing and Community Development

September 4, 2025

Ms. Susan Llareus
c/o Ms. Rita Pritchett
Maryland Department of Planning
120 E. Baltimore Street
Suite 2000
Baltimore MD 21202

Dear Ms. Llareus:

Thank you for coordinating the State of Maryland's comments on the Frederick County Livable Frederick Master Plan Amendment and Associated Zoning Map Amendment (the Amendment). The Maryland Department of Transportation (MDOT) offers the following comments on the Amendment for consistency with the State of Maryland and MDOT's goals and objectives.

General Comments

- In general, the Amendment is consistent with MDOT plans and programs.
- The MDOT encourages Frederick County to consider incorporating the needs and safety of people walking, biking, and rolling in the proposed Critical Digital Infrastructure (CDI) Overlay Zone. This Amendment provides an opportunity for the County to detail a transportation vision within the CDI and accommodate active transportation needs that support industrial, low-density residential, and other rural land uses. The MDOT notes bicycle and pedestrian-focused safety countermeasures from the State Highway Administration (SHA) Context Driven Toolkit, offer resources to address the area's high equity need, low bicycle accessibility, and short-trip opportunity areas, as well as a rural-focused approach to safe routes to school.

Detailed Comments

- Pg. 3 Current Conditions – Eastalco Community Growth Area (CGA): Consider outlining the County's current approach to active transportation in the CGA.
- Pg. 9 Summary of Recommendations: Consider adding a recommendation about how the County plans to support safe, context-sensitive active transportation access within, to, and from the CDI.
- Pg. 10-11 Current and Proposed Comprehensive Plan Map: Consider showing existing and proposed walking and biking infrastructure, particularly sidewalks.

Ms. Susan Llareus
Page Two

Thank you again for the opportunity to review the Amendment. If you have any additional questions or concerns, please do not hesitate to contact Ms. Nicole Condol, Transportation Planner, MDOT Office of Planning, Programming, and Project Delivery (OPPPD) at 410-230-6614, or via email at ncondol@mdot.maryland.gov. Ms. Condol will be happy to assist you.

Sincerely,



Geoff Anderson
Chief, OPPPD, MDOT

cc: Ms. Nicole Condol, Transportation Planner, OPPPD, MDOT
Ms. Michelle D. Martin, Director of Planning, OPPD, MDOT
Ms. Kari Snyder, Regional Planner, OPPPD, MDOT



Wes Moore, Governor
Aruna Miller, Lt. Governor
Josh Kurtz, Secretary
David Goshorn, Deputy Secretary

Maryland Department of Planning
301 West Preston Street
Suite 1101
Baltimore, MD 21201

Memo: MD DNR comments on Liveable Frederick Master Plan Amendment

To: Susan Llareus
cc: Rita Pritchett

On behalf of the Department of Natural Resources, thank you for the opportunity to comment on the Liveable Frederick Master Plan Amendments. The draft document was distributed to appropriate contacts at the Maryland Department of Natural Resources and reviewed. DNR offers the following comments:

The Maryland Forest Service reviewed this plan with respect to the Forest Conservation Act. The expanded overlay includes areas of existing forest, including Riparian Forest Buffers (RFB). The existing overlay also includes RFB. The FCA conservation thresholds are known and available. Frederick County should follow the FCA laws on reforestation requirements as this area is developed (retain 20% of the forest acreage about the conservation threshold, area cleared above the threshold must be replaced by planting 1/4 acre per acre cleared on site, forest area cleared below the conservation threshold must be replaced by planting 2 acres for each acre cleared). Frederick County uses honor banking. The reviewers have some reservations about removing land from rural legacy, but it seems the intent is to create only one area in the county for data center development. Losing these eligible parcels may result in saving others.

The Natural Areas (Areas) include Riparian Forest Buffers (RFBs). It is important to note one of these RFBs bisects the proposed General Industrial Area. Frederick County should monitor the potential development proposed near these Areas and ensure best management practices are followed. This includes but is not limited to the retention of RFB areas with a minimum width of 35 feet and avoiding stream crossings when able. The reviewers would also suggest investigating opportunities to mitigate the potential increased overland flow and consequential erosion adjacent to these Areas during construction.

