

From: Jennifer Staiger <staiger@msmary.edu>

Sent: Thursday, November 20, 2025 3:27 PM

To: Council Members <CouncilMembers@FrederickCountyMD.gov>

Subject: Vote to Expand the CDI Overlay: Protect 99% of the County While Growing Jobs & School Funding

[EXTERNAL EMAIL]

Dear Councilmember Councilmember,

As a Frederick County resident, I urge you to Expand the Critical Digital Infrastructure Overlay and Rezone the same area Industrial to maximize data center jobs and school funding.

An Expanded Overlay Rezoned Industrial is a win for Frederick County because:

- It limits data centers to less than 1% of the county's land and preserves 5 acres of farmland for every one acre of data center growth
- It will support Frederick jobs for Frederick residents during construction and operation of the Quantum Frederick campus, so more county residents can work closer to home instead of driving to Virginia
- It will provide an estimated \$215 million in annual tax revenue to help fund new schools and exceptional teachers for decades to come.
- It allows the county to comprehensively and thoughtfully plan for data centers now – rather than piecemeal in the future.

Please vote to Expand the CDI Overlay and Rezone Industrial. Doing so will maximize economic benefits from data center development while putting 99% of Frederick County off limits to data center growth.

Sincerely,

Jennifer Staiger  
2004 Benton Way  
Frederick, MD 21702  
staiger@msmary.edu

**From:** Carolyn Biggins <[cbiggins0421@gmail.com](mailto:cbiggins0421@gmail.com)>

**Sent:** Sunday, November 23, 2025 4:32 PM

**To:** Council Members <[CouncilMembers@FrederickCountyMD.gov](mailto:CouncilMembers@FrederickCountyMD.gov)>

**Cc:** Morris, Hope <[HMorris@FrederickCountyMD.gov](mailto:HMorris@FrederickCountyMD.gov)>; Fitzwater, Jessica <[JFitzwater@FrederickCountyMD.gov](mailto:JFitzwater@FrederickCountyMD.gov)>

**Subject:** comments CDI Overlay Zone for Dec. 16, 2025 public hearing

**[EXTERNAL EMAIL]**

Dear Members of the County Council:

I urge you not to approve the critical data infrastructure overlay. Adamstown is rich in Frederick County history, particularly our German agricultural and architectural history, and this overlay will take more properties out of the Rural Legacy Areas and degrade our agricultural areas and heritage. The Thomas house on the Windridge property was the home of J. Franklin Thomas, one of the founders of the Adamstown Canning Company and a great grandson of the settler, John Thomas. This farmhouse, purchased by J. Franklin from his father in 1877, was part of the 326-acre parcel his great-grandfather settled in the 1750s. It has been reviewed by planners for the Maryland Historic Trust twice and has been noted for its “ high level of integrity of architectural design and original construction and for its association with the early German settlement patterns of Frederick County.” We must not let the history and characteristics that make Frederick County unique be wiped out for future generations.

The Thomas family, one of the early farming families of Frederick County, came from Klein-Schifferstat on the west side of the river Rheine in Germany, arriving in Philadelphia in 1730 and making their way to Frederick County from 1742 to 1746. The Thomas brothers (Gabriel, Valentine, and John) bought land in and around Adamstown and Buckeystown.

The original Thomas family homestead, at 3710 Cap Stine Rd., and the J. Franklin Thomas farm at 3681 Cap Stine Rd. (Windridge) were homes of the original founders and their great-grandsons, men who founded the Adamstown Canning & Supply Company, a business that grew into more canneries in downtown Frederick and in Gaithersburg, and the Frederick Trading Company. Upon his passing, G. Frank Thomas left a foundation that to this day supports education and humanitarian efforts in our county.

Already the building of data centers on the East Alcoa site has robbed Adamstown of its quiet, rural nature. The monoliths light up the night sky, wiping out our easy view of stars, meteor showers, and other planets. What was once a beautiful country drive on Ballenger Creek and Mountville Road, full of old farmhouses and fields and pastures, is now filled with humongous, concrete buildings abuzz with activity 24 hours a day. When the construction finally stops, the generators will kick in, robbing Adamstown and Doubs of the quiet and peacefulness we have enjoyed in this beautiful county.



Old buildings are reminders of our county's culture and complexity. They give us a sense of permanency and heritage. Tearing down these historic houses to pave the way for data centers robs future generations of their cultural legacy. These farms are important to the County. These fields are rich and fertile. If you expand the data center overlay, you will be erasing a significant part of Frederick County history.

Data centers are known to increase energy costs for residents, increase air pollution, impact wells, and have negative health impacts from noise and pollution for its extant and adjacent communities. While your approval of this overlay may result in more tax dollars, this action will negatively impact your residents, communities, and the character of our county. There is no chance to save a piece of history once it is gone forever.

Please vote against this overlay and do not expand the acres eligible for data center development. You have one chance to be the steward of history. This is your watch.

Carolyn Biggins

Adamstown

From: Robert Stevens <[pbookbob@icloud.com](mailto:pbookbob@icloud.com)>

Sent: Tuesday, November 25, 2025 9:51 PM

To: County Executive <[CountyExecutive@FrederickCountyMD.gov](mailto:CountyExecutive@FrederickCountyMD.gov)>

Subject: Adamstown Data Centers

[EXTERNAL EMAIL]

Ms Fitzwater,

Before the County makes a determination of the outcome concerning data centers and further rezoning of southwest Frederick County please take another drive around this area. We would hope that they will protect and keep open space and agriculture land close to the villages of Adamstown and Buckeystown and Point of Rocks. Perhaps any increased industrial rezoning expansion could be offset by rezoning and making agricultural areas such as those close to schools, churches and housing? A trade.? The areas North of Ballenger Creek Rd between Cap Stein and Manor Woods Rd up to Route 15 already have Industry. There is plenty of open space close and just south 15. If the county is wanting a limit of 1% for such projects perhaps it should not all be in the same area?

Please forward to the appropriate site so it can be given consideration at the next rezoning meeting.

Thank you,

Robert and Alma Stevens

Adamstown

**From:** Nick Ring <nring3@gmail.com>

**Sent:** Monday, November 24, 2025 10:47 PM

**To:** Council Members <CouncilMembers@FrederickCountyMD.gov>

**Subject:** limiting the CDI overlay zone

**[EXTERNAL EMAIL]**

Hello Council members,

I am writing to you to please limit the CDI overlay zone as much as possible. This is not an essential utility, and it will not improve internet services for the residents of Frederick. It will be a drain on our resources, increase taxes and utility costs, pollute our people, water, land, and wildlife, and benefit only specific corporations. The fact that PFA exhaust and wastewater comes out of these buildings into the air and into our water should be enough to stop plans for construction, but unfortunately we live in a world that prioritizes money over health, and today's "business" over the future. Let's not be part of the problem.

Please limit the CDI zone as much as possible, leave the farmers alone, and, if possible, revoke contracts and completely stop construction on this waste factory.

Thank you for your time.

**From:** susanj <addsusan@gmail.com>

**Sent:** Tuesday, November 25, 2025 9:10 AM

**To:** Council Members <CouncilMembers@FrederickCountyMD.gov>

**Subject:** CDI Schedule

**[EXTERNAL EMAIL]**

This entire council should be ashamed of itself for scheduling the vote on one of the most important Bills (CDI overlay) for Dec 23 which happens to be two days before one of the most important religious holidays in the world. A time when many people travel to be with family and others want to reflect on the beauty of the season.

Susan Jiacinto

Frederick

**From:** Soo Lee-Cho <[sleecho@bregmanlaw.com](mailto:sleecho@bregmanlaw.com)>

**Sent:** Tuesday, November 25, 2025 5:50 PM

**To:** Council Members <[CouncilMembers@FrederickCountyMD.gov](mailto:CouncilMembers@FrederickCountyMD.gov)>; Young, Brad <[BYoung@FrederickCountyMD.gov](mailto:BYoung@FrederickCountyMD.gov)>; McKay, Steve <[SMcKay@FrederickCountyMD.gov](mailto:SMcKay@FrederickCountyMD.gov)>; Carter, Mason <[MCarter@FrederickCountyMD.gov](mailto:MCarter@FrederickCountyMD.gov)>; Donald, Jerry <[JDonald@FrederickCountyMD.gov](mailto:JDonald@FrederickCountyMD.gov)>; Knapp, Renee <[RKnapp@FrederickCountyMD.gov](mailto:RKnapp@FrederickCountyMD.gov)>; Keegan-Ayer, MC <[MCKeegan-Ayer@FrederickCountyMD.gov](mailto:MCKeegan-Ayer@FrederickCountyMD.gov)>; Duckett, Kavonte <[KDuckett@FrederickCountyMD.gov](mailto:KDuckett@FrederickCountyMD.gov)>

**Cc:** Cherney, Ragen <[RCherney@FrederickCountyMD.gov](mailto:RCherney@FrederickCountyMD.gov)>; Gaines, Kimberly <[KGaines@FrederickCountyMD.gov](mailto:KGaines@FrederickCountyMD.gov)>; Mitchell, Kathy (Legal) <[KMitchell2@FrederickCountyMD.gov](mailto:KMitchell2@FrederickCountyMD.gov)>; William Rogers <[wrogers@bregmanlaw.com](mailto:wrogers@bregmanlaw.com)>; Jeanne Geisinger <[jmg51654@gmail.com](mailto:jmg51654@gmail.com)>; Patricia Geisinger <[patg123000@aol.com](mailto:patg123000@aol.com)>; 'Gary Geisinger' <[geisingermachine@innernet.net](mailto:geisingermachine@innernet.net)>; 'Danny & Marie Geisinger' <[danny.geisinger@aol.com](mailto:danny.geisinger@aol.com)>; 'Kathy Wolfe' <[midmaryland86@gmail.com](mailto:midmaryland86@gmail.com)>

**Subject:** December 2, 2025 Council Agenda Item: CDI-Overlay Zone / Comprehensive Plan Amendment - GEISINGER NORTH

**[EXTERNAL EMAIL]**

Council President Young and Members of the Council:

In advance of the Council's Workshop session scheduled for December 2, 2025 on the proposed CDI-Overlay Zone and related Living Frederick Comprehensive Plan Amendment, please find attached letter and exhibits for your review/consideration submitted on behalf of the Geisinger Family Trust, Geisinger Credit Trust, and the individual members of the Geisinger family.

Thank you.

Soo



Soo Lee-Cho

BREGMAN, BERBERT, SCHWARTZ & GILDAY, LLC

7315 Wisconsin Avenue, Suite 800 West

Bethesda, Maryland 20814

301-656-2707 x5902 **PHONE** | 301-961-6525 **FAX** | 301-318-3884 **MOBILE**

Email: [sleecho@bregmanlaw.com](mailto:sleecho@bregmanlaw.com)

[www.bregmanlaw.com](http://www.bregmanlaw.com)

November 25, 2025

Brad Young, Council President  
Frederick County Council  
12 E. Church Street  
Frederick, MD 21701

**Re: Critical Digital Infrastructure Overlay Zone (“CDI-OZ”) Draft Comprehensive Plan Amendment (“Draft Plan”) – GEISINGER NORTH – Request for Inclusion in the CDI-OZ and Reclassification to the Light Industrial (LI) Zone**

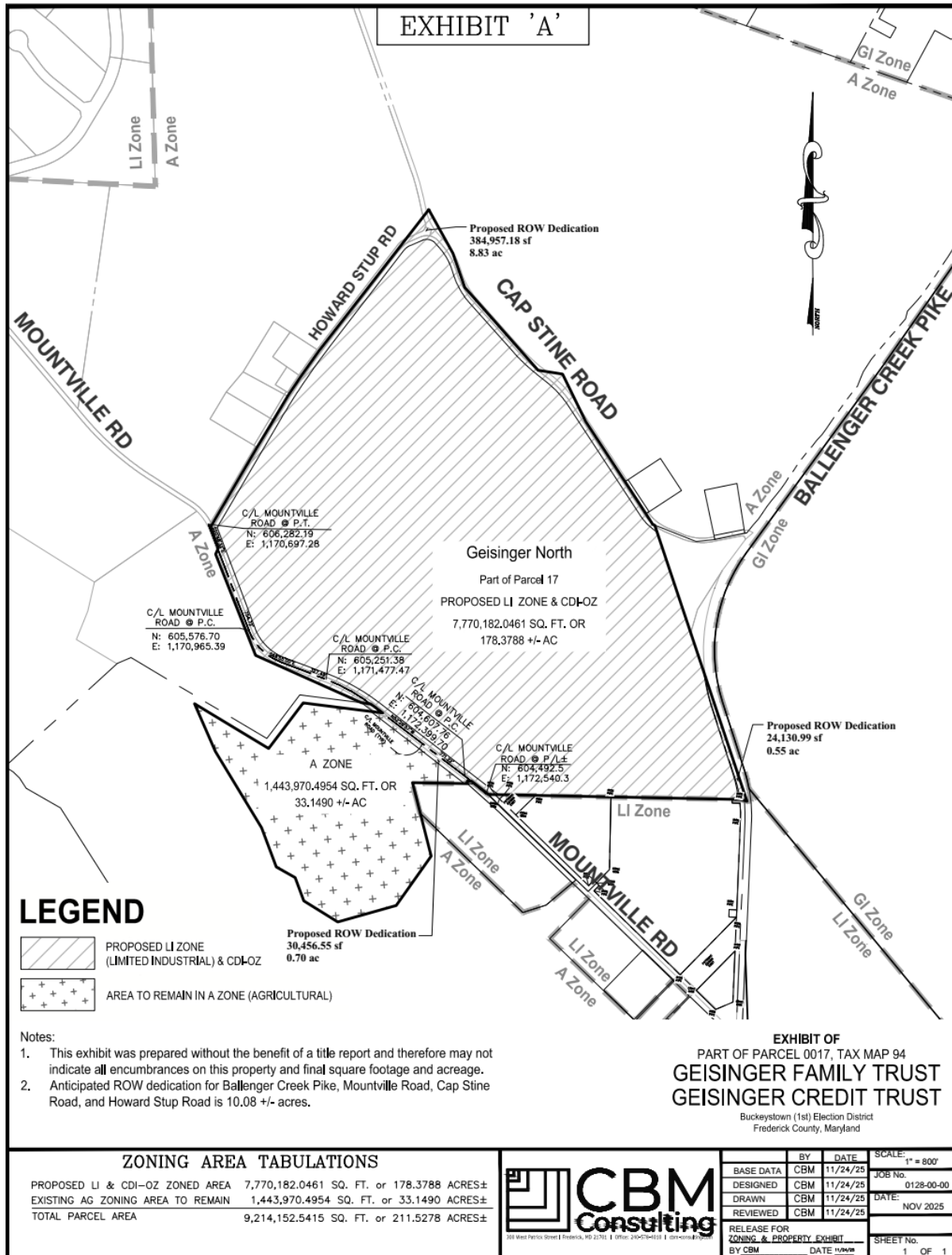
Dear Council President Young and Members of the Council:

This firm represents the Geisinger Family Trust and the Geisinger Credit Trust (together the “Geisinger Trusts” or “Trusts”), co-owners of land totaling  $\pm 211.527$  acres located at 3710 Cap Stine Road that are separated by Mountville Road. The portion of the property north of Mountville Road consists of  $\pm 178.378$  acres of land, while the portion south of Mountville Road consists of  $\pm 33.149$  acres of land. The following letter is hereby submitted on behalf of the Trusts as well as individual family members, Jeanne Geisinger, Kathleen Wolfe, Daniel Geisinger, Jeff Geisinger and Gary Geisinger (together the “Geisinger Family”).

The Trusts and the Geisinger Family jointly request that the County Council take the following actions only with respect to the **178.378-acre portion of the family’s property located north of Mountville Road**, separately surveyed/described on **Exhibit A** and referenced herein as “**Geisinger North**”:

- Include **Geisinger North** in the CDI-Overlay
- Amend the Comprehensive Plan Map to change the land use designation for **Geisinger North** from Agricultural to Limited Industrial.
- Reclassify **Geisinger North** from the Agricultural (A) Zone to the Light Industrial (LI) Zone.
- Remove **Geisinger North** from the Rural Legacy Area and Priority Preservation Area.
- Include the **Geisinger North** within the Community Growth Area limits.
- Change the Water and Sewer Service Area Category for **Geisinger North** from no Planned Service to Planned Service.

Geisinger North logically completes the data center hub being envisioned for the CDI-Overlay by the County on properties that have historically been designated for industrial use such as Geisinger North and not otherwise restricted by binding agricultural easements. Geisinger North meets both criteria and couldn’t be more ideally suited for data center development. It sits *north* of Mountville Road and immediately *west* of the Eastalco property that is currently an active data center construction site.





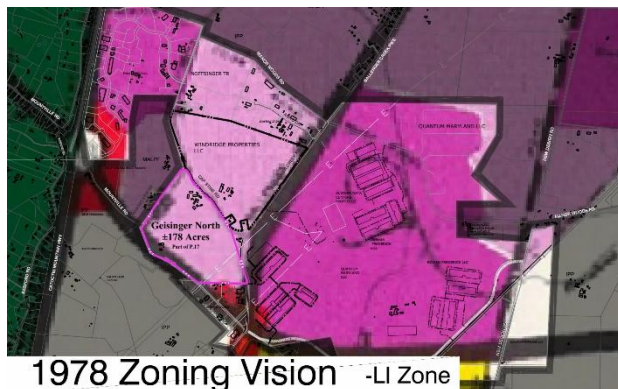
November 25, 2025

## CDI-OVERLAY + LI ZONE – GEISINGER NORTH

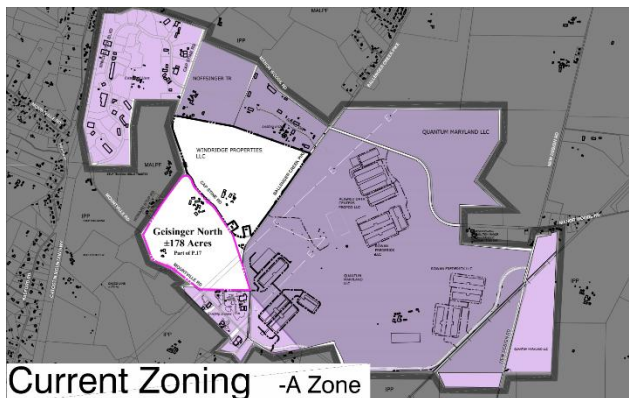
Page 3

The zoning history of the Geisinger Family property, depicted on **Exhibit B** attached hereto and excerpt below, is worth revisiting. Geisinger North was industrially zoned at the time the family purchased the property in 1981, which was consistent with the County's 1978 zoning vision for the property and the surrounding area. The subsequent down-zoning of the property by the County to the Agricultural Zone that occurred in 2010 is something the family deeply regrets they were unable to fight at the time due to the failing health of their mother. The family seeks to have the industrially zoning, that in their view was unjustifiably taken away, rightfully restored to Geisinger North through the current process but has tailored their request for rezoning herein, *to leave the 33.149-acre portion of the property located south of Mountville Road in the Agricultural Zone and outside the CDI-Overlay* to serve as a protective buffer for neighboring property owners to the south who have chosen to subject their properties to agricultural easements.