Once again, thank you for the opportunity to provide comments. If you have any questions about these comments or would like further information, please do not hesitate to contact me at 443-534-4151 or christine.burns1@maryland.gov.

Best,
Christine Burns



WES MOORE
Governor
ARUNA MILLER
Lt. Governor
JACOB R. DAY
Secretary
JULIA GLANZ
Deputy Secretary

August 26, 2025

Ms. Susan Llareus, Regional Planner
Maryland Department of Planning
120 E. Baltimore Street
Suite 2000
Baltimore, MD 21202

Dear Ms. Llareus:

Thank you for the opportunity to review and comment on the Livable Frederick Master Plan Amendment & Associated Zoning Map Amendment (the “Plan”). When reviewing plans, the Maryland Department of Housing and Community Development (“DHCD”) comments on items for which political subdivisions can strategically leverage DHCD’s resources to accomplish their housing and community development goals. DHCD also reviews comprehensive plans for consistency with relevant statutes and, if appropriate, Sustainable Communities Plans.

The Plan relates to a master plan amendment to accommodate a data center in Frederick County. The proposed data center is located well outside the boundaries of existing designated Sustainable Communities and does not appear to be located near any existing communities. Therefore, DHCD programs, and program investments are unlikely to be directly impacted by the Plan. As a result, DHCD does not have any comments regarding the Plan.

Again, thank you for the opportunity to review and comment on the Plan. If you have any questions, please contact me at john.papagni@maryland.gov or 301-429-7670.

Sincerely,

A handwritten signature in black ink, appearing to read "John Papagni".

John Papagni
Program Officer
Division of Neighborhood Revitalization

Cc: Joseph Griffiths, Maryland Department of Planning
Rita Pritchett, Maryland Department of Planning
Garland Thomas, DHCD Division of Neighborhood Revitalization
Sara Jackson, DHCD Division of Neighborhood Revitalization
Olivia Ceccarelli, DHCD Division of Neighborhood Revitalization



MARYLAND DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
7800 HARKINS RD • LANHAM, MD 20706 • DHCD.MARYLAND.GOV
301-429-7400 • 1-800-756-0119 • TTY/RELAY 711 or 1-800-735-2258





Livable Frederick Master Plan Amendment & Associated Zoning Map Amendment

Maryland Department of the Environment – WSA/WPRPP

REVIEW FINDING: R1 Consistent with Qualifying Comments
(MD20250730-0523)

Water & Sewer:

It is important to note that data centers can use large amounts of water and wastewater capacity. Prior to a change to the water and sewer classification, the jurisdiction should review current and future use to determine if there is adequate capacity. Water Appropriation and Use Permits may need to be updated to include the use. Also, depending on the location of the proposed data center, COMAR 26.17.07, Consumptive Use of Surface Water in the Potomac River Basin, may impact the conditions in the Appropriation and Use permit for an intake on the Potomac.

Flooding:

Please be advised, the property or properties in MD20250730-0523 is/are in close proximity to Flood Zone AE (100-year Floodplain) and X (500-year Floodplain). The project coordinator(s) should follow local floodplain ordinances and Federal Emergency Management Agency's guidelines and standards.

It is advised that the coordinator(s) consider climate resiliency, which could include but not limited to the following steps (<https://toolkit.climate.gov/>):

- Explore Hazards: Identify climate and non-climate stressors, threats, and hazards and how they could affect assets (people and infrastructure).
- Assess vulnerability and risks: Evaluate assets vulnerability and estimate the risk to each asset.
- Investigate options: Consider possible solutions for your highest risks, check how others have responded to similar issues, and reduce your list to feasible actions.
- Prioritize and plan: Evaluate costs, benefits, and capacity to accomplish each action integrating the highest value actions into a stepwise plan.
- Take action: Move forward with your plan and check to see if your actions are increasing your resilience with monitoring.