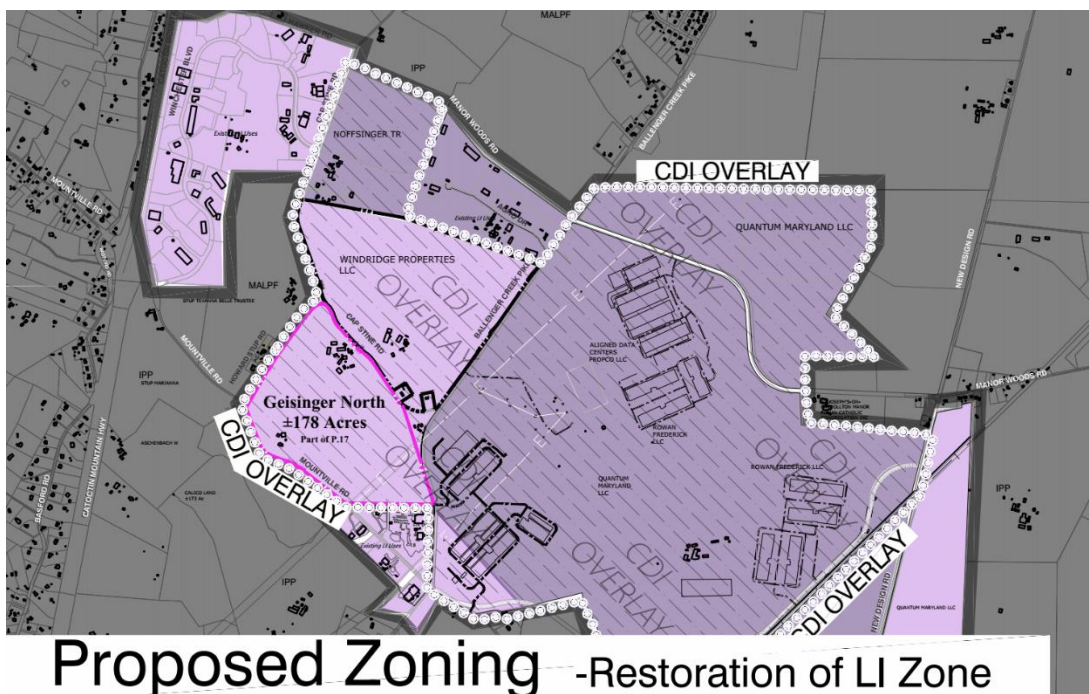
### Geisinger North Zoning History



1978 Zoning Vision -LI Zone



Current Zoning -A Zone



Proposed Zoning -Restoration of LI Zone



Aside from its zoning history, the reasons to include Geisinger North in the CDI-Overlay could not be more obvious. It is ideally situated, like no other property being considered by the Council, to serve as a data center campus due to its adjacency to necessary utility infrastructure necessary to support data center use, immediate access to the regional transportation network, and ability to meet all compatibility criteria established by the County, including enhancement of green infrastructure, as detailed further below.

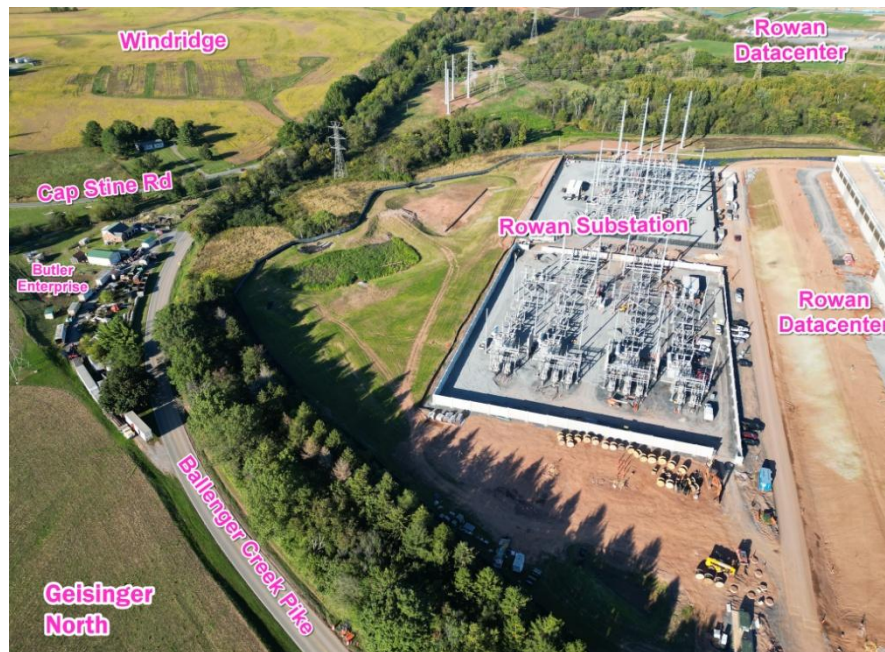
### **Compliance with County Criteria for Data Center Development**

Based on a comprehensive review of information published by the County regarding siting of data centers, there are five key criteria that are used to justify development of a data center on a given property. Geisinger North meets all five criteria, and accordingly, is a logical addition to the CDI-OZ. The Geisinger Family engaged the assistance of land planning professionals to comprehensively evaluate the property's compliance with the County's criteria for data center development and analyze its adjacency to available utility infrastructure. CBM Consulting has prepared a number of exhibits to exemplify why Geisinger North is ideally situated for inclusion in the CDI-OZ and rezoning to the LI Zone to facilitate data center development.

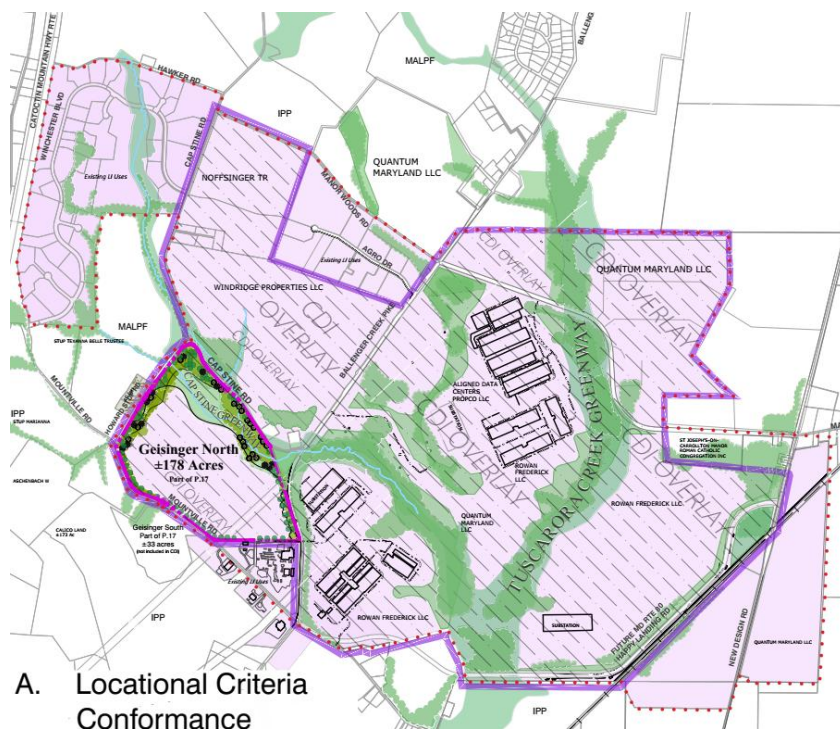
#### **A. Locational Criteria**

Geisinger North sits directly adjacent to an existing data center complex under construction on the Rowan Frederick LLC property located off Ballenger Creek Pike. Aerial drone views were taken from a vantage point above Geisinger North looking to the east, as indicated below. (Attached as **Exhibit C**). Not only does the Rowan data center across Ballenger Creek Pike exist today, there are other long-standing light industrial uses (i.e., Builders FirstSource) that exist immediately adjacent to Geisinger North's southern boundary along Mountville Road. Additional photographs demonstrating the prevalence of surrounding data center development, other industrial activity in the area and general site/neighborhood context are provided on **Exhibit D**.





Moreover, while Bill No. 25-09 limits the total land area of the County to be included in the CDI-OZ to 1%, the Planning Commission’s recommendation for the CDI-OZ included only 0.37% of the County’s total land area. In any case, adding Geisinger North to the CDI-OZ would only result in an increase of **.04%**. This is a minor increase to the total land area being proposed for inclusion in the CDI-OZ and would result in a total CDI-OZ area that is far below the 1% limit set by the County.





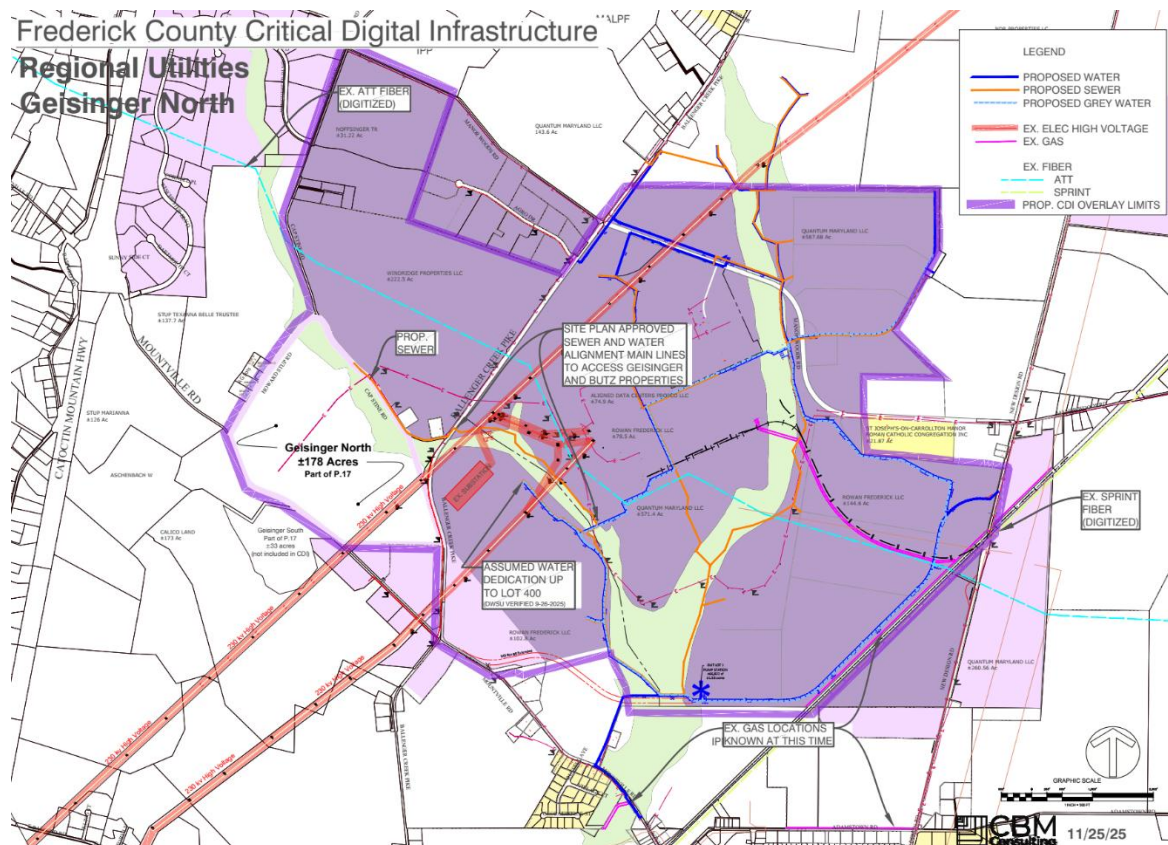
## B. Adjacency to Regional Utility Infrastructure

As members of the Geisinger Family have testified in the past, Geisinger North has better access to regional utility infrastructure than many of the properties currently being considered for inclusion in the CDI-OZ as depicted on **Exhibit E**, excerpted below.

- **Power:** High voltage power is obviously necessary for data center operations. Geisinger North benefits from already having two high voltage towers located on site.
- **Water/Sewer:** Data center sites also need access to public water and sewer service. Easements have already been recorded for both planned water and sewer lines to Ballenger Creek Pike from which existing Ballenger Creek Pike and Cap Stine Road right of ways can be utilized to easily extend service to Geisinger North.
- **Telecom:** Geisinger North sits less than 1,000 feet from the existing AT&T fiber optic line to the north which crosses over existing right of ways from which connectivity can be achieved.

In sum, Geisinger North is ideally situated to take advantage of the various existing and planned infrastructure for data center development in this area in a way few other properties can match.

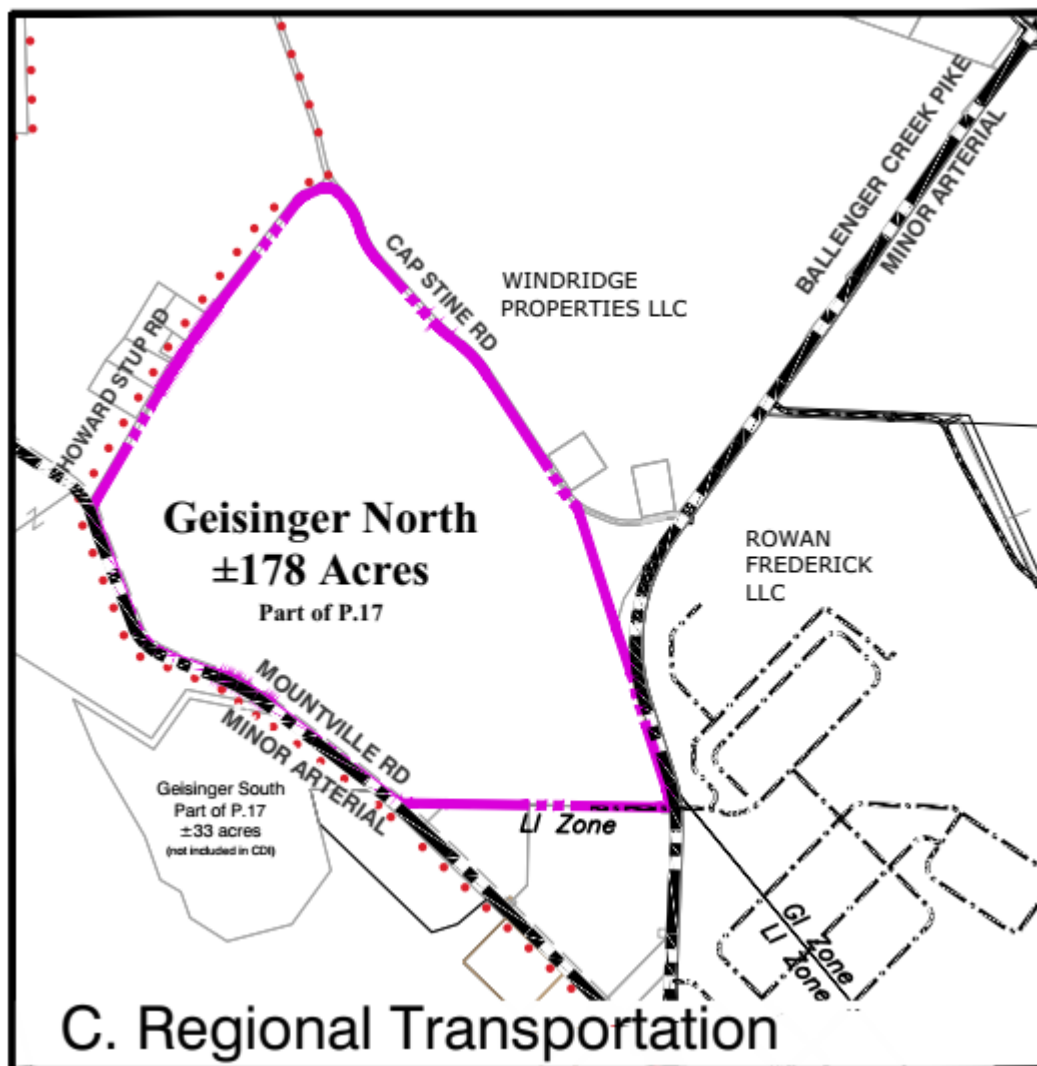
### *Excerpt of Exhibit E*



### **C. Regional Transportation**

Geisinger North has the advantage of fronting on three roadways: Mountville Road to the south, Ballenger Creek Pike to the east and Cap Stine Road to the northeast. Both Mountville Road and Ballenger Creek Pike are master planned as minor arterials off of which workable access points to the site can be achieved without creating a strain on the local transportation network. Preliminarily, it appears that a logical access point for the property could be off Ballenger Creek Pike at the southeast corner of the property, one that can easily be aligned with the access drive planned for the Rowan data center.

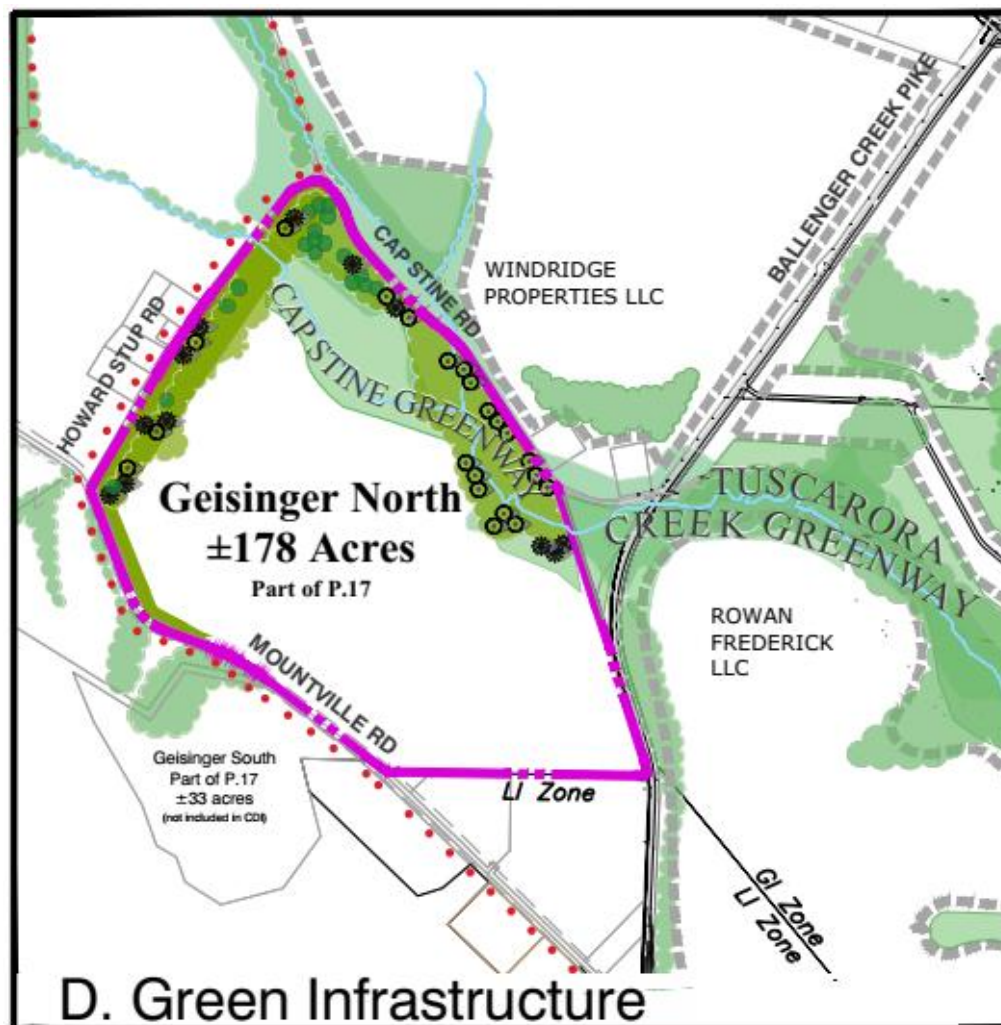
*Excerpt from Exhibit F*



#### **D. Green Infrastructure**

Geisinger North provides substantial opportunity for development of green infrastructure that can coexist with data center uses and serve the dual purpose of providing important buffering of a data center facility to surrounding properties. A tributary of Tuscarora Creek is a prominent environmental feature in the northeastern area of Geisinger North near Cap Stine Road – an area of the property that currently houses various farm structures/facilities. This area of the property could be protected and enhanced as a greenway buffer (as shown below) that extends along the property's Howard Stup Road frontage in conjunction with any data center development on the site – providing an opportunity to create a unique greenway amenity for this area of the County.