The coordinator(s) is advised to contact Dave Guignet, State National Flood Insurance Program Coordinator, of MDE's Stormwater, Dam Safety, and Flood Management Program, at (410) 537-3775 for additional information regarding the regulatory requirements for Floodplains and Storm Surges.

The coordinator(s) is advised to contact Matthew C. Rowe, CC-P, Deputy Director of MDE's Water and Science Administration, at (410) 537-3578 for additional information regarding Climate Change and Resiliency.

MDE Comments for Environmental Clearinghouse Project

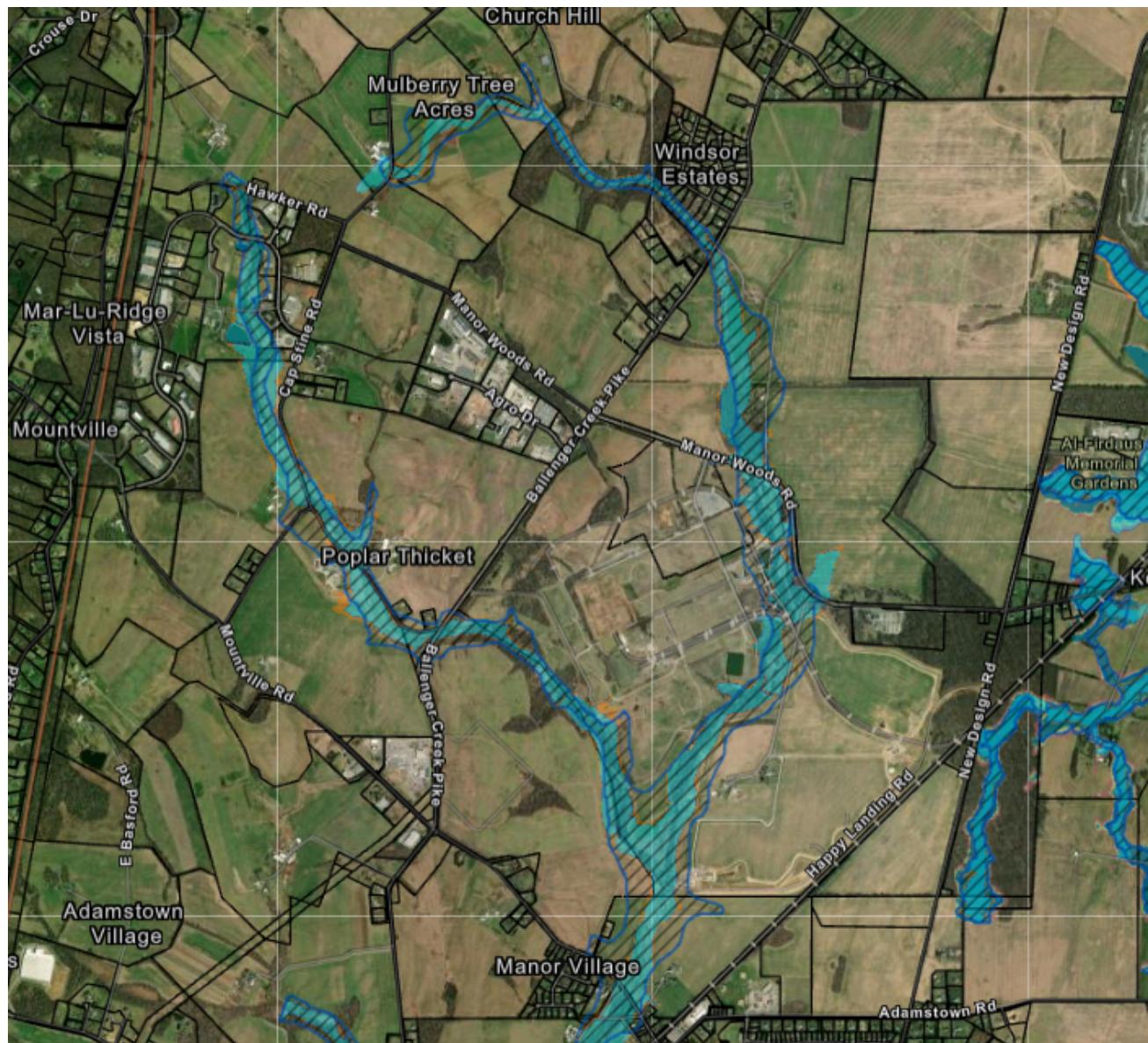
MD20250730-0523

Response Code: R-1

1. Construction, renovation and/or demolition of buildings and roadways must be performed in conformance with State regulations pertaining to "Particulate Matter from Materials Handling and Construction" (COMAR 26.11.06.03D), requiring that during any construction and/or demolition work, reasonable precaution must be taken to prevent particulate matter, such as fugitive dust, from becoming airborne.
2. During the duration of the project, soil excavation/grading/site work will be performed; there is a potential for encountering soil contamination. If soil contamination is present, a permit for soil remediation is required from MDE's Air and Radiation Management Administration. Please contact the New Source Permits Division, Air and Radiation Management Administration at (410) 537-3230 to learn about the State's requirements for these permits.
3. If any project can be considered regionally significant, such as a shopping mall, a sports arena, industrial complex, or an office complex, the project may need to be identified to the regional Metropolitan Planning Organization (MPO). Project managers who need a permit to connect their projects to a State or federal highway should contact the Planning Division of the Planning and Monitoring Program, Air and Radiation Administration, at (410) 537-3240 for further guidance.
4. If a project receives federal funding, approvals and/or permits, and will be located in a nonattainment area or maintenance area for ozone or carbon monoxide, the applicant needs to determine whether emissions from the project will exceed the thresholds identified in the federal rule on general conformity. If the project emissions will be greater than 25 tons per year, contact the Air Quality Planning Program of the Air and Radiation Administration, at (410) 537-4125 for further information regarding threshold limits.
5. Lighting for security, athletic fields, and parking needs to be shielded from nearby residences.