*Excerpt from Exhibit F*



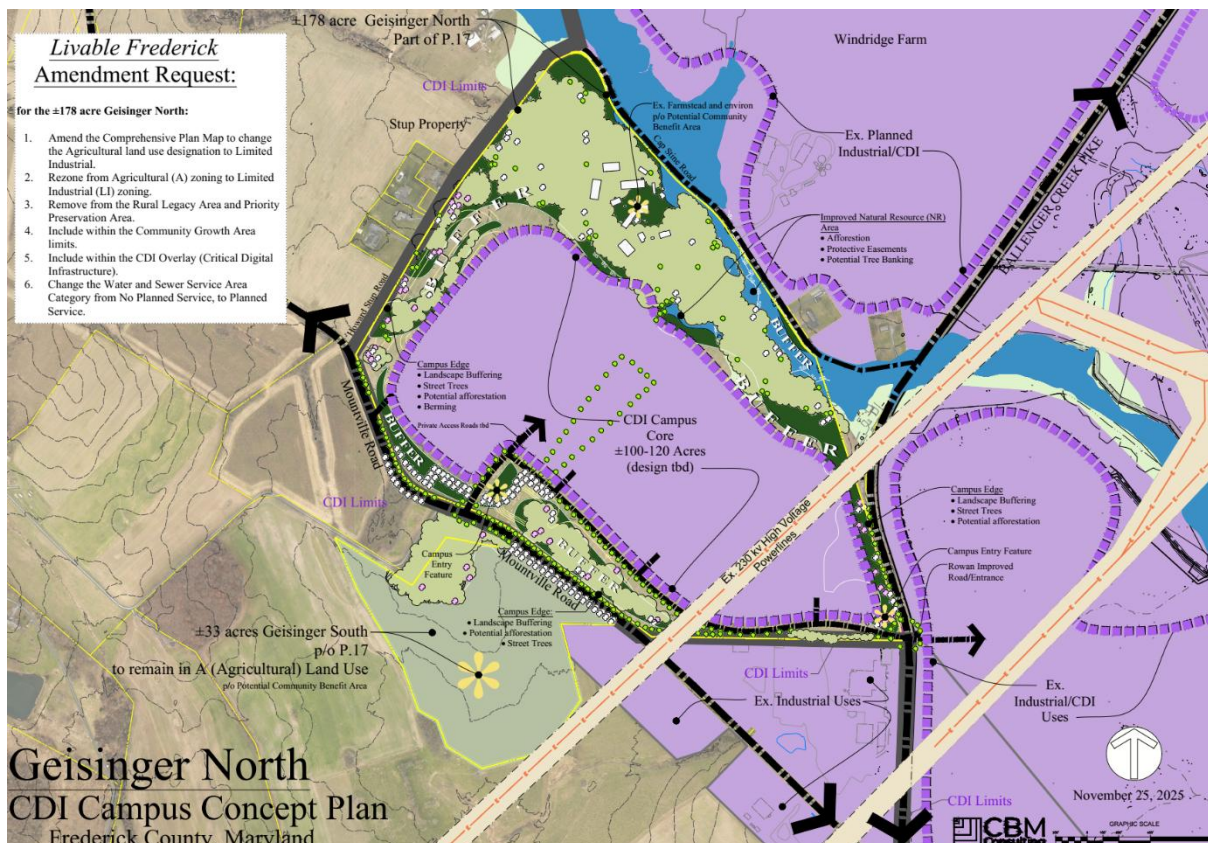


## E. Compatibility

As has already been noted, several properties adjacent to Geisinger North are already included in the CDI-OZ, and a nearly complete substation and data center complex already exist on the Rowan property (formerly Eastalco) directly across Ballenger Creek Pike. Additionally, the Builder's FirstSource property located immediately adjacent to the southern boundary of Geisinger North along Mountville Road already engages in significant commercial operations.

While the property's existing context contributes to the compatibility of data center use, Geisinger North will offer an opportunity to provide significant landscape buffers, berms and greenway amenities that can serve to substantially lessen the impact of data center operations on surrounding properties that are already having impacts. As described above, the creation of the Cap Stine Greenway area along the northern and western property lines can provide both green infrastructure and significant buffering from visual and noise impacts. Moreover, preliminary assessments show that data center buildings and related facilities may be sited on the property to be well below the elevation of the surrounding roadways, maximizing the effectiveness of landscape buffers and berms, while still meeting engineering requirements to facilitate gravity sewer.

CBM Consulting has prepared a preliminary Concept Plan for a CDI Campus on Geisinger North (excerpted below and attached hereto as **Exhibit G**) that the family is confident will meet/exceed the County's compatibility standards.

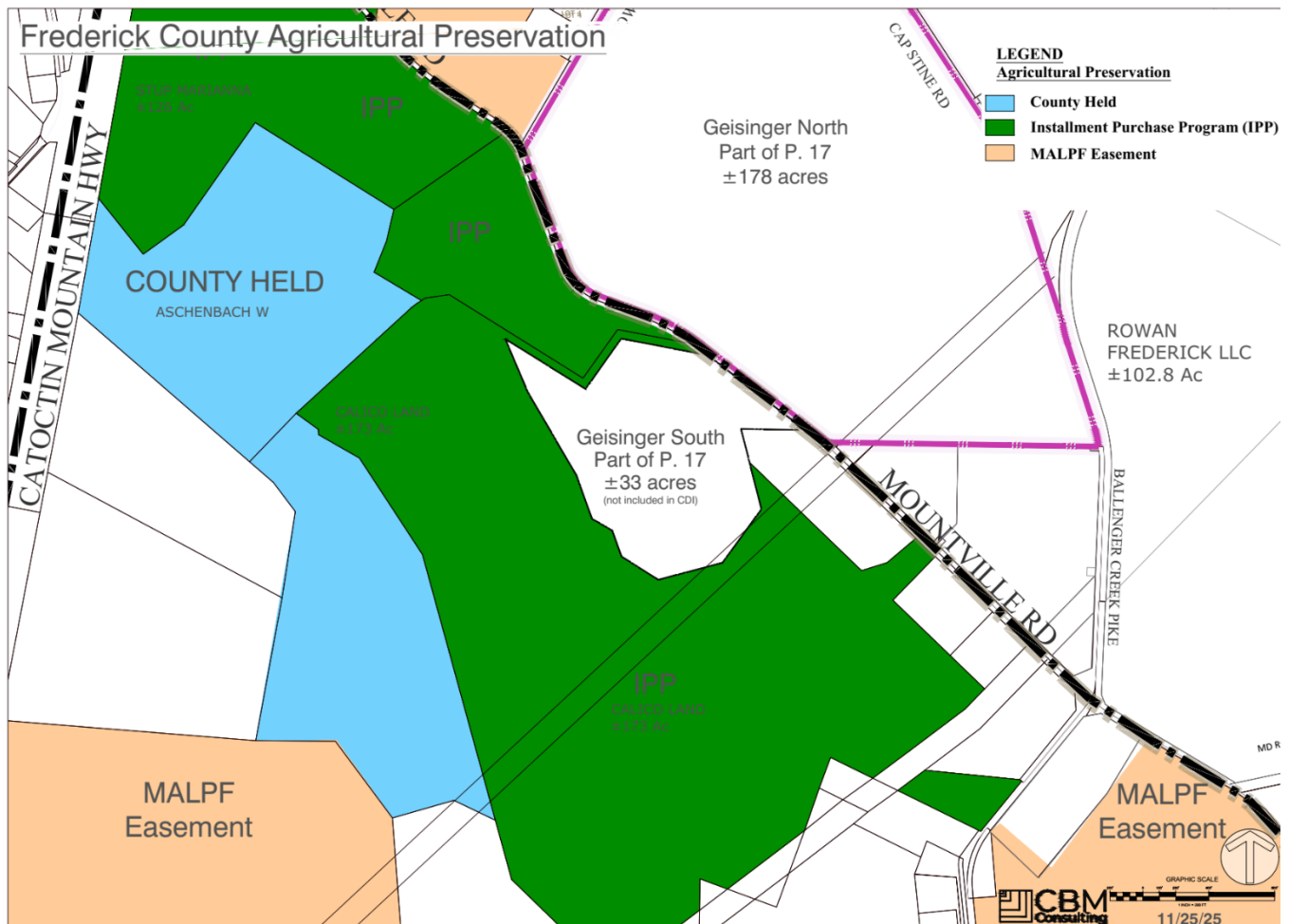


November 25, 2025

CDI-OVERLAY + LI ZONE – GEISINGER NORTH

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In addition to compliance with compatibility standards on Geisinger North itself, the remaining 33.149-acres of land located south of Mountville Road will provide unique preservation opportunities that could further address concerns expressed by the surrounding community at public meetings/hearings concerning potential data center sprawl. This portion of the Geisinger land holdings is proposed to retain its Agricultural zoning and serve as a buffer to properties south of Mountville Road in agricultural use that are currently either county owned or protected through various agricultural preservation programs, as depicted below (see **Exhibit H**).



## Conclusion

Based on all the above, the Trusts and the Geisinger Family request that the County Council vote to ***include Geisinger North (depicted on Exhibit A as limited to the 178.378-acre area of land located north of Mountville Road) into the CDI-OZ AND take action to reclassify Geisinger North to Light Industrial (LI) zoning in conjunction with the current process.***

Requiring landowners to process a separate local map amendment application after being included in the CDI-Overlay makes no sense. It would only serve to impose a significant burden and risk on individual landowners that then could result in undermining the County's goals for enacting the CDI-Overlay in the first place. If the Council determines that a particular property is in fact appropriate for data center development and approves its inclusion in the CDI-Overlay, then the requisite zoning (for Geisinger North being the LI Zone) that is needed to implement data center development should be comprehensively enacted – allowing landowners to proceed with preparing detailed development plans for review/approval and to engage in public benefit agreement negotiations early and reduce uncertainty. To do anything else could render the Council's action on the CDI-Overlay nugatory.

In sum, Geisinger North meets or exceeds all of the criteria that have been set forth by the County as factors to be considered for inclusion in the CDI-OZ and to be granted the requisite LI zoning to implement data center use on the property. Under these circumstances, any recommendation other than to include Geisinger North in the CDI-OZ would be arbitrary and clearly contrary to the County's own guidelines.

The Geisinger Family respectfully requests the Council's favorable consideration and looks forward to participating in the Council's workshop and public hearing process on this matter.

Sincerely yours,

BREGMAN, BERBERT, SCHWARTZ & GILDAY, LLC

By:



Soo Lee-Cho

## Attachments:

- Exhibit A – Geisinger North\_Boundary + Proposed Zoning
- Exhibit B – Geisinger North\_Historic Zoning
- Exhibit C – Aerial Drove Views
- Exhibit D – Geisinger North\_Site Neighborhood Context
- Exhibit E – Geisinger North\_Regional Utility Infrastructure
- Exhibit F – County CDI-OZ Guardrails Compliance
- Exhibit G – Geisinger North\_CDI Campus Concept Plan
- Exhibit H – Ag Preservation Map



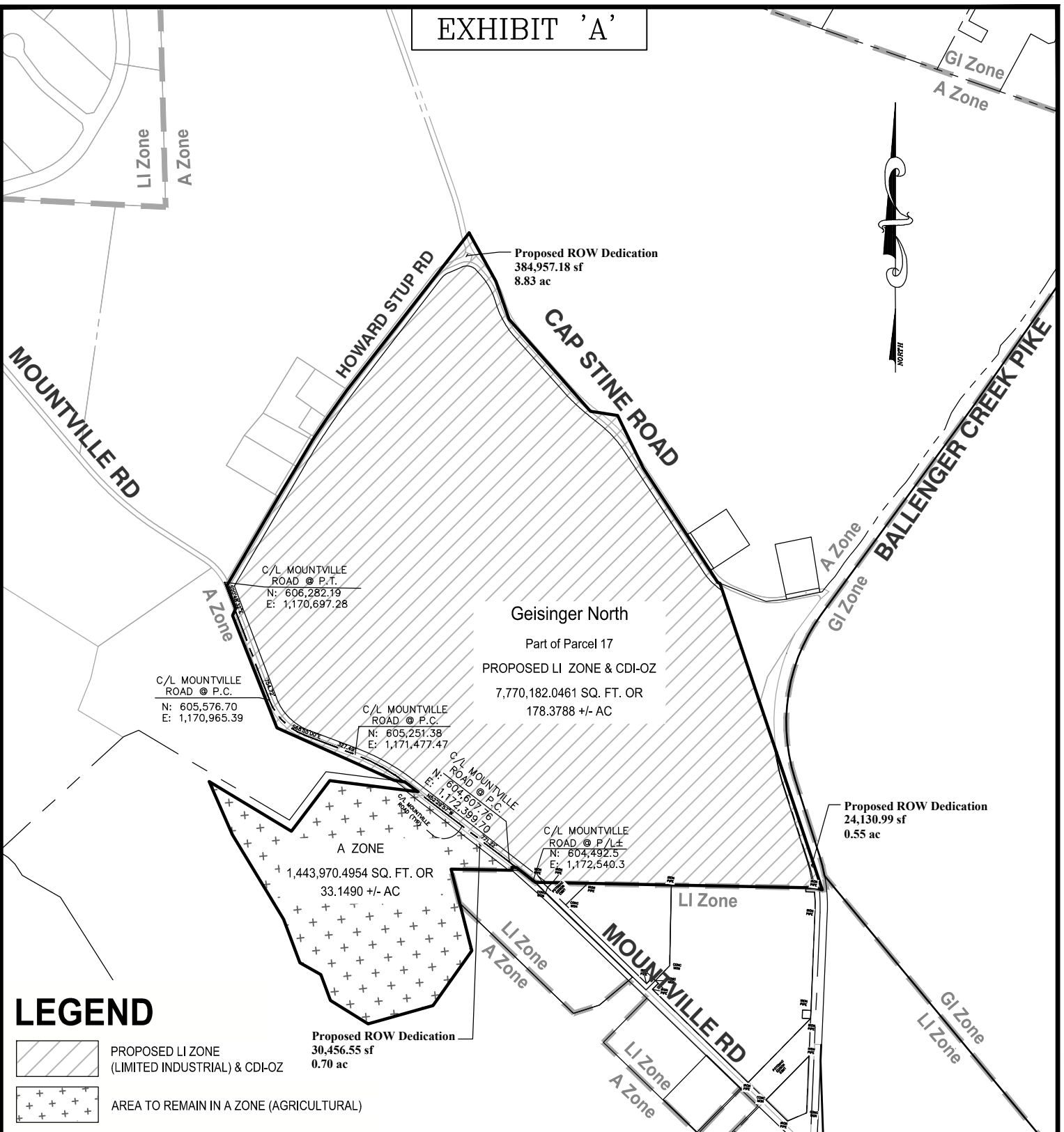
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CDI-OVERLAY + LI ZONE – GEISINGER NORTH

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cc: Geisinger Family Trust  
Geisinger Credit Trust  
Jeanne Geisinger  
Kathleen Wolfe  
Gary Geisinger  
Jeff Geisinger  
Daniel Geisinger  
William J. Rogers, Esq.

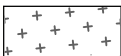
# EXHIBIT 'A'



## LEGEND



PROPOSED LI ZONE  
(LIMITED INDUSTRIAL) & CDI-OZ



AREA TO REMAIN IN A ZONE (AGRICULTURAL)

### Notes:

- This exhibit was prepared without the benefit of a title report and therefore may not indicate all encumbrances on this property and final square footage and acreage.
- Anticipated ROW dedication for Ballenger Creek Pike, Mountville Road, Cap Stine Road, and Howard Stup Road is 10.08 +/- acres.