6. Electrical generators powered by internal combustion engines, having a rated capacity of 375 kW or greater, are required to obtain permits from the Air and Radiation Management Administration. Please contact the New Source Permits Division, Air and Radiation Management Administration at (410) 537-3230 to learn about the State's requirements and the permitting processes for such equipment.
7. Any above ground or underground petroleum storage tanks, which may be utilized, must be installed and maintained in accordance with applicable State and federal laws and regulations. Underground storage tanks must be registered and the installation must be conducted and performed by a contractor certified to install underground storage tanks by the Land and Materials Administration in accordance with COMAR 26.10. Contact the Oil Control Program at (410) 537-3442 for additional information.
8. Any solid waste including construction, demolition and land clearing debris, generated from the subject project, must be properly disposed of at a permitted solid waste acceptance facility, or recycled if possible. Contact the Solid Waste Program at (410) 537-3315 for additional information regarding solid waste activities and contact the Resource Management Program at (410) 537-3314 for additional information regarding recycling activities.
9. The Resource Management Program should be contacted directly at (410) 537-3314 by those facilities which generate or propose to generate or handle hazardous wastes to ensure these activities are being conducted in compliance with applicable State and federal laws and regulations. The Program should also be contacted prior to construction activities to ensure that the treatment, storage or disposal of hazardous wastes and low-level radioactive wastes at the facility will be conducted in compliance with applicable State and federal laws and regulations.
10. The proposed project may involve rehabilitation, redevelopment, revitalization, or property

acquisition of commercial, industrial property. Accordingly, MDE's Brownfields Site Assessment and Voluntary Cleanup Programs (VCP) may provide valuable assistance to you in this project. These programs involve environmental site assessment in accordance with accepted industry and financial institution standards for property transfer. For specific information about these programs and eligibility, please Land Restoration Program at (410) 537-3437.

11. Borrow areas used to provide clean earth back fill material may require a surface mine permit. Disposal of excess cut material at a surface mine may require site approval. Contact the Mining Program at (410) 537-3557 for further details.