## EXHIBIT OF PART OF PARCEL 0017, TAX MAP 94 GEISINGER FAMILY TRUST GEISINGER CREDIT TRUST

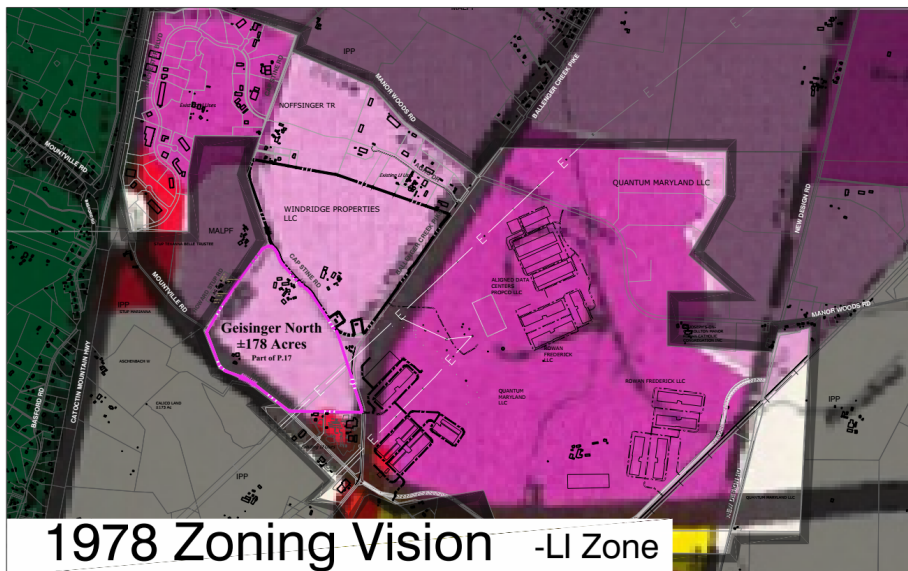
Buckeystown (1st) Election District  
Frederick County, Maryland

### ZONING AREA TABULATIONS

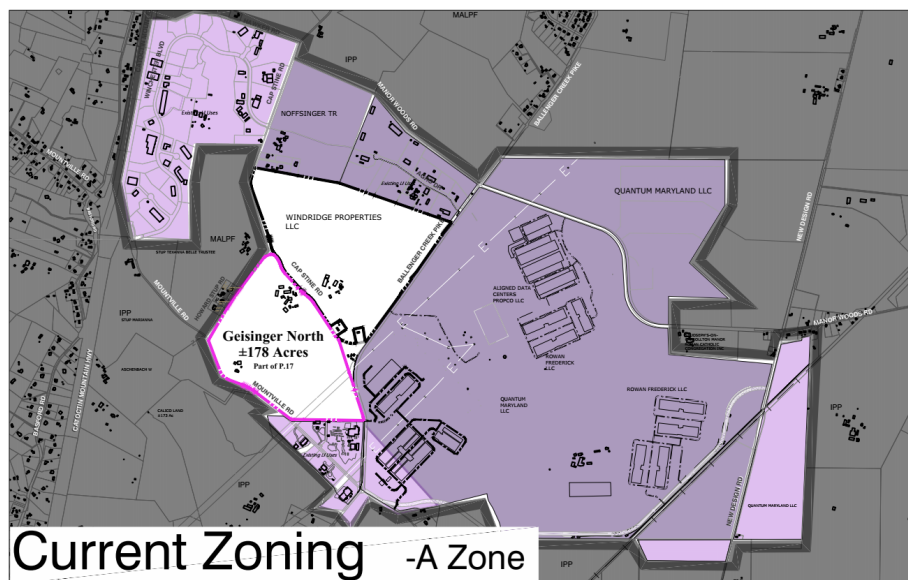
PROPOSED LI & CDI-OZ ZONED AREA	7,770,182.0461 SQ. FT. or 178.3788 ACRES±
EXISTING AG ZONING AREA TO REMAIN	1,443,970.4954 SQ. FT. or 33.1490 ACRES±
TOTAL PARCEL AREA	9,214,152.5415 SQ. FT. or 211.5278 ACRES±



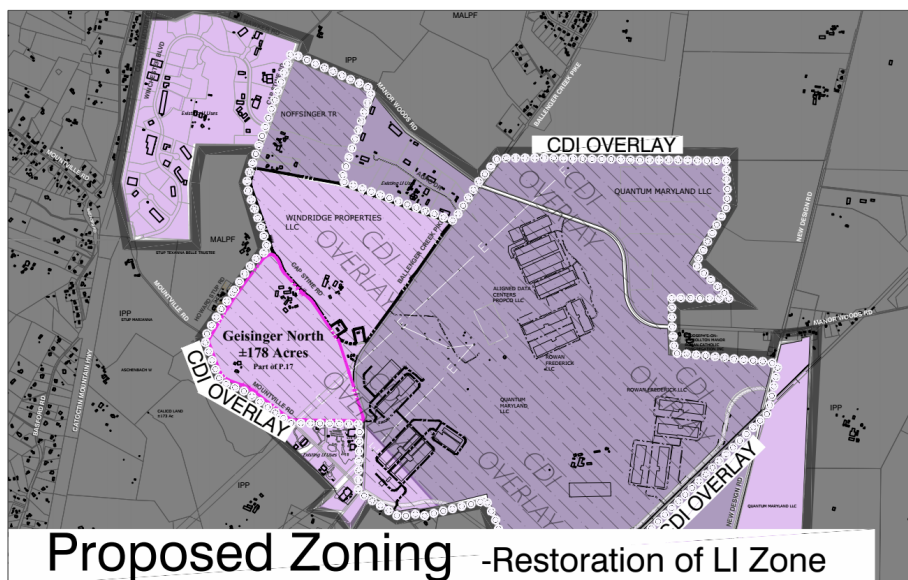
	BY	DATE	SCALE: 1" = 800'
BASE DATA	CBM	11/24/25	JOB No. 0128-00-00
DESIGNED	CBM	11/24/25	DATE: NOV 2025
DRAWN	CBM	11/24/25	
REVIEWED	CBM	11/24/25	
RELEASE FOR ZONING & PROPERTY EXHIBIT			SHEET No. 1 OF 1
BY CBM DATE 11/24/25			



1978 Zoning Vision -LI Zone



Current Zoning -A Zone



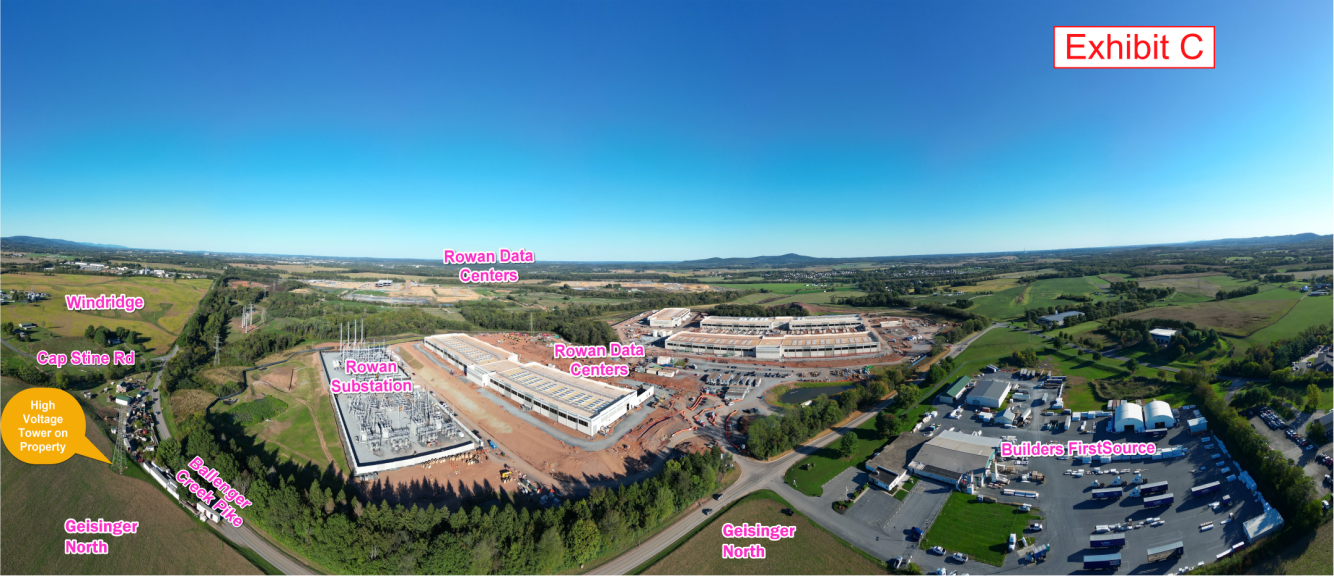
Proposed Zoning -Restoration of LI Zone

Geisinger North

Zoning History



# Exhibit C



Rowan Data  
Centers

Rowan Data  
Centers

Rowan  
Substation

Builders FirstSource

Geislinger  
North

Geislinger  
North

Ballenger  
Creek Pike

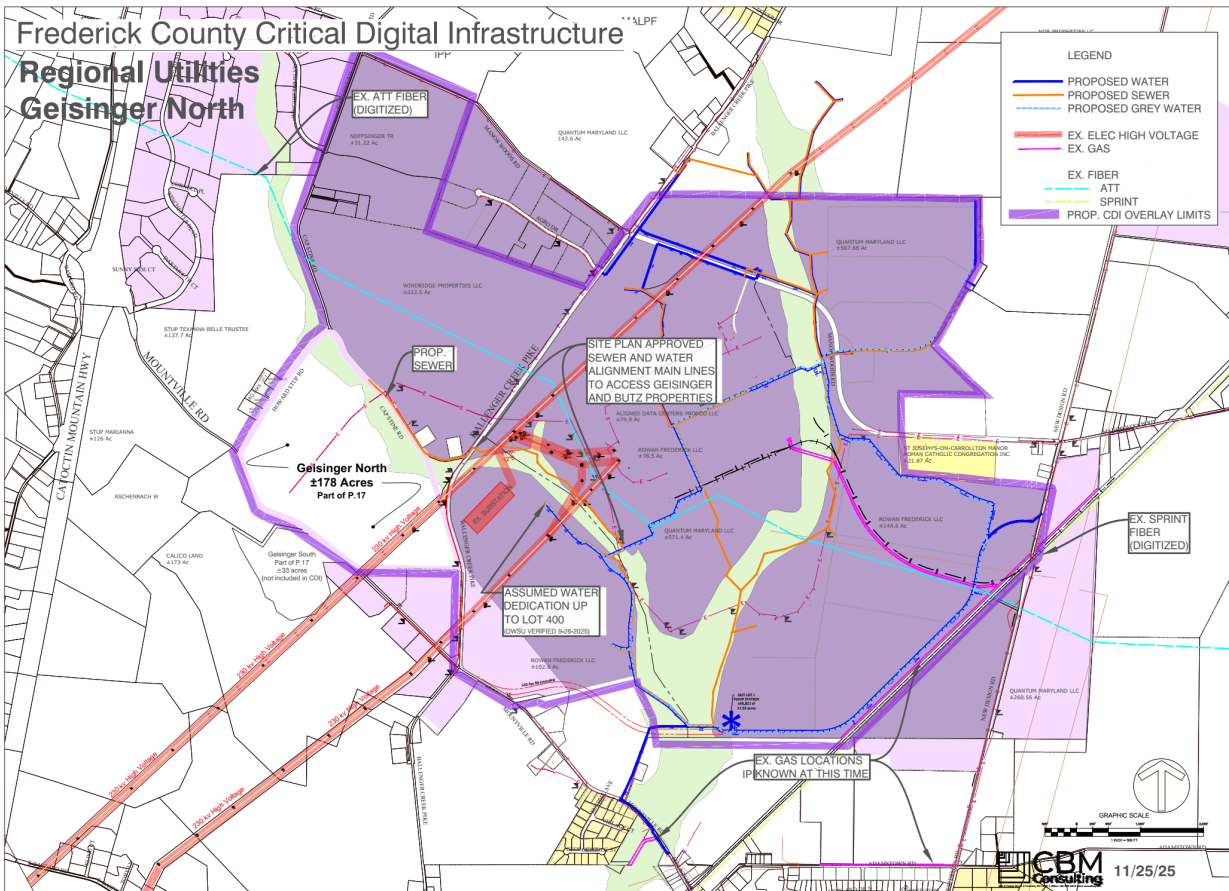
Cap Stine Rd

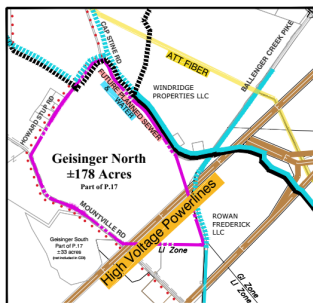
Windridge

High  
Voltage  
Tower on  
Property





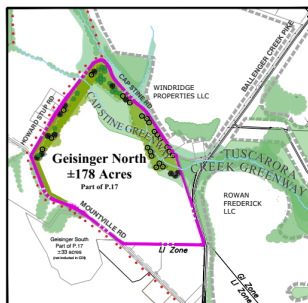




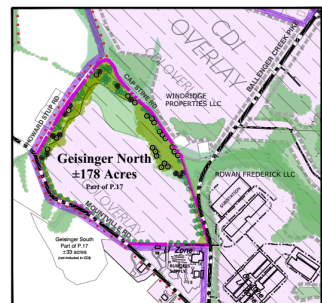
B. Adjacency to Utility Infrastructure



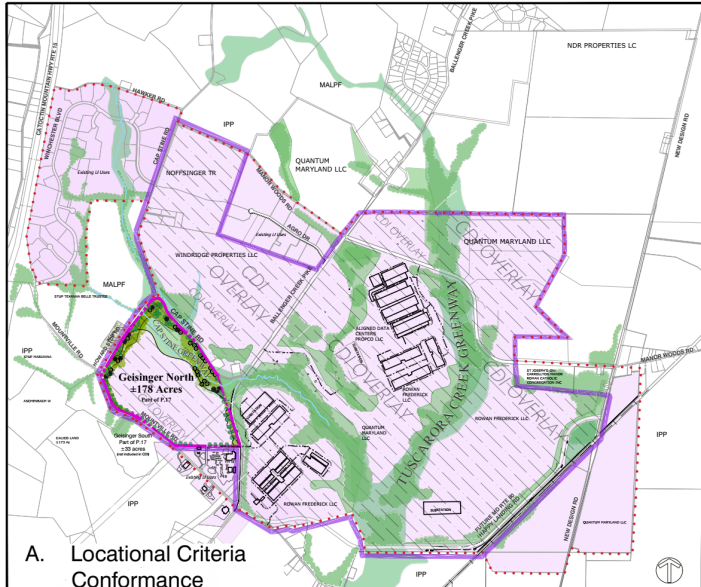
C. Regional Transportation



D. Green Infrastructure



E. Compatibility



A. Locational Criteria Conformance

## FREDERICK COUNTY CDI Overlay

### Conformance to County Guardrails:

Exhibit F

#### A. Locational Criteria

- Direct Adjacency to Existing Data Centers
- County remains under 1% cap

#### B. Adjacency to Utility Infrastructure

- High Voltage Power: On Property
- Sewer/Water: Planned Adjacent & Recorded Easements
- Telecom: AT&T Fiber within 1,000'

#### C. Regional Transportation

- Frontage on two County Arterial Master Plan Roadways

#### D. Green Infrastructure

- ± 40 acres of Tuscarora Creek tributary to be enhanced and protected

#### E. Compatibility

- Siting criteria
  - a. Separation
  - b. Buffers, Berming; Landscaping

Geisinger North

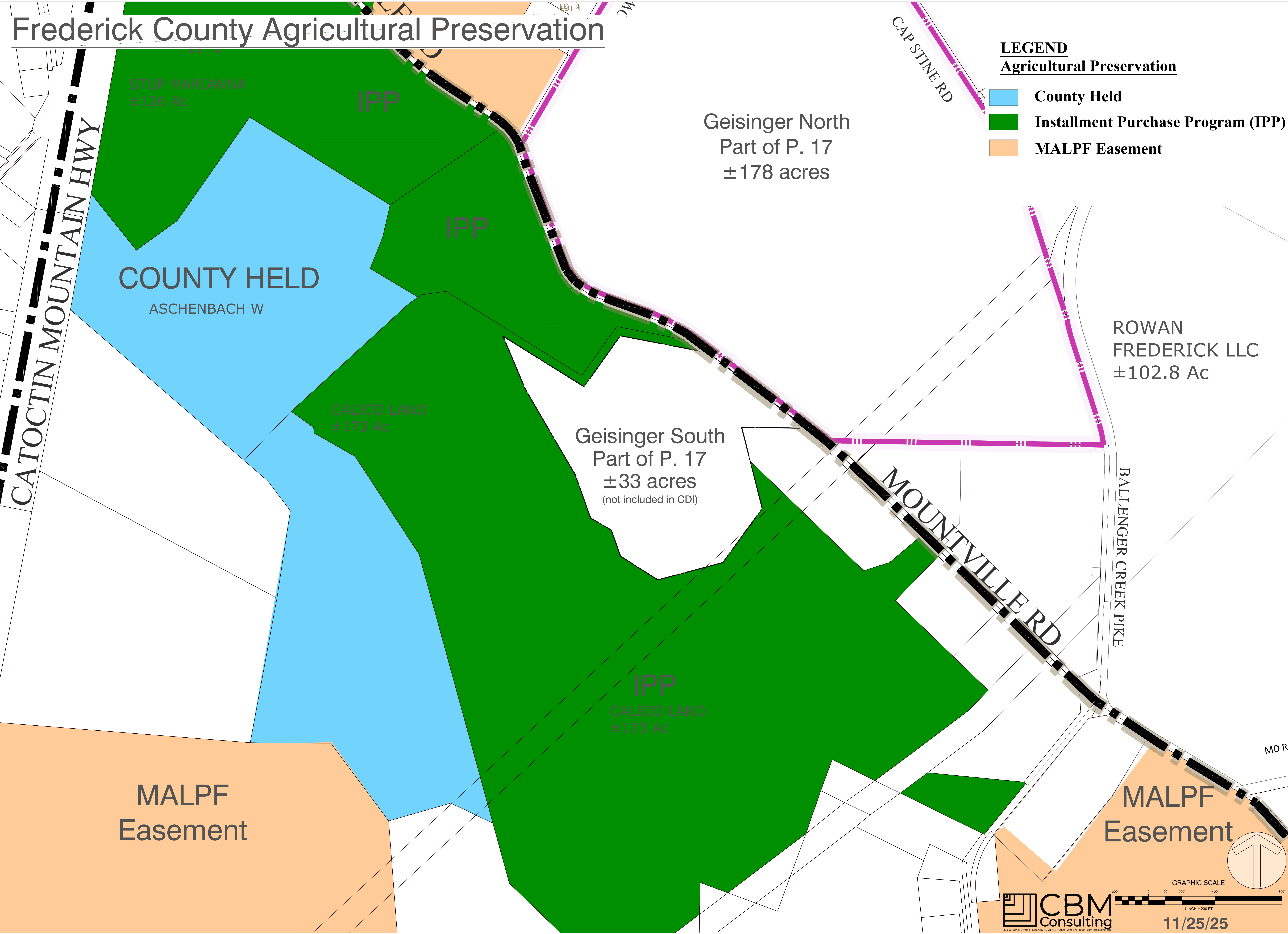








# Frederick County Agricultural Preservation



**From:** Don Pleasants <[DPleasants@pleasants.org](mailto:DPleasants@pleasants.org)>

**Sent:** Tuesday, November 25, 2025 2:46 PM

**To:** Council Members <[CouncilMembers@FrederickCountyMD.gov](mailto:CouncilMembers@FrederickCountyMD.gov)>

**Subject:** FW: Request for Inclusion of Parcel J5 and Parcel J6 in the Critical Data Infrastructure Overlay Zone

**[EXTERNAL EMAIL]**

William D Pleasants Jr  
24012 Frederick Road  
Clarksburg, MD 20871  
November 22, 2025

Delivered via email only  
Mr. Brad Young, President *and*  
Members of the Frederick County Council  
Winchester Hall  
12 E. Church Street  
Frederick, MD 21701  
[countycouncil@frederickcountymd.gov](mailto:countycouncil@frederickcountymd.gov)

Dear Council President Young and Members of the Council:

**Re: Request for Inclusion of Parcel J5 and Parcel J6 in the Critical Data Infrastructure Overlay Zone**

I am writing to respectfully request the inclusion of Parcel J5 and Parcel J6, (as shown on Map B, Property Owner Requests, attached to this email) in the Critical Data Infrastructure Overlay Zone. Including these parcels will significantly advance the goals of economic development, technology infrastructure, and sustainability, while remaining compatible with surrounding land uses.

**I further request that LI zoning be placed on parcel J5 and GI zoning be placed on parcel J6, by comprehensive rezoning action by the County Council.**

There is a substantial need for outdoor storage and parking during the construction phase for Data Center construction, which is only allowed in the GI zone and may not be allowed under the LI zoning. Currently there is not enough GI zoned land available to meet the current and future needs for storage and parking during CDI construction within reasonable proximity to the proposed CDI Overlay Zone.

I also want to express my strong support for the Council's recently adopted 500-foot buffer from residentially zoned properties. **This standard strikes a practical and effective balance between development needs and community considerations.** The buffer allows for the creation of berms and tree planting, which serve as natural visual and sound barriers, mitigating potential impacts on neighboring residential areas.

The buffer is especially pertinent to Parcel J5, which is adjacent to a residentially zoned property in the northwest corner of the site. The 500-foot setback from the property line provides ample room to completely screen the view of the maximum 75-foot height allowed for a Data Center from neighboring homes. There are no streams, wetlands, or other existing conditions that would prohibit the construction of a screening berm that will eliminate the visual and sound impact of a Data Center building. A power transmission line crosses Parcel J5 limiting the area to locate a Data Center between the power line and the proposed berm. A greater setback will substantially restrict or eliminate the ability to construct the use of approximately 100 acres of the property north of the power line for data center use. **As shown in the attached drawing,** a 500-foot buffer accommodates berms that provide **complete screening.** The recently adopted **500-foot buffer requirement strikes the right balance between environmental stewardship, community well-being, and economic viability.**

Additionally, there are further opportunities within the 500-foot buffer, such as reforestation on the outside of the berm, which enhances visual screening and provides environmental benefits. Solar installations on the interior side of the berm would not be visible from adjoining residential properties, supporting renewable energy goals without compromising aesthetics.