From: [Bill Steigelmann](#)
To: [Planning Commission](#)
Cc: [County Executive](#); [Council Members](#)
Subject: Re: CDI Overlay considerations, 10/15/25 Planning Commission meeting
Date: Tuesday, October 14, 2025 3:40:30 PM

[EXTERNAL EMAIL]

Planning Commissioners and other County Officials,

I live on a 100-acre fam located between Middletown and Jefferson, and object to the County's premature plan to change the zoning of high-quality Agricultural land to Industrial. Some day this change may be needed, but 2015 is not the time -- there are still several lots for data center construction available at the former Eastalco property, which the County has already dedicated to this use. Therefore:

My Primary Recommendation is that you advise the County County (CC) to postpone actions to implement the CDI Overlay and alter zoning until such time that additional sites are needed. There are signs that the irrational rush to build more data centers in the U.S.A. and elsewhere than will ever be needed -- and the economics of such investments -- are starting to be recognized by data center owners.

I live on a 100-acre fam located between Middletown and Jefferson, and object to the County's premature plan to change the zoning of high-quality Agricultural land to Industrial. Some day this change may be needed, but 2015 is not the time -- there are still several lots for data center construction available at the former Eastalco property, which the County has already dedicated to this use. Therefore: My Primary Recommendation is that you advise the County County (CC) to postpone actions to implement the CDI Overlay and alter zoning until such time that additional sites are needed. If this you decide that this sensible action is politically unacceptable, then my alternative recommendation is that you advise the CC to limit the Overlay to properties that are directly adjacent to the former Eastalco property. If in the future more properties are needed, the the overlay zone can be expanded.

Electricity to power any new data centers in Maryland will not be available until the mid-2030s, which is another reason data centers are not rushing to Maryland during 2025. Future water availability from the Potomac River during long periods of drought is another concern -- voters will be very upset if the County curtails water supply to homeowners and continues to send it to the data centers! Surely, the County will not go into debt to build a costly reservoir to be able to serve all water customers, will it? Five years ago the County rushed to accommodate -- in secret -- the desire of Amazon to quickly build a bunch of data centers on prime County properties. No one knew then how harmful data centers can be if they are not

adequately regulated and wisely sited. The folks in Loudoun County will soon suffer greatly for the mistakes County elected officials made over the past decade. I hope Frederick's officials are willing to proceed slowly and carefully: Five years ago our officials forgot the advice to "Look Before You Leap!" and rushed to approve the construction of data centers with minimal regulation (as officials in Loudoun County had earlier done). Some improvements in regulations have been done, but much more is needed.

With Best Wishes as you make critical decisions tomorrow,

Bill Steigelmenn
6113 Broad Run Road, Jefferson, MD 21755

From: [Elyse Wilson](#)
To: [Lewis Young, Karen Senator](#); [Folden, William Senator](#)
Cc: [Planning Commission](#); [Council Members](#); [Donald, Jerry](#); [Jeremy Baker -MDE-](#); [STEVE MCKAY](#); [Duckett, Kavonte](#); [Carter, Mason](#); [Hope Green](#); [rollbackfarmer@comcast.net](#); [Young, Brad](#); [Knapp, Renee](#); [Keegan-Ayer, MC](#); [Alex Lima -MDE-](#); [Fitzwater, Jessica](#); [Glotfely, Barry \(Health/EH\)](#); [Brookmyer, Barbara \(Health/Administration\)](#)
Subject: Other States Benefit Data Center Analysis-and Adamstown Water Investigation
Date: Tuesday, October 14, 2025 4:39:21 PM

[EXTERNAL EMAIL]

To Senators Karen Lewis-Young and Senator William Folden

I have spoken to **Jeremy Baker** (MDE), and he plans to have MDE staff conduct testing for residents and perform more comprehensive studies on the brownfield's effects on the community.

I have provided Jeremy Baker with photographic proof and he is coordinating a date for **MDE's Sewer and Water team** to visit the home of Gene Butler. They will see the proof in person and review all the pictures we have to show that the **water retention pond overflow from the Data Centers has never stopped**. The company simply cleans it up quickly to avoid being caught by MDE.

We are both **shocked and petrified** that some members of the Frederick County Council have proposed adding an **additional 1,700 acres**, bringing the total to **3,300 acres**. Where will the electricity and water come from? The Frederick Health Department cannot even manage the initial 1,600 acres, given the numerous violations you are aware of, and you know that **Catellus, which owns the Data Center land, is currently under another MDE investigation that cannot yet be made public**.

Last month, Senator Lewis-Young staff officer sent me information regarding the University of Maryland Drinking Water study for my town.

We had a meeting with **Rianna Murray and her team today**, and we learned that their study is nearly complete. Unfortunately, they are out of funding to perform the expansive level of testing our community around the Adamstown Data Center Area needs.

As a result, they agreed to conduct a drinking water study on **three residents**, but their process is quite thorough, so Rianna said the results will take approximately **six months** to return.

Tomorrow, we are attempting to show the **Frederick Planning Commission** what a terrible idea this expansion is. They are planning to remove huge swaths of Preservation and Agricultural Land.

Please see the attached proof. We urgently need your help to prevent them from ruining Frederick County, MD, with 3,300 acres of Data Centers, simply because there is no room left in Loudoun County, VA. You can use studies from other states to see what severe consequences could transpire if this expansion moves forward.

These Cost Benefit Data Center Analysis from these states are available now, please see below that can be used as a research base for Maryland.

If it can happen to their states it can happen to ours.

Yes, **Virginia** has conducted a recent, highly influential cost-benefit analysis of data centers that explicitly focuses on their massive consumption of water and electricity.

The study, commissioned by the **Virginia Joint Legislative Audit and Review Commission (JLARC)**, is a key resource for any jurisdiction considering data center expansion because it analyzes the environmental trade-offs alongside the economic benefits.

Key Findings of the Virginia JLARC Analysis:

The JLARC report offers a balanced view that moves beyond simple job creation numbers to address the utility constraints, which is exactly what you need for the Frederick Planning Commission meeting:

Impact Area	Virginia JLARC Finding	Relevance to Frederick, MD
Electricity Demand	Data center growth is the main driver causing the state's energy demand to potentially double within the next 10 years . Meeting this unconstrained demand will be "very challenging" and require substantial new generation and transmission infrastructure .	Directly addresses your concern about where the electricity for 3,300 acres will come from and the strain it will place on the grid.
Water Consumption	The report acknowledges that data centers consume substantial amounts of water, putting stress on local water supplies . The demand is forecast to increase by 170% by 2030 nationally, and the local impacts are severe, as seen in neighboring Loudoun County, VA.	Directly validates your concern about water scarcity and the massive volume of water required for cooling, especially in a state like Maryland near the Chesapeake Bay watershed.
Economic Benefits	Most economic benefits (jobs and GDP contribution) are concentrated during the construction phase (lasting 12–18 months). Once operational, the number of permanent staff jobs is relatively low for the size of the investment.	Helps argue that the long-term economic returns are often minimal compared to the long-term costs of subsidized infrastructure, water, and power.

Other States and Studies

While Virginia's report is the most prominent to incorporate detailed energy constraints, other states and organizations have produced reports that address resource usage:

- **Arizona & Ohio:** Reports for these states (often commissioned by industry groups like the Data Center Coalition) detail economic and environmental impacts, often providing metrics on energy use. Arizona, in particular, has faced public opposition over data centers consuming **millions of gallons of water per day** in a drought-prone region.
- **Illinois:** This state is notable because it ties its data center incentives to a mandate: qualifying facilities must demonstrate that they are **carbon neutral or meet a green building standard within two years** of being placed into service. This is a policy model Frederick County could consider.

Using the Virginia JLARC report will be particularly effective since it comes from a neighboring state that is already the global hub for data centers and is grappling with the unprecedented utility demands.