-Parcel J5 and Parcel J6 are uniquely positioned for inclusion in the CDI Overlay due to the following reasons:

- Frontage on New Design Road provides easy access without passing through local neighborhoods.
- No impact from Data Centers to properties on the east side of New Design Road; these properties are in active mineral mining use and are screened by extensive berms and trees.
- General Industrial zoned property abuts Parcel J6 to the south.
- Immediately adjacent to Eastalco Data Center campus
- Minimal impact on nearby residentially zoned properties.

Including Parcel J5 and Parcel J6 in the Critical Data Infrastructure Overlay Zone will:

- Honor the original intent of the County Executive and County Council.
- Provide effective screening and protect community character.
- Limit sprawl of data centers

- Enable innovative uses such as renewable energy and ecological restoration.
- Support economic growth and sustainability objectives.

**Whether or not additional Data Centers are built in Frederick County, Maryland, is up to you.** Frederick County should provide reasonable expectations to Data center developers that they can plan and build their projects on land zoned for Data Center use. Timing is critical to Data Center Operators. Frederick County should not miss out on this tremendous opportunity and benefits that Data Center growth will bring to Frederick County and its citizens. Please take this opportunity to capture the economic benefits of high-paying jobs, as well as the opportunities for local businesses providing services to the Data Center industry. Frederick County and the State of Maryland will greatly benefit from the very substantial tax revenue generated from these projects.

**I urge the Council to proceed with the inclusion of Parcel J5 and Parcel J6 in the Critical Data Infrastructure Overlay Zone, as well as classifying them industrial for their underlying zoning.**

Thank you for your consideration. I am available to answer any questions or provide additional information.

Sincerely,  
William (Don) Pleasants

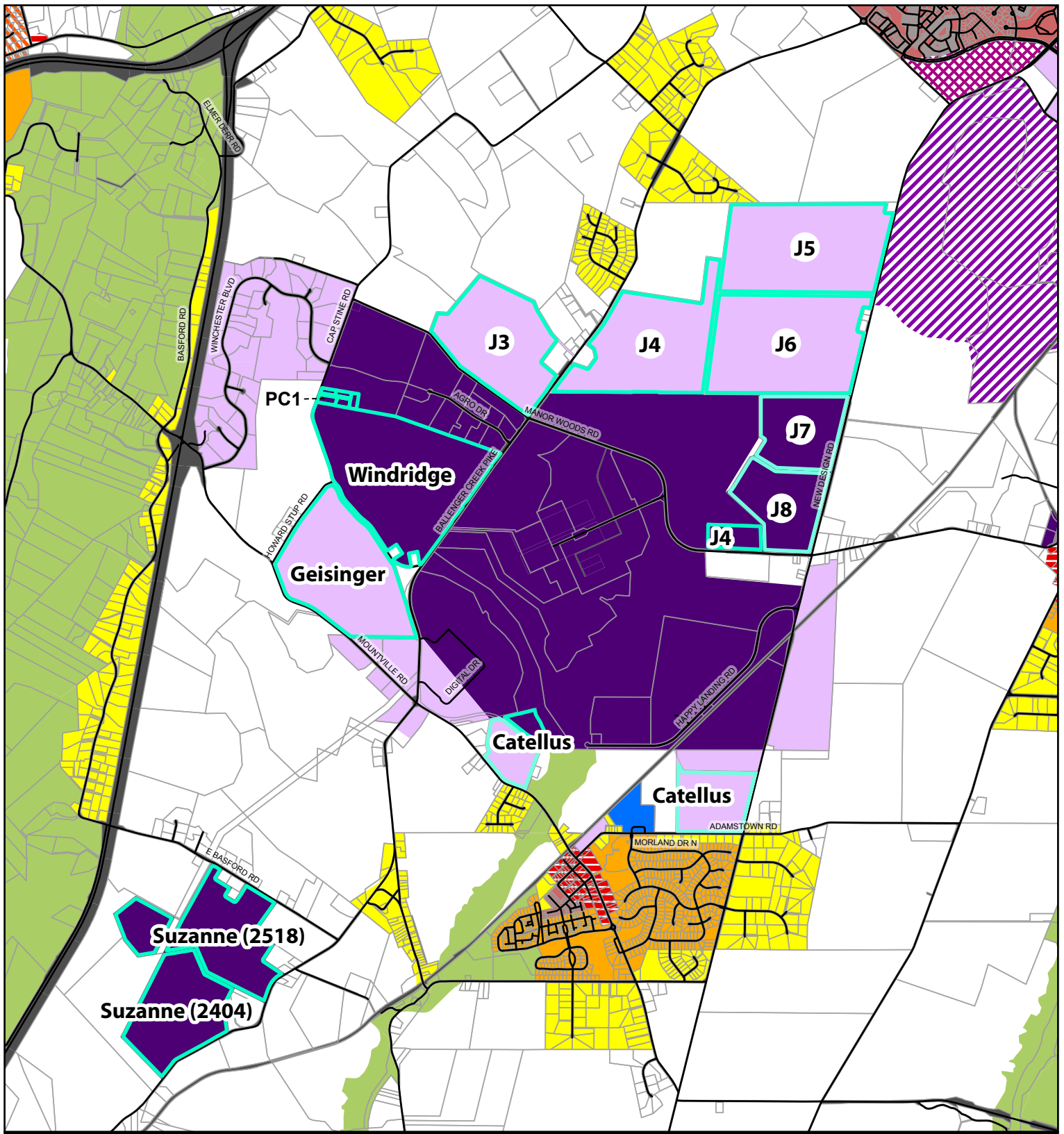
Don Pleasants  
301-428-0800 Work  
301-252-4236 Mobile  
[dpleasants@pleasants.org](mailto:dpleasants@pleasants.org)



**The Pleasants Way: Fundamental #15 – Honor Commitments.**

*Do what you say you're going to do when you say you're going to do it. This includes being on time for all phone calls, appointments, meetings, and promises. If a commitment can't be fulfilled, notify others early and agree on a new deliverable to be honored.*





# Map B- Property Owner Requests for Re-Zoning *Council Consideration*

**Requested Zoning**  

GI

LI

**Zoning**  

A – Agricultural

RC – Resource Conservation

R1 – Low Density Residential

R3 – Low Density Residential

R5 – Middle Density Residential

PUD – Planned Unit Development

VC – Village Center

GI – General Industrial

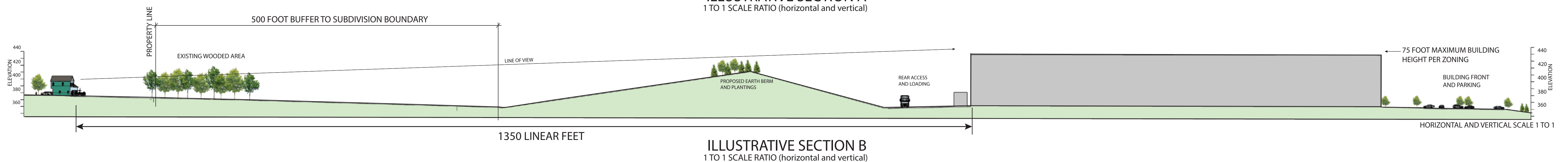
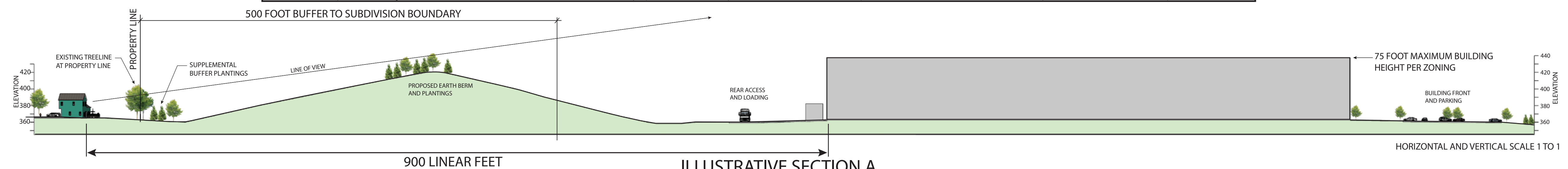
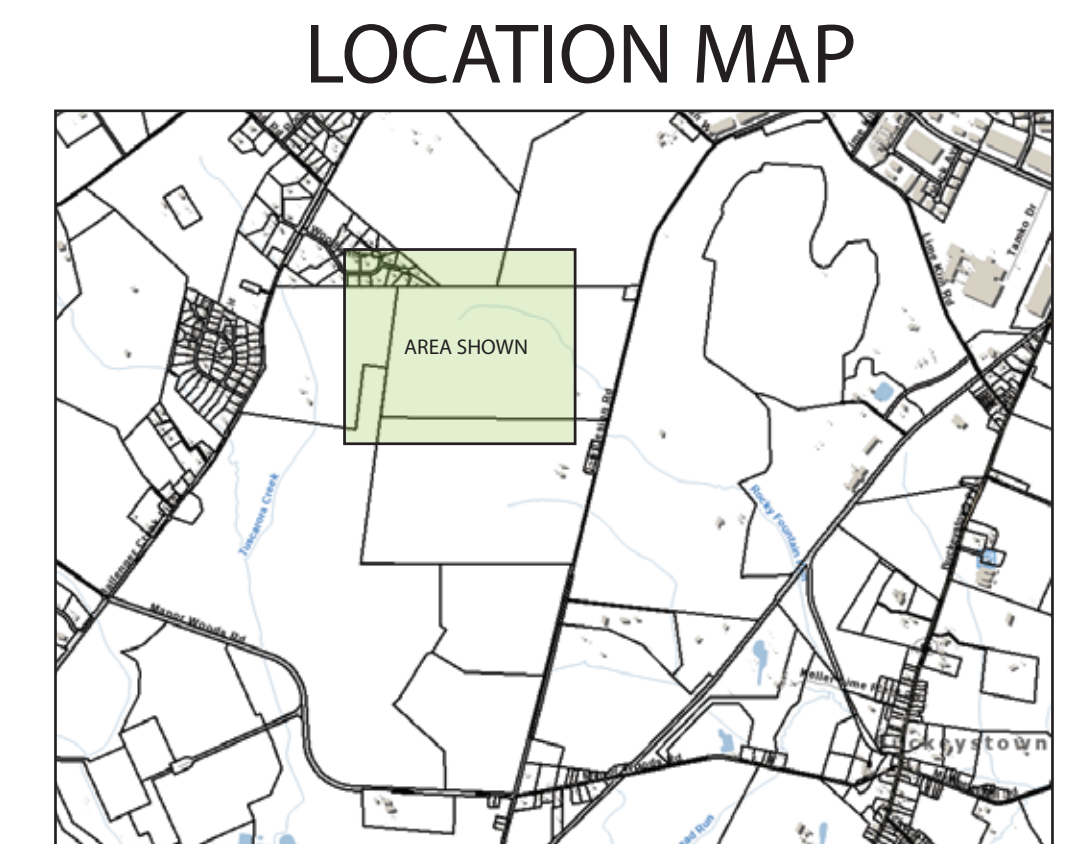
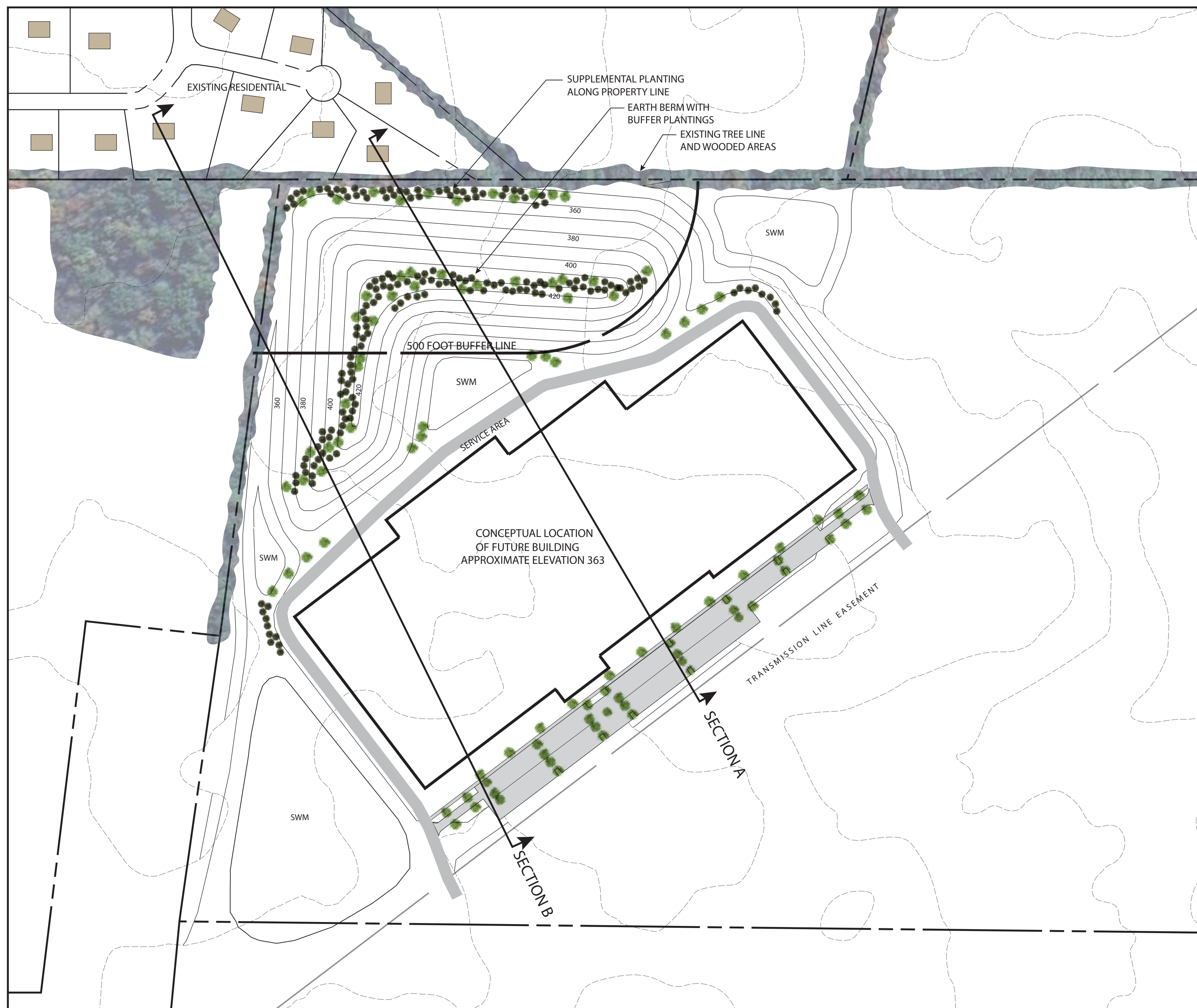
LI – Limited Industrial

MXD – Mixed Use Development

MM – Mineral Mining

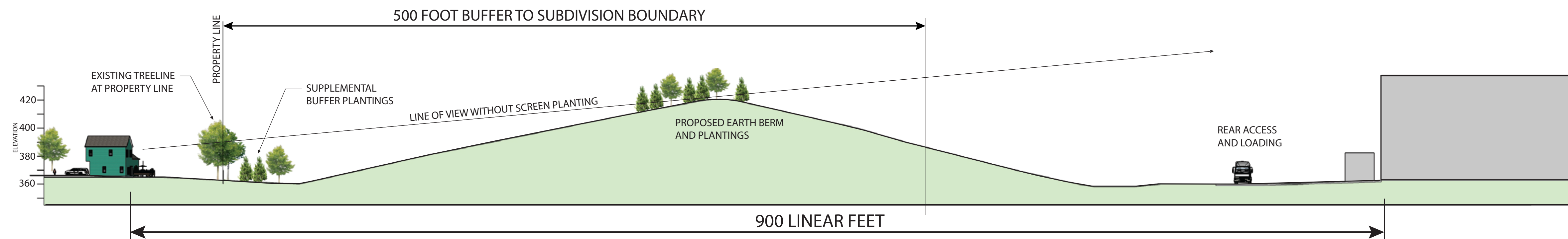
Ie - Institutional



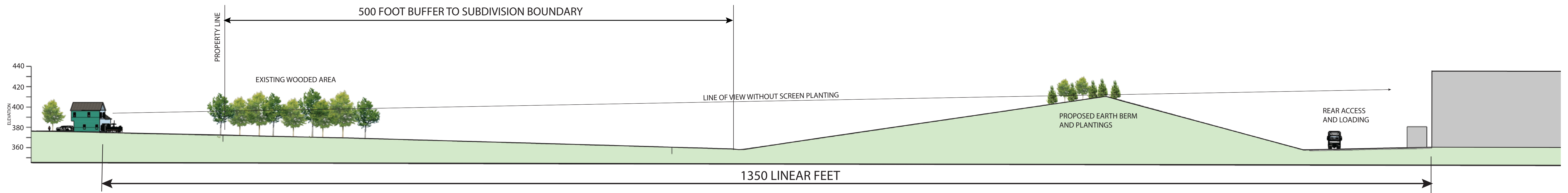


## PRELIMINARY DEVELOPMENT SCENARIO WITH ADJACENT RESIDENTIAL





ILLUSTRATIVE SECTION A  
1 TO 1 SCALE RATIO (horizontal and vertical)



ILLUSTRATIVE SECTION B  
1 TO 1 SCALE RATIO (horizontal and vertical)

## RESIDENTIAL LINE OF SIGHT

**From:** Manalo, Noel <[Noel.Manalo@offitkurman.com](mailto:Noel.Manalo@offitkurman.com)>

**Sent:** Tuesday, November 25, 2025 10:48 AM

**To:** Young, Brad <[BYoung@FrederickCountyMD.gov](mailto:BYoung@FrederickCountyMD.gov)>; Duckett, Kavonte <[KDuckett@FrederickCountyMD.gov](mailto:KDuckett@FrederickCountyMD.gov)>; Knapp, Renee <[RKnapp@FrederickCountyMD.gov](mailto:RKnapp@FrederickCountyMD.gov)>; Keegan-Ayer, MC <[MCKeegan-Ayer@FrederickCountyMD.gov](mailto:MCKeegan-Ayer@FrederickCountyMD.gov)>; Donald, Jerry <[JDonald@FrederickCountyMD.gov](mailto:JDonald@FrederickCountyMD.gov)>; McKay, Steve <[SMcKay@FrederickCountyMD.gov](mailto:SMcKay@FrederickCountyMD.gov)>; Carter, Mason <[MCarter@FrederickCountyMD.gov](mailto:MCarter@FrederickCountyMD.gov)>; Council Members <[CouncilMembers@FrederickCountyMD.gov](mailto:CouncilMembers@FrederickCountyMD.gov)>

**Cc:** Cherney, Ragen <[RCherney@FrederickCountyMD.gov](mailto:RCherney@FrederickCountyMD.gov)>; Luna, Nancy <[NLuna@FrederickCountyMD.gov](mailto:NLuna@FrederickCountyMD.gov)>; Redmond, Lee <[LRedmond@FrederickCountyMD.gov](mailto:LRedmond@FrederickCountyMD.gov)>; Grabowski, Sarah <[SGrabowski@FrederickCountyMD.gov](mailto:SGrabowski@FrederickCountyMD.gov)>; Klimko, Sydnee <[SKlimko@FrederickCountyMD.gov](mailto:SKlimko@FrederickCountyMD.gov)>; Venable, Victoria <[VVenable@FrederickCountyMD.gov](mailto:VVenable@FrederickCountyMD.gov)>; Gaines, Kimberly <[KGaines@FrederickCountyMD.gov](mailto:KGaines@FrederickCountyMD.gov)>; Wilkins, Michael <[MWilkins@FrederickCountyMD.gov](mailto:MWilkins@FrederickCountyMD.gov)>

**Subject:** RE: CDI-OZ 12/2 Briefing - Windridge Properties comprehensive rezoning request

**[EXTERNAL EMAIL]**

Dear President Young and Council Members: On behalf of Windridge Properties, L.L.C., attached please find a letter and materials, with updates from October.