Best regards,

Elyse Wilson and the Coalition for safe drinking water in Frederick County

From: [Elyse Wilson](#)
To: [Planning Commission](#)
Cc: [Council Members](#); [STEVE MCKAY](#); [Donald, Jerry](#); [Duckett, Kavonte](#); [Carter, Mason](#); [Alex Lima -MDE-](#); [Jeremy Baker -MDE-](#); rollbackfarmer@comcast.net; [Hope Green](#); [Lewis Young](#); [Karen Senator](#); [Folden, William Senator](#)
Subject: Proposed Rezoning MAXIMIZES Impact on Adamstown: Stop Doubling Data Center Land Amid Spreading Contamination
Date: Tuesday, October 14, 2025 5:16:09 PM

[EXTERNAL EMAIL]

To the Frederick Planning Commission,

It is extremely difficult to accept the claim that the actions outlined in the "Summary of Recommendations" are intended to "minimize the impacts to Adamstown." When we analyze the maps and the official proposals, we feel the opposite is true: we are being deceived. The recommendations appear designed to **maximize industrial growth**, fundamentally betraying the goal of local preservation.

Here is a breakdown of how the official recommendations directly contradict the stated goal of minimizing community impact:

Recommendation Action	Contradiction of "Minimizing Impact"
Massive Industrial Rezoning (Recs 2, 3, & 4): The plan rezones large areas of Agricultural land to 'General Industrial' and 'Limited Industrial.'	This is the definition of <i>increasing</i> impact. Changing prime farmland to permanent industrial zones fundamentally and irreversibly alters the environment, character, and landscape of our rural community.
Creation of a Special Industrial Zone (Rec 7): The plan amends the zoning map to add a 'Critical Digital Infrastructure Overlay Zone.'	This measure formalizes and intensifies industrial impact. It creates a special district that prioritizes the needs of data centers (power, water, security) at the expense of residents who must live with the resulting noise, light pollution, and environmental side effects.
Stripping Away Land Protections (Rec 8): The plan calls for removing all properties in the growth area from the 'Rural Legacy Area and the Priority Preservation Area.'	This is not minimization; it is systematically dismantling the legal barriers designed to protect this land from high-impact development. The commission is actively removing the tools meant to <i>minimize</i> impact.
Expanding Utility Services for Industry (Rec 6): The plan changes the water and sewer classification from 'No Planned Service' to	This commits vast public resources (water and sewer infrastructure) to facilitate intense industrial development where it was never intended. This is a profound, long-term strain and a major impact on the region's total

'Planned Service.'

resource capacity.

Critical Environmental and Regulatory Failures

Before considering any expansion, the Commission must address the urgent and immediate regulatory failures already plaguing the current site:

1. **Water Scarcity and Strain:** How can this Commission justify an expansion from **1,600 acres to 3,300 acres** when there is no publicly confirmed analysis that Adamstown and South Frederick have the water capacity for the existing project?
2. **Current Violations and Corporate Accountability:** The company that owns the Data Center land, **Catellus**, is currently under a proven investigation by the MDE, as confirmed by MDE Director Jeremy Baker. **This is not the time to rush and approve a massive doubling of land for a company that is demonstrably failing to follow environmental rules and guidelines.**
3. **Spread of Contamination:** As a direct result of the existing issues, MDE Director Jeremy Baker confirmed he has increased MDE-Land inspections from every two weeks to **every single week** because they have noticed the **East Alcoa Superfund brownfield contamination spreading.**

Furthermore, Mr. Baker confirmed that MDE is now stepping in to start a new investigation into the **residential properties around the Data Centers**—a critical public health step the Frederick County Health Department has been unable to handle. The MDE is intervening because the existing local oversight has failed.

Conclusion and Demand

The **maps and the official recommendations are the strongest evidence** that the impact on Adamstown will be **PROFOUND and transformative, NOT minimal.**

Given the documented, ongoing environmental violations, the expansion of a Superfund brownfield, and the critical lack of public resource planning (water and electricity), **this is not the proper time to grow the area with more Data Centers.**

We demand that the Frederick Planning Commission leave the growth area unchanged. We urge you to consider the overwhelming and irreversible costs this expansion will impose on our community and Frederick County's future.

Sincerely,

Elyse Wilson

Adamstown MD

From: [Elyse Wilson](#)
To: [Planning Commission](#)
Cc: [Council Members](#); [STEVE MCKAY](#); [Donald, Jerry](#); [Duckett, Kavonte](#); [Carter, Mason](#); [Alex Lima -MDE-](#); [Jeremy Baker -MDE-](#); [rollbackfarmer@comcast.net](#); [Hope Green](#); [Lewis Young, Karen Senator](#); [Folden, William Senator](#); [Linda Everett](#); [strawder6101@verizon.net](#); [FRANK HOLLEWA](#); [Young, Brad](#); [Knapp, Renee](#); [Keegan-Ayer, MC](#); [County Executive](#); [Steve Black](#)
Subject: Re: Proposed Rezoning MAXIMIZES Impact on Adamstown: Stop Doubling Data Center Land Amid Spreading Contamination
Date: Tuesday, October 14, 2025 5:59:23 PM

[EXTERNAL EMAIL]

The Illusion of Mitigation:

The assertion by some officials, such as Councilman Brad Young, that Adamstown "**will never notice they are there**" is demonstrably false. The reality on the ground—captured in the attached photographs—is a clear violation of the mitigation promises made to this community and a shocking indictment of the self-regulation model.

The visual promises made to shield our community from this industrial zone have been completely ignored or minimized.

1. Failure to Construct Protective Berms

The planned **protective berms** and elevated screening structures meant to hide this massive complex are nowhere to be found.

- As seen in **BigUglyNoBermHere.jpg** and **BallengerDCNOBerm.jpg**, what residents actually face are unshielded, sprawling industrial warehouses and colossal electrical infrastructure projects completely dominating the horizon.
- **NoBerm2Mess.jpg** illustrates the messy, industrial reality on the immediate boundary, with construction materials and fencing directly abutting the streetscape, proving the buffers are entirely absent or ineffective.

2. Failure of Reforestation and Visual Screening

The commitment to replace natural buffers with meaningful reforestation has been reduced to a token, insufficient gesture:

- **CatellusReforestation.jpg** is a powerful visual document showing the so-called "reforestation effort." The industrial buildings stand fully exposed behind a line of sparse, young trees—what amounts to little more than "**Charlie Brown trees**" planted against the backdrop of an enormous industrial wall. This is an insult to the commitment that was made to replace the mature natural buffers we lost.

These failures are a direct result of the industry being allowed to "**police themselves**" and systematically ignore most of the Council's own guidelines. The current reality on the ground is a loud, highly visible industrial sprawl with virtually no effective mitigation.

We cannot trust this company to mitigate the impact of 3,300 acres when they have failed so completely to mitigate the visual and environmental impact of the first 1,600 acres. The visual evidence attached is our strongest argument against

approving any further expansion.

Elyse Wilson

On Tue, Oct 14, 2025 at 5:15 PM Elyse Wilson <elysewilsonkhk@gmail.com> wrote:

To the Frederick Planning Commission,

It is extremely difficult to accept the claim that the actions outlined in the "Summary of Recommendations" are intended to "minimize the impacts to Adamstown." When we analyze the maps and the official proposals, we feel the opposite is true: we are being deceived. The recommendations appear designed to **maximize industrial growth**, fundamentally betraying the goal of local preservation.

Here is a breakdown of how the official recommendations directly contradict the stated goal of minimizing community impact:

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Critical Environmental and Regulatory Failures

Before considering any expansion, the Commission must address the urgent and immediate regulatory failures already plaguing the current site:

1. **Water Scarcity and Strain:** How can this Commission justify an expansion from **1,600 acres to 3,300 acres** when there is no publicly confirmed analysis that Adamstown and South Frederick have the water capacity for the existing project?
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We demand that the Frederick Planning Commission leave the growth area unchanged. We urge you to consider the overwhelming and irreversible costs this expansion will impose on our community and Frederick County's future.

Sincerely,

Elyse Wilson

Adamstown MD