Thank you for your continued attention and support, and Happy Thanksgiving. Regards,  
Noel Manalo



**Noel Manalo**

Principal  
D [240.772.5108](tel:240.772.5108)

[Noel.Manalo@offitkurman.com](mailto:Noel.Manalo@offitkurman.com)



30 West Patrick Street  
Suite 300  
Frederick, MD 21701  
T [240.772.5200](tel:240.772.5200)  
F [240.772.5135](tel:240.772.5135)  
[offitkurman.com](http://offitkurman.com)





**From:** Manalo, Noel <[Noel.Manalo@offitkurman.com](mailto:Noel.Manalo@offitkurman.com)>

**Sent:** Wednesday, October 8, 2025 7:52 AM

**To:** Young, Brad <[byoung@frederickcountymd.gov](mailto:byoung@frederickcountymd.gov)>; Duckett, Kavonte <[kduckett@frederickcountymd.gov](mailto:kduckett@frederickcountymd.gov)>; Knapp, Renee <[rknapp@frederickcountymd.gov](mailto:rknapp@frederickcountymd.gov)>; Keegan-Ayer, MC <[mckeegan-ayer@frederickcountymd.gov](mailto:mckeegan-ayer@frederickcountymd.gov)>; Donald, Jerry <[jdonald@frederickcountymd.gov](mailto:jdonald@frederickcountymd.gov)>; McKay, Steve <[smckay@frederickcountymd.gov](mailto:smckay@frederickcountymd.gov)>; Carter, Mason <[mcarter@frederickcountymd.gov](mailto:mcarter@frederickcountymd.gov)>; [councilmembers@frederickcountymd.gov](mailto:councilmembers@frederickcountymd.gov)

**Cc:** Cherney, Ragen <[rcherney@frederickcountymd.gov](mailto:rcherney@frederickcountymd.gov)>; Luna, Nancy <[nluna@frederickcountymd.gov](mailto:nluna@frederickcountymd.gov)>; Redmond, Lee <[redmond@frederickcountymd.gov](mailto:redmond@frederickcountymd.gov)>; Grabowski, Sarah <[sgrabowski@frederickcountymd.gov](mailto:sgrabowski@frederickcountymd.gov)>; [sklimko@frederickcountymd.gov](mailto:sklimko@frederickcountymd.gov)

**Subject:** FW: CDI-OZ 10/15 Public Hearing - Windridge Properties comprehensive rezoning request

Dear President Young and Council Members – on behalf of Windridge Properties, L.L.C., below and attached please find a copy of the correspondence to the Planning Commission ahead of their October 15 public hearing.

Thank you for your continued attention and support. Regards, Noel Manalo



**Noel Manalo**

Principal  
D [240.772.5108](tel:240.772.5108)

[Noel.Manalo@offitkurman.com](mailto:Noel.Manalo@offitkurman.com)



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Frederick, MD 21701  
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F [240.772.5135](tel:240.772.5135)  
[offitkurman.com](http://offitkurman.com)



**From:** Manalo, Noel

**Sent:** Wednesday, October 8, 2025 7:47 AM

**To:** 'PlanningCommission@FrederickCountyMD.gov'

<[PlanningCommission@FrederickCountyMD.gov](mailto:PlanningCommission@FrederickCountyMD.gov)>

**Cc:** James, Karen <[kjames@frederickcountymd.gov](mailto:kjames@frederickcountymd.gov)>; Gaines, Kimberly

<[kgaines@frederickcountymd.gov](mailto:kgaines@frederickcountymd.gov)>

**Subject:** CDI-OZ 10/15 Public Hearing - Windridge Properties comprehensive rezoning request

Honorable Planning Commissioners:

With regard to the CDI-OZ, which is the subject of your October 15, 2025 public hearing, on behalf of Windridge Properties, L.L.C. please see the attached letter.

If you might have Staff kindly confirm your receipt of this letter and its inclusion in the record.

Thank you for your consideration, and we look forward to your continued support. Regards,  
Noel Manalo

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**PRIVILEGED COMMUNICATION/PRIVACY NOTICE**

Information contained in this transmission is attorney-client privileged and confidential. It is solely intended for use by the individual or entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please immediately notify us by telephone and delete this communication.

Windridge Properties, L.L.C.  
P.O. Box 149  
Adamstown, Maryland 21710  
www.windridgefarm.com

November 25, 2025

County Council  
Planning Staff  
Frederick County, Maryland  
30 North Market Street  
Frederick, Maryland 21701

Re: **UPDATE** to Request for Comprehensive Plan Rezoning as Part of the CDI Overlay;  
Windridge Farm (+/- 223.524 AC; Tax ID# 01-002198)

Dear Frederick County Officials:

The Butz Family, the owners of Windridge Properties - 223.524 acres +/- on the north side of the intersection of Cap Stine Road and Ballenger Creek Pike/MD Route 351 (the “Windridge Property”) respectfully request that the Frederick County Council approve the following actions:

- 1) Remove the Rural Legacy designation currently on the Western portion of the Property
- 2) Comprehensively rezone the Property from Agricultural (A) to General Industrial (GI) as part of the Critical Data Infrastructure/Overlay Zone (“CDI-OZ”) legislative process (“this Comprehensive Rezoning Request) **The Windridge Property has already undergone the piecemeal rezoning process in 2023 when the Planning Commission recommended approval.**

Remove Rural Legacy Designation This designation was existing prior to the property being included in the Eastalco Community Growth Area in 2013 and should have been removed at that time. Frederick County Zoning staff recognized this error and requested that the Planning Commission (PC) recommend approval of removing the Rural Legacy designation during their presentation on October 15, 2025. The PC agreed with Staff and voted to recommend removal of the Rural Legacy Designation on the Windridge Property.

Comprehensively rezone the Property from Agricultural (A) to General Industrial (GI) We made this request via letter on October 10<sup>th</sup> 2025 and offer the following update:

1) The Planning Commission recommended approval of a CDI-OZ map that is confined to the limits of the Eastalco community growth area which includes the Windridge Property. Windridge is the only Agriculturally zoned parcel remaining to be rezoned in the Adamstown Region that possesses all four of the following attributes:

- Land Use designation of General Industrial
- Designation for “Planned Service” in the County Water & Sewerage Plan
- Location within the Eastalco priority Community Growth Area and the proposed CDI-OZ
- Recommendation of rezoning to General Industrial from the Planning Commission (in 2023)

2) The Frederick County Agricultural Preservation Advisory Board and the Frederick County Farm Bureau submitted written testimony to the Planning Commission recommending limiting the CDI-OZ to the Eastalco community growth area which includes the Windridge Property. **The Windridge Property is the only agriculturally zoned property whose development is not opposed by these organizations.**

3) At the Noffsinger's request, the PC added their property into the CDI-OZ. This leaves only two remaining residential properties adjacent to the Windridge Property and we secured letters of support from those property owners as part of our 2023 Piecemeal rezoning request.

It would be redundant, expensive, and unnecessary for the County and Butz family to repeat the piecemeal rezoning process. By rezoning the property now, as part of the comprehensive CDI-OZ process, the County:

- 1) Eliminates any concern over "piecemeal" rezonings and aligns the Windridge Property with the Livable Frederick Master Plan.
- 2) Preserves the County's rezoning process for CDI-OZ in the future by differentiating the Windridge Property from all other properties in the Priority Preservation Areas.
- 3) Allows the Windridge Property to participate in proper utility planning, development and allocations with the adjacent properties that are actively developing. Without rezoning, Windridge can not fully participate in this ongoing process.
- 4) Provides a meaningful source of revenues for the County.

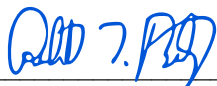
The County Council denied the 2023 Piecemeal request based on observations by some members that there was not enough evidence of "Change in the character of the neighborhood"; however significant change has occurred in the community growth area in the intervening 2+ years. This change includes the building of a major power substation and five data center buildings totaling over 1.2 million square feet, all located across the street and in line-of-sight view of the Property. The passage of time, the substantial change described above, and the passage of the CDI-OZ have made that "Change" a reality under any appropriate measurement.

My brothers and I have been farming in Frederick County for more than 40 years and currently farm over 1,000 acres here. We own multiple farms in Frederick totaling over 600 acres including the Windridge Property. As life-long farmers, we understand that the conversion of agriculturally zoned lands should be considered very carefully. The Windridge Property, however, is unique in that it has been planned for development for over 50 years. Rezoning the Windridge Property now as part of the CDI-OZ legislative process aligns with the Livable Frederick Master Plan, embodies the principles of good planning, and provides meaningful public good to the Citizens of Frederick County.

Thank you for your consideration, and we look forward to speaking with you further about this request.

Sincerely,

Windridge Properties, L.L.C.

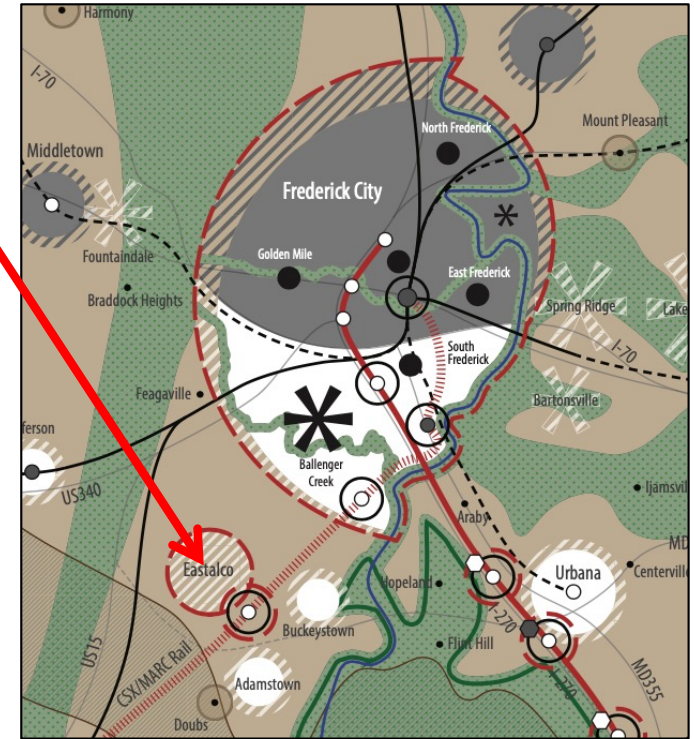
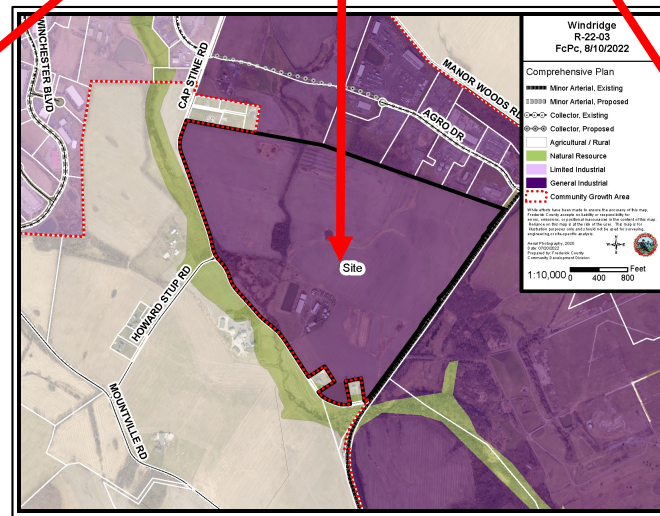
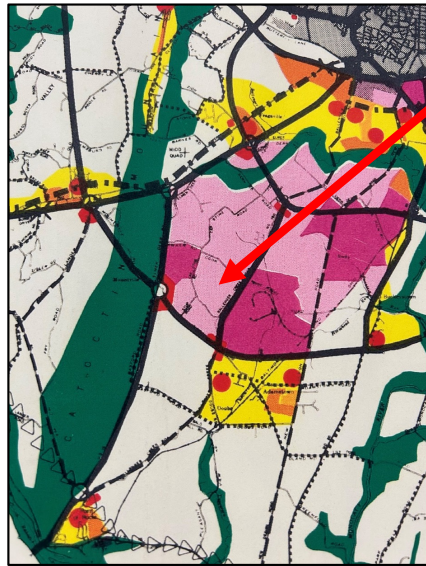


By: Robert Butz



# **Background** – The Windridge Property has been in the growth plan for over 50 years

Windridge Property



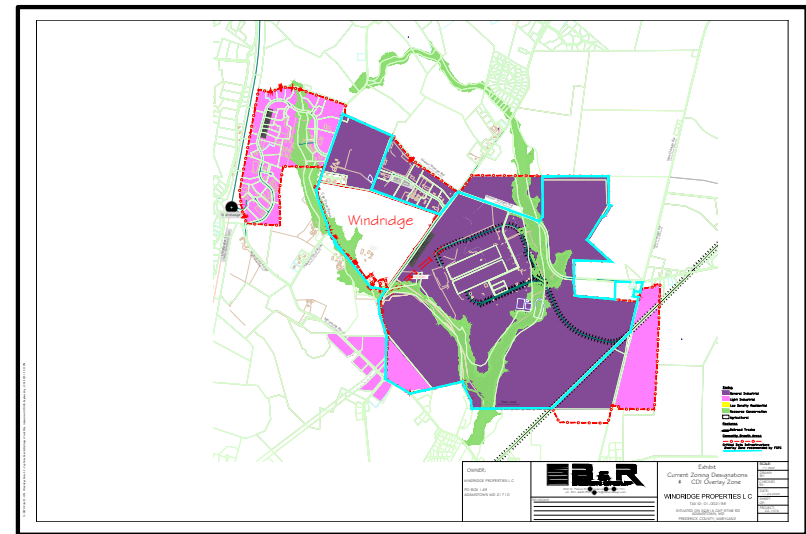
1972 Master Plan  
“Employment Reserve”  
comprehensive plan  
designation

2012 Master Plan “General  
Industrial” (GI) comprehensive  
plan designation

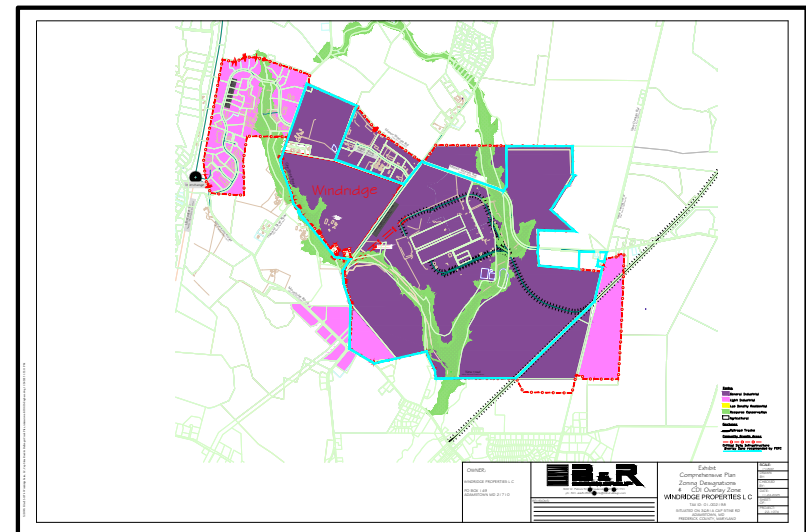
2019 Livable Frederick Master Plan  
“Eastalco Primary Growth area”  
designation

## ***Unique Situation*** – The Windridge Property has ALL the following attributes

- *Land Use designation of General Industrial*
- *“Planned Service” in the County Water & Sewerage Plan*
- *Located within the Eastalco Community Growth Area and the proposed CDI-OZ*
- **Recommendation of rezoning to General Industrial from the Planning Commission**



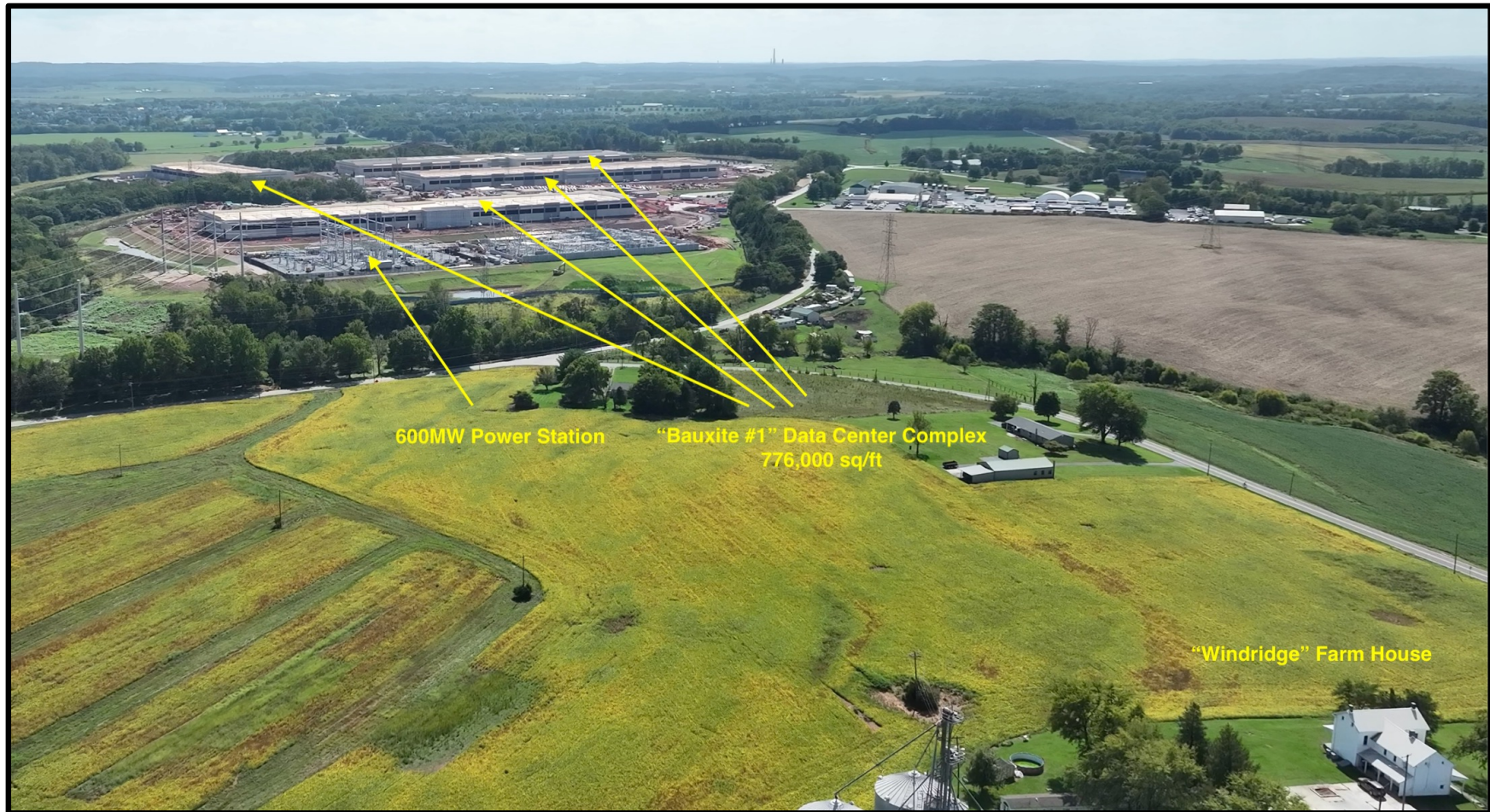
Windridge Property Current Zoning



Windridge Property Master Plan



## ***Change*** – CDI Development adjacent to the Windridge Property





*"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,

David Burrier  
President, Frederick County Farm Bureau



October 14, 2025

Re: Critical Digital Infrastructure Zoning Overlay Map

Dear County Executive Fitzwater and County Council Members,

The Frederick County Agricultural Preservation Advisory Board is providing the following advice, related to the current proposed scope of the Critical Digital Infrastructure Overlay Zone map, in accordance with our authority under Maryland Agriculture Article §2-504.1(d)(4) and Resolution 78-13 of Frederick County Government. The Board is further authorized under Maryland State Finance and Procurement Article §5-408(b) to approve the County's application for certification of its agricultural land preservation programs. Additionally, it should be noted that any change in the boundaries of the State certified Priority Preservation Area (PPA) will require *recertification* of the County's agricultural land preservation programs. Such actions could result in revocation of FCG's certification by the Maryland Department of Planning and Maryland Agricultural Land Preservation Foundation. *See Maryland State Finance and Procurement Article §5-408(i)(3).*

The Board does not support any change in land use classification from Agricultural to Limited or General Industrial. Rather **we recommend that the CDI Overlay Zone be limited to the current Limited Industrial and General Industrial zoned land and the Windridge Properties parcel, which is already inside of the Comprehensive Plan Growth Area.** Any other reclassification of agricultural land in this area will jeopardize land that has already been identified by the County as a high priority for preservation and possibly result in de-certification of the County's entire agricultural land preservation program.

Immediately outside the existing Comprehensive Plan Growth Area lies the Carrollton Manor Rural Legacy Area and Priority Preservation Area. The Rural Legacy Program's goal is to protect and preserve large, contiguous tracts of rich agricultural and forested land from sprawling development. Expansion of the existing industrial-zoned land onto these large parcels of farmland will fragment the Rural Legacy Area which has been working to protect the land, natural resources, history, and viewshed of the Adamstown area since 2003. With the exception of the Windridge Properties parcel, which is already inside of the Comprehensive Plan Growth Area, the Board does not support any reclassification of agricultural land to industrial inside the Rural Legacy Area.

Similarly, Priority Preservation Areas were selected to target land preservation efforts and build a critical mass of protected lands on the highest priority landscapes. The parcels outside of the current Community Growth Area contain some of the highest quality farm soils in the County. 642-acres of prime farm soils could be rezoned from agriculture if the current proposed CDI Overlay Map is approved.

In summary, the Agricultural Preservation Advisory Board recommends that the County vote to limit the Critical Digital Infrastructure Overlay Zone to the existing Comprehensive Plan Growth Area. Limiting the Overlay Zone to this area will ensure that our priority farmland remains available for agriculture and that Frederick County maintains its eligibility for additional revenues from State agricultural transfer taxes.

Thank you for your consideration.

Sincerely,



Sandra Tucker, Chair

Cc: Chief Administrative Officer John Peterson  
Katie Stevens, Director, Office of Agriculture  
Shannon O'Neil, Agricultural Preservation Program Administrator, Office of Agriculture  
Deborah Carpenter, Director, Division of Planning and Permitting  
Kimberly Gaines, Livable Frederick Director, Division of Planning and Permitting  
Michelle Cable, Executive Director, Maryland Agricultural Land Preservation Foundation  
Deborah Herr Cornwell, Manager, Natural Resources and Working Lands Unit, Maryland Department of Planning

3-24-2023

Mr. Gary Biser  
3663-A Cap Stine Rd  
Frederick MD 21703

**RE: Letter of support for rezoning case# R-22-03**

To whom it may concern

Please accept this letter of support in favor of rezoning case# R-22-03 covering the property located at 3681 Cap Stine Rd, Frederick MD 21703. I am the property owner and reside at 3663A Cap Stine Rd and my property directly adjoins 3681 Cap Stine on the south side. As such I am potentially one of the most directly impacted landowners of this rezoning case and I support the applicant's request to have the property rezoned to General Industrial. I understand that one of the potential uses allowed under the General Industrial zone is the construction of large data center buildings.

Sincerely,

Gary Biser



3-24-2023

~~Ms. Paula Biser~~

3651 Cap Stine Rd  
Frederick MD 21703

*Paula B. Toney*

**RE: Letter of support for rezoning case# R-22-03**

To whom it may concern

Please accept this letter of support in favor of rezoning case# R-22-03 covering the property located at 3681 Cap Stine Rd, Frederick MD 21703. I am the property owner and reside at 3651 Cap Stine Rd and my property directly adjoins 3681 Cap Stine on the south side. As such I am potentially one of the most directly impacted landowners of this rezoning case and I support the applicant's request to have the property rezoned to General Industrial. I understand that one of the potential uses allowed under the General Industrial zone is the construction of large data center buildings.

Sincerely,

~~Paula Biser~~

*Paula B. Toney*



Windridge Properties, L.L.C.  
P.O. Box 149  
Adamstown, Maryland 21710  
www.windridgefarm.com

October 8, 2025

County Council  
Planning Commission  
Planning Staff  
Frederick County, Maryland  
30 North Market Street  
Frederick, Maryland 21701

Re: Request for Comprehensive Plan Rezoning as Part of the CDI Overlay;  
Windridge Farm (+/- 223.524 AC; Tax ID# 01-002198)

Dear Frederick County Officials:

The Butz Family, the owners of Windridge Properties - 223.524 acres +/- on the north side of the intersection of Cap Stine Road and Ballenger Creek Pike/MD Route 351 (the “Windridge Property”), respectfully request that the Planning Commission recommend, and the County Council approve, comprehensive rezoning of the Property from Agricultural (A) to General Industrial (GI) as part of the Critical Data Infrastructure/Overlay Zone (“CDI-OZ”) legislative process (“this Comprehensive Rezoning Request”), as was intended by the Master Plan in 2011 and reaffirmed by Livable Frederick in 2019.

With the creation of the CDI-OZ, Windridge is the **only parcel** remaining to be rezoned in the Adamstown Region that possesses all three of the following attributes:

- Land Use designation of General Industrial
- Designation for “Planned Service” in the County Water & Sewerage Plan
- Location within the Eastalco priority Community Growth Area and the proposed CDI-OZ.

By rezoning the property now, as part of the comprehensive CDI-OZ process, the County:

- 1) Eliminates any concern over “piecemeal” rezonings and aligns the Windridge Property with the Livable Frederick Master Plan.
- 2) Preserves the County's rezoning process for CDI-OZ in the future by differentiating the Windridge Property from all other properties in the Priority Preservation Areas.
- 3) Allows the Windridge Property to participate in proper utility planning, development and allocations with the adjacent properties that are actively developing. Without rezoning, Windridge can not fully participate in this process.

Additionally, the Windridge Property has already undergone its own piecemeal rezoning process in 2023. It would be redundant, expensive, and unnecessary for the County and Butz family to repeat the process.

General Industrial zoning on this property will result in an order of magnitude increase in tax revenue collected by the County as evidenced by property assessments already occurring on the Eastalco property. Eventual CDI development will provide additional revenue while supporting jobs and other economic activity in the County. As life-long farmers who have farmed this property for over 30 years we understand that the conversion of agriculturally zoned lands should be considered very carefully. The Windridge Property, however, is unique in that it has been planned for development for over 40 years.

In 2023, we requested a piecemeal rezoning of the Windridge Property based on substantial change in the character of the neighborhood resulting from legislative, infrastructure, construction, and other unanticipated changes associated with the Quantum Frederick data center project on the former Eastalco property (the “2023 Piecemeal Request”). **The Planning Commission recommended approval** of the 2023 Piecemeal Request. Planning commissioner Rensberger, in his agreement with rezoning, stated *“The parcel is located inside the Eastalco community growth area, its planned use is industrial.... if you believe in simple concise borders and sensible clean lines that make sense. That parcel represents a missing tooth in that General Industrial area. That’s the best little parallelogram to attach to the General Industrial than any other”*. (Feb. 8, 2023 3:06:52)

However, the County Council denied the 2023 Piecemeal request based on observations by some members that there was not enough evidence of “change”. County Planner Denis Superczynski observed: *“If we were to get into our time machines and come back 3 or 5 years from now, we would see things rising out of the ground, we would be able to positively identify them as part of a data center campus & that you would be able to demonstrate the physical change, the substantial change to the neighborhood.”*. (Apr. 18, 2023 – 1:59:27)

Council President Young stated *“I have to agree that under the uses that are around it and what’s around the other side of it, [it] hasn’t changed that in my opinion warrants the change at this point. Now, I will say that I do believe at some point it will. I think that’s down the road. I just don’t think it’s at this time . . . I just think it’s premature”*. (May 2, 2023 – 44:12)

Significant construction has occurred on the Quantum Frederick data center campus in the intervening 2+ years since the Piecemeal request. This construction has further bolstered the justification for finding that a substantial change has occurred in the neighborhood since the Comprehensive Plan Map was adopted on September 13, 2012, and re-adopted as part of the Livable Frederick Master Plan on September 3, 2019. The attached image demonstrates this change including the building of a major power substation and five data center buildings totaling over 1.2 million square feet, all located across the street and in line-of-sight view of the Property.

Comprehensive Rezoning is the opportunity to plan and legislate based on intentional planning goals as set forth in the Livable Frederick Master Plan. As part of the 2023 Piecemeal Application, the Staff Report made favorable planning observations on all material aspects, only questioning the “change” aspect. It was only on the question of “change” and the timing of that “change”, that the Council did not concur with the Planning Commission’s recommendation. The passage of time, the substantial construction described above, and the passage of the CDI-OZ have made that “change” a reality under any appropriate measurement.

With the adoption of the CDI-OZ, it is clear the County wants to center CDI development and Industrial-zoned property at, and proximate to, the former Eastalco area. The County has thoroughly discussed all of the planning justifications for this intent, from both the County-wide and the Adamstown-specific perspectives. This Comprehensive Rezoning Request is squarely aligned with all of those justifications.

Rezoning the Windridge Property now as part of the CDI-OZ legislative process aligns with the Livable Frederick Master Plan, embodies the principles of good planning, and provides meaningful public good to the Citizens of Frederick County. Commissioner Rensberger effectively summarized the case for granting rezoning of the Property when he said *“I think we might as well roll it (the Property) in now so we can include this owner and this parcel in our ongoing yet to be completed small area plan for Eastalco. I don’t see the benefit in waiting”* (Feb 8, 2023 3:08.02).

Thank you for your consideration, and we look forward to speaking with you further about this request.

Sincerely,

Windridge Properties, L.L.C.

By:   
Robert T. Butz

From: Robert Stevens <pbookbob@icloud.com>  
Sent: Tuesday, November 25, 2025 9:51 PM  
To: County Executive <CountyExecutive@FrederickCountyMD.gov>  
Subject: Adamstown Data Centers

[EXTERNAL EMAIL]

Ms Fitzwater,

Before the County makes a determination of the outcome concerning data centers and further rezoning of southwest Frederick County please take another drive around this area. We would hope that they will protect and keep open space and agriculture land close to the villages of Adamstown and Buckeystown and Point of Rocks. Perhaps any increased industrial rezoning expansion could be offset by rezoning and making agricultural areas such as those close to schools, churches and housing? A trade.? The areas North of Ballenger Creek Rd between Cap Stein and Manor Woods Rd up to Route 15 already have Industry. There is plenty of open space close and just south 15. If the county is wanting a limit of 1% for such projects perhaps it should not all be in the same area?

Please forward to the appropriate site so it can be given consideration at the next rezoning meeting.

Thank you,  
Robert and Alma Stevens  
Adamstown

**From:** sandy doggett <sdoggett@gmail.com>

**Sent:** Monday, December 1, 2025 9:36 AM

**To:** Council Members <CouncilMembers@FrederickCountyMD.gov>

**Subject:** Stop Data Centers

**[EXTERNAL EMAIL]**

Dear Council Members,

Please limit the number of acres allotted to data centers.

Please don't add any more acres reserved for the data centers.

I agree with Jerry Donald, let's see how the current allocation affects our region before we commit to more.

I am concerned about electricity and water usage in our county. Our electric bills have already skyrocketed.

Please do not increase the acreage beyond what has already been approved.

Sincerely,

Sandra L. Doggett

Voter in Frederick County, MD

--

Sandra L. Doggett

3752 Bittle Rd, Myersville, MD 21773

301-293-2914

[sdoggett@gmail.com](mailto:sdoggett@gmail.com)



**From:** K and E Stephens <kandestephens@gmail.com>

**Sent:** Friday, November 28, 2025 10:05 PM

**To:** McKay, Steve <SMcKay@FrederickCountyMD.gov>; Donald, Jerry <JDonald@FrederickCountyMD.gov>; Council Members <CouncilMembers@FrederickCountyMD.gov>; Young, Brad <BYoung@FrederickCountyMD.gov>; Knapp, Renee <RKnapp@FrederickCountyMD.gov>; Keegan-Ayer, MC <MCKeegan-Ayer@FrederickCountyMD.gov>; Duckett, Kavonte <KDuckett@FrederickCountyMD.gov>; Carter, Mason <MCarter@FrederickCountyMD.gov>

**Cc:** County Executive <CountyExecutive@FrederickCountyMD.gov>

**Subject:** VOTE NO on CDI Overlay Expansion in Adamstown – Protect Our Residents

**[EXTERNAL EMAIL]**

**Dear County Council Members,**

I am writing as a concerned resident of Adamstown to strongly oppose any expansion of the Critical Digital Infrastructure (CDI) Overlay Zone. The current proposals do not go far enough to protect the health, safety, and rural character of our community.

Expanding this overlay is a direct threat to our residents for the following urgent reasons:

**1. 500-Foot Setbacks Are Insufficient for Vulnerable Residents** The proposed 500-foot setback from residential zones is dangerously inadequate. This is not just about the schools; it is about the many homes located just hundreds of feet from these industrial sites. Adamstown is home to many elderly residents and young children who are the most susceptible to respiratory issues caused by construction dust and diesel fumes from backup generators. A 500-foot buffer does not stop noise pollution, low-frequency hums, or air contaminants.

**2. Mandatory Safety Alarms for Nearby Homes** If these facilities are built near our homes, the Council must mandate that **audible emergency alarms** are installed on all Data Center buildings—not just the primary ones. Residents within the blast or hazard radius of industrial battery storage and cooling chemical tanks have a right to be instantly alerted in the event of a fire or toxic leak. Excluding any buildings from this safety requirement puts the elderly and families in immediate surrounding houses at risk.

**3. Incompatible with Our Rural Infrastructure** Adamstown's infrastructure cannot support this level of industrialization.

- **Water:** Our aquifer and the Monocacy River cannot sustain the millions of gallons of water required daily for cooling without risking residential well safety.

- **Grid Instability:** The PJM grid is already strained. Expanding the overlay invites further instability and transmission line sprawl (like the MPRP) that destroys our property values and landscape.

**4. Quality of Life Destruction** Expanding the CDI Overlay into agricultural land (such as the parcels rejected by the Planning Commission) would fundamentally destroy the rural nature of South Frederick County. We are not an industrial park; we are a community of families, farms, and quiet residences.

I urge you to accept the Planning Commission's recommendation to **limit** the map strictly to the existing Eastalco footprint—or reject the overlay entirely—and to implement stricter safety mandates for any approved facilities.

Pause you have not seen the full effects of the current 1600 acres. We are only on the second Draft Permit Meeting coming up December 8th for 99 Diesel Generators. The one that was approved last year of the Aligned Data Center of 168 Diesel Generators was because Adamstown, MD you know had a lack of transparency. Until my neighbor made me aware of what was going on my entire neighborhood of Green Hill Manor is in an uproar. We have now gotten Adamstown Commons involved as well. We are already seeing our Property Values Plummeting and it is only going to get worse because of your sacrifice of Adamstown and South Frederick MD.

The Data Center Debacle will be an electoral issue that if you vote against the Citizens of Adamstown and South Frederick it will follow you. We will do a lawsuit if this passes when we made the entire County Council aware and you ignored us anyway.

Furthermore, it is gross negligence for the County Council and Executive to fail to ensure Carroll Manor Elementary—a school built in 1965—is protected from the exhaust plumes of these diesel generators. How can you allow this industrial machinery to operate without first verifying if the school's aging infrastructure can even handle the emissions? I recently spoke with my daughter's teacher, who confirmed that the staff was kept completely in the dark; if it weren't for a vigilant neighbor, they would have known nothing. We are exhausted by the lack of transparency this administration has put us through for years. To make matters worse, the 5:1 decision favoring Thurmont is a direct slap in the face to our community."

Respectfully,

E Stephens

Adamstown MD

**From:** Kenneth Stephens <stephenskenneth1004@gmail.com>

**Sent:** Friday, November 28, 2025 10:18 PM

**To:** McKay, Steve <SMcKay@FrederickCountyMD.gov>; Donald, Jerry

<JDonald@FrederickCountyMD.gov>; Council Members

<CouncilMembers@FrederickCountyMD.gov>; Young, Brad

<BYoung@FrederickCountyMD.gov>; Knapp, Renee <RKnapp@FrederickCountyMD.gov>;

Keegan-Ayer, MC <MCKeegan-Ayer@FrederickCountyMD.gov>; Duckett, Kavonte

<KDuckett@FrederickCountyMD.gov>; Carter, Mason <MCarter@FrederickCountyMD.gov>

**Cc:** County Executive <CountyExecutive@FrederickCountyMD.gov>

**Subject:** PROTECT OUR CHILDREN: Vote NO on CDI Overlay Expansion / Safety Mandates for Adamstown

**[EXTERNAL EMAIL]**

**Dear County Council Members,**

I am writing to you as a terrified parent and resident of Adamstown to demand that you **REJECT** the expansion of the Critical Digital Infrastructure (CDI) Overlay Zone.

It is an act of negligence to consider placing industrial data centers with massive diesel backup generators just feet from **Carroll Manor Elementary School**. You are asking us to trust a plan that leaves our most vulnerable residents—our children—completely unprotected.

**1. The School is Not Built for This Risk** Carroll Manor Elementary was built in **1965**. It is an aging facility that likely lacks the advanced HEPA filtration and positive-pressure ventilation systems required to block the toxic particulate matter (PM2.5) and nitrogen oxides emitted by industrial diesel generators. When those generators fire up—whether for testing or an emergency—our children will be breathing that exhaust on the playground and in their classrooms. You have not even provided the school with a schedule of "permitted run hours" for these generators, leaving the administration and parents completely in the dark.

**2. Where are the Alarms?** If a lithium-ion battery enters "thermal runaway" or a chemical cooling tank leaks, seconds matter. Yet, there is **zero requirement** for audible community alarms on these data center buildings.

- How will the principal know to pull the kids off the playground?
- How will the elderly residents in the homes just 500 feet away know to evacuate?
- We rely on the volunteer heroes at the **Carroll Manor Fire Company**, but are they equipped and trained to fight a massive chemical battery fire?

**3. Infrastructure Disaster Waiting to Happen** Our small county roads, like Adamstown Road and Manor Woods Road, are already narrow and easily congested. In the event of a toxic plume or fire requiring evacuation, these roads will become parking lots, trapping residents and school buses while emergency vehicles try to get through.

**4. The Fire Risk is Real and Documented** You cannot claim these facilities are perfectly safe when the industry's own track record proves otherwise. Just look at the confirmed major data center fires from the last five years alone:

- **May 22, 2025 – Hillsboro, OR (Digital Realty/X):** A lithium-ion battery fire in a single power cabinet caused a global service outage.
- **October 2, 2023 – Secaucus, NJ (Evocative):** An electrical failure in the battery room forced a complete building power shutdown by the Fire Marshal.
- **August 8, 2022 – Council Bluffs, IA (Google):** An electrical arc flash explosion critically injured three electricians.
- **April 5, 2021 – Ogden, UT (WebNX):** A backup generator caught fire after a mechanical failure, requiring the fire department to cut power to the whole building.

**Lithium-ion batteries are a primary culprit.** We know that "thermal runaway" can cause one battery to ignite its neighbors, creating a fire that is incredibly difficult to extinguish. Placing this technology next to a 1965 elementary school is reckless.

**I urge you to VOTE NO on the overlay expansion.** If you force this upon us, you must mandate audible alarms, strictly limit generator hours to when school is closed, and ensure our fire department is fully upgraded *before* a single server is turned on.

Respectfully,

K Stephens

Adamstown MD

**From:** Kyle Wilson <kylewilson2799@gmail.com>

**Sent:** Friday, November 28, 2025 10:26 PM

**To:** Young, Brad <BYoung@FrederickCountyMD.gov>; Duckett, Kavonte <KDuckett@FrederickCountyMD.gov>; Knapp, Renee <RKnapp@FrederickCountyMD.gov>; Keegan-Ayer, MC <MCKeegan-Ayer@FrederickCountyMD.gov>; Carter, Mason <MCarter@FrederickCountyMD.gov>; County Executive <CountyExecutive@FrederickCountyMD.gov>; Council Members <CouncilMembers@FrederickCountyMD.gov>

**Cc:** McKay, Steve <SMcKay@FrederickCountyMD.gov>; Donald, Jerry <JDonald@FrederickCountyMD.gov>

**Subject:** You have sold out Adamstown: Immediate Protections Needed for Our Children

**[EXTERNAL EMAIL]**

**Dear County Executive Fitzwater and Council Members Young, Duckett, Knapp, Keegan-Ayer, and Carter,**

I am writing to express my absolute disgust with the decision to sacrifice Adamstown to the data center industry. By voting **YES** on the Critical Digital Infrastructure (CDI) Overlay and pushing this agenda, you have chosen corporate tax revenue over the health and safety of your own constituents.

**You are directly responsible for the following hazards now facing our community:**

1. **Endangering Carroll Manor Elementary:** You are allowing industrial diesel generators to operate within breathing distance of a school built in 1965. This building cannot filter out the toxic particulate matter these plants will emit. You have failed to mandate run-hour limits or alarms, leaving our children defenseless against potential chemical fires or "thermal runaway" events.
2. **The Insult of the 5:1 Ratio:** The provision to preserve 5 acres of farmland for every 1 acre developed is a slap in the face to Adamstown. We know this money will likely go to preserving land in Northern Frederick County (like Thurmont), while **we** in the South are left to live in an industrial sacrifice zone. You are destroying our quality of life to pay for preservation elsewhere.
3. **Ignoring the "500 Feet" Reality:** You claim a 500-foot setback is sufficient, but this ignores the reality of noise pollution and chemical drift. For the elderly residents and families living just across the property line, this is not a buffer—it is a sentence to live in a hazard zone.

**Councilman McKay and Donald voted NO because they care and listened to us.** The five of you voted YES, and now you own the consequences.

We demand that you fix this mistake before the final map is adopted. We demand **audible alarms** for all surrounding homes, strict limits on generator testing during school hours, and a guarantee that Adamstown will not become the dumping ground for the entire region's power grid infrastructure.

Do not let the legacy of your term be the destruction of South Frederick County.

Sincerely,

K Wilson

Adamstown, MD



**From:** Adamstown Resident <residentadamstown@gmail.com>

**Sent:** Friday, November 28, 2025 11:03 PM

**To:** Council Members <CouncilMembers@FrederickCountyMD.gov>; Young, Brad <BYoung@FrederickCountyMD.gov>; Knapp, Renee <RKnapp@FrederickCountyMD.gov>; Keegan-Ayer, MC <MCKeegan-Ayer@FrederickCountyMD.gov>

**Cc:** County Executive <CountyExecutive@FrederickCountyMD.gov>

**Subject:** VOTE NO: We have not forgotten "Project Holiday" and your broken promises on transparency

**Dear County Council Members,**

I am writing to demand you vote **NO** on the Critical Digital Infrastructure (CDI) Overlay expansion. But more importantly, I am writing to put you on notice: The people of Adamstown know exactly what you are doing, because we have seen this playbook before.

We have not forgotten **"Project Holiday."**

For years, officials in this county worked in secret—hiding behind code names and Non-Disclosure Agreements (NDAs)—to negotiate massive data center deals like the Amazon (AWS) project. You treated our community not as partners, but as obstacles to be managed. You signed secret deals to industrialize our homes while we were kept completely in the dark.

Now, you are doing it again:

**1. The "Holiday" Timing is Deliberate**

It is no coincidence that "Project Holiday" was the code name then, and now you are forcing through this massive CDI Overlay expansion in mid-December. You are holding critical public hearings on December 16th—just days before Christmas—knowing full well that families are busy, schools are closing, and residents are distracted. You are banking on our exhaustion. It is a cowardly tactic to avoid facing the people you are supposed to represent.

**2. The NDA Culture Continues**

You talk about "transparency," yet you continue to withhold documents and refuse to answer basic safety questions about the 1965 Carroll Manor Elementary School. Who is protecting the children? The secrecy regarding the blast radius of these batteries and the toxicity of the diesel plumes suggests you are still protecting corporate interests over public safety.

**3. We Know Who Was Involved**

We know that senior economic development officials and county leaders were aware of these massive industrial plans long before the public was told. The "compromise" you are offering now—the insufficient 500-foot setbacks and the "5-to-1" preservation ratio that sends money to Thurmont while destroying Adamstown—is just another backroom deal.

Stop hiding behind holidays. Stop hiding behind NDAs.

If you have any integrity, you will **vote NO** on this expansion, delay any decision until after the New Year when the public can fully participate, and finally release *all* safety data regarding the risks to our schools.

Do not let "Project Holiday" become the permanent legacy of this Council.

Sincerely,

K Hansen

Adamstown, MD

From: Guy Philemon III <user@votervoice.net>

Sent: Saturday, November 29, 2025 10:14 AM

To: Council Members <CouncilMembers@FrederickCountyMD.gov>

Subject: Vote to Expand the CDI Overlay: Protect 99% of the County While Growing Jobs & School Funding

[EXTERNAL EMAIL]

Dear Councilmember Councilmember,

As a Frederick County resident, I urge you to Expand the Critical Digital Infrastructure Overlay and Rezone the same area Industrial to maximize data center jobs and school funding.

An Expanded Overlay Rezoned Industrial is a win for Frederick County because:

- It limits data centers to less than 1% of the county's land and preserves 5 acres of farmland for every one acre of data center growth • It will support Frederick jobs for Frederick residents during construction and operation of the Quantum Frederick campus, so more county residents can work closer to home instead of driving to Virginia
- It will provide an estimated \$215 million in annual tax revenue to help fund new schools and exceptional teachers for decades to come.
- It allows the county to comprehensively and thoughtfully plan for data centers now – rather than piecemeal in the future.

Please vote to Expand the CDI Overlay and Rezone Industrial. Doing so will maximize economic benefits from data center development while putting 99% of Frederick County off limits to data center growth.

Sincerely,

Guy Philemon III  
1823 Dulaney Ct  
Frederick, MD 21702  
Guyphilemon44@gmail.com

From: Beth Molesworth <memolesworth@gmail.com>  
Sent: Saturday, November 29, 2025 10:27 AM  
To: Council Members <CouncilMembers@FrederickCountyMD.gov>  
Subject: CDI Overlay zone

[EXTERNAL EMAIL]

To all:

In support of Mobilize Frederick's position, I support limiting the CDI Overlay zone to the existing Quantum Frederick Campus.

Beth Molesworth  
116 Kline Blvd  
Frederick, MD 21701

**From:** Mary Farrell <marymargaretfarrell@gmail.com>  
**Sent:** Monday, December 1, 2025 6:57 AM  
**To:** Council Members <CouncilMembers@FrederickCountyMD.gov>  
**Subject:** Halt

**[EXTERNAL EMAIL]**

Please halt expansion of data centers in our county.  
We support our beautiful and useful farms and need to see them remain in tact.

Thank you,  
Mary Farrell  
Resident of Frederick Cty for over 40 years  
"Don't be distracted by emotions like anger, envy, resentment. These just zap energy and waste time." RBG

From: Roy Henise <user@votervoice.net>

Sent: Saturday, November 29, 2025 10:31 AM

To: Council Members <CouncilMembers@FrederickCountyMD.gov>

Subject: Vote to Expand the CDI Overlay: Protect 99% of the County While Growing Jobs & School Funding

[EXTERNAL EMAIL]

Dear Councilmember Councilmember,

As a Frederick County resident, I urge you to Expand the Critical Digital Infrastructure Overlay and Rezone the same area Industrial to maximize data center jobs and school funding.

An Expanded Overlay Rezoned Industrial is a win for Frederick County because:

- It limits data centers to less than 1% of the county's land and preserves 5 acres of farmland for every one acre of data center growth
- It will support Frederick jobs for Frederick residents during construction and operation of the Quantum Frederick campus, so more county residents can work closer to home instead of driving to Virginia
- It will provide an estimated \$215 million in annual tax revenue to help fund new schools and exceptional teachers for decades to come.
- It allows the county to comprehensively and thoughtfully plan for data centers now – rather than piecemeal in the future.

Please vote to Expand the CDI Overlay and Rezone Industrial. Doing so will maximize economic benefits from data center development while putting 99% of Frederick County off limits to data center growth.

Sincerely,

Roy Henise  
6107 Fulmer Rd  
Frederick, MD 21703  
readyrockroy64@gmail.com

**From:** Elyse Wilson <elysewilsonkhk@gmail.com>

**Sent:** Sunday, November 30, 2025 7:42 PM

**To:** Council Members <CouncilMembers@FrederickCountyMD.gov>; Carter, Mason <MCarter@FrederickCountyMD.gov>; Duckett, Kavonte <KDuckett@FrederickCountyMD.gov>; Young, Brad <BYoung@FrederickCountyMD.gov>; Knapp, Renee <RKnapp@FrederickCountyMD.gov>; Keegan-Ayer, MC <MCKeegan-Ayer@FrederickCountyMD.gov>; Donald, Jerry <JDonald@FrederickCountyMD.gov>; McKay, Steve <SMcKay@FrederickCountyMD.gov>

**Cc:** Planning Commission <PlanningCommission@FrederickCountyMD.gov>; County Executive <CountyExecutive@FrederickCountyMD.gov>

**Subject:** Imported Wages, Homegrown Pollution: The False Economy of the CDI Overlay

**[EXTERNAL EMAIL]**

Honorable Council Members,

I am writing to you today as an Adamstown resident to correct a dangerous narrative that has dominated the recent hearings regarding the Critical Digital Infrastructure (CDI) overlay.

Throughout the testimony, we have heard repeated claims from union representatives (specifically **IBEW** Locals 24 and 26) that this project is vital for "local jobs" and bringing revenue to Frederick County. This is a rhetorical sleight of hand that conflates "Union Jurisdiction" with "County Residency."

I urge you to consider the reality of this trade-off before you vote:

1. The "Local" Fallacy

When a union representative says a project is in "Local 24's jurisdiction," they are referring to a massive territory that extends all the way to Baltimore and beyond. They are not confirming that the workers live in Frederick.

The reality of a project this size is that the vast majority of the workforce will be travelers—skilled laborers commuting from Northern Virginia, Baltimore, and D.C.

\* The Result: They drive in, they work, and they take those high-dollar paychecks back to their home counties to pay their mortgages and taxes. The "economic multiplier" drives home with them at 5:00 PM.

2. The "Leftover" Reality



While the wages leave the county, the consequences of the industry stay here permanently.

\* The Pollution Does Not Commute: We are being asked to host millions of square feet of data centers backed up by massive banks of diesel generators. The particulate matter, the noise, and the environmental degradation settle in Adamstown's soil and our children's lungs.

\* The Bad Trade: We are effectively becoming a "sacrifice zone" for regional labor. You are being asked to degrade the long-term health of Frederick residents to provide temporary construction wages for a regional workforce.

### 3. Protect Your Constituents, Not the Region

We are not anti-worker; we are pro-community. But we cannot accept a deal where Adamstown bears 100% of the toxic health risks (Diesel/Noise/Water) while the primary economic benefit (wages) bleeds out to surrounding counties.

Please do not let the loud promise of "jobs" drown out the quiet reality of the health risks you are imposing on the people who actually live, vote, and raise families here.

Respectfully,  
Elyse Wilson  
Adamstown MD

**From:** Elyse Wilson <elysewilsonkhk@gmail.com>

**Sent:** Sunday, November 30, 2025 10:56 PM

**To:** shannon.heafey@maryland.gov; Council Members <CouncilMembers@FrederickCountyMD.gov>; County Executive <CountyExecutive@FrederickCountyMD.gov>; Duckett, Kavonte <KDuckett@FrederickCountyMD.gov>; Carter, Mason <MCarter@FrederickCountyMD.gov>; Knapp, Renee <RKnapp@FrederickCountyMD.gov>; Young, Brad <BYoung@FrederickCountyMD.gov>; Keegan-Ayer, MC <MCKeegan-Ayer@FrederickCountyMD.gov>; McKay, Steve <SMcKay@FrederickCountyMD.gov>; Donald, Jerry <JDonald@FrederickCountyMD.gov>

**Cc:** Linda Everett <linda@edgedesigngroupllc.com>; Paula damico-Hollewa <pdhollewa@yahoo.com>; Ricky mom Kim <ghog22@verizon.net>; FRANK HOLLEWA <fjhollewa@gmail.com>; mhdague@gmail.com; PHM <phmichael@comcast.net>

**Subject:** HALT Air Quality Permit for 99 Generators until Carroll Manor Elementary is Safe!

**[EXTERNAL EMAIL]**

**Dear Shannon Heafey MDE, County Executive Fitzwater and Council Members,**

I am writing to formally request that the **Draft Air Quality Permit for the 99 diesel generators** proposed for the Adamstown Data Center site be **withheld and not granted** until specific safety retrofits are completed at **Carroll Manor Elementary School**.

The nearest data center facility will be located just 1,974 feet from the school. Granting a permit for 99 industrial diesel generators—essentially a massive fossil fuel power plant—next to a school built in **1965** is negligent.

The 1965 wing of Carroll Manor possesses specific architectural vulnerabilities that make it incapable of protecting students from this volume of diesel particulate matter (PM2.5) and nitrogen oxides (NOx):

1. **Ground-Level Intake Vulnerability:** The 1965 classrooms rely on "Unit Ventilators" with intakes just feet above the ground. These will act as vacuums for the heavy diesel exhaust settling at ground level.
2. **Inability to Maintain Positive Pressure:** A 1965 building envelope is "leaky" and cannot maintain the positive pressure required to keep toxic fumes out during a generator test or fire event.
3. **Filtration Failure:** The existing HVAC infrastructure cannot handle the HEPA and Carbon filtration necessary to scrub the emissions from 99 generators.

**We demand that the Air Quality Permit be denied until the following conditions are met:**

- A **Dedicated Outdoor Air System (DOAS)** is installed to move all air intakes to the roof.
- A **Building Envelope Audit** confirms the school can be sealed against toxic plumes.
- **Carbon Filtration** is installed and operational.

You cannot permit 99 diesel generators to operate until you have proven the 60-year-old building next door can keep the exhaust out.

Sincerely,

Elyse Wilson Adamstown, MD

**From:** Darren Andrews <Darren@talon-construction.com>  
**Sent:** Monday, December 1, 2025 9:10 AM  
**To:** Council Members <CouncilMembers@FrederickCountyMD.gov>  
**Subject:** PLEASE PREVENT EXPANSION of the DATA CENTER ZONES

**[EXTERNAL EMAIL]**

County Council,

As a child, I grew up in downtown Adamstown. I have fond memories of the yearly carnivals, firemen's softball games, bailing hay, and the farmlands. I still live in Adamstown and have obviously seen a lot of growth. No more carnival grounds, no more firemen's softball games, and disappearing farmlands. I work in the construction field, so I'm not afraid of construction and to a point..... welcome it. I wasn't a big proponent of the data center, but given all the options, it was probably the best choice. The growth that I have seen has been spread out over the entire county although, I am perplexed as to why it seems that Southern Frederick County seems to bear a sizable brunt of this expansion. The distance between Adamstown and Frederick has grown to such a narrow point that it seems Adamstown is now a part of Frederick. The narrowing of distance can be said for the northern town of Thurmont and the eastern towns of New Market and Monrovia. I'm not sure why there has been little to no expansion into the Middletown Valley, but that's a discussion for another time.

Having said all of this, I would like to make my opinion be made known that I am 100% against expanding the critical digital infrastructure overlay zone outside of the existing growth area. Furthermore, I am against redrawing any Rural Legacy Area or Priority Preservation Area lines period. There should never be any data centers or any industrial buildings next to homes anywhere with a setback of less than 2,640 ft. or ¼ mile. We have lost so much of our protected lands that I feel it important not to sacrifice any more. In short, I am asking that the Council uphold the Planning Commissions recommendation to **STOP** substantive expansion of the Eastalco Growth Area.

Data centers are gaining attention nationally. Frederick County shouldn't want to be the face of getting it wrong. We've already allowed the use of over 2,000 acres for this purpose without fully understanding the potential ramifications of what we're doing. Things like electricity, power, regulatory oversight to name a few are part of these potential ramifications. Let's hit pause and see what we have already done leads. **Vote to not allow any further expansion!**

Thank you,

**Darren Andrews, Certified Graduate Remodeler (CGR)**  
**Remodeling Consultant / Estimator**  
**State of MD - Master Plumber**

Talon Construction, Inc.  
302 East 4th Street  
Frederick, MD 21701  
P-301-620-8604 x202  
Email: [darren@talon-construction.com](mailto:darren@talon-construction.com)  
Web: [www.talon-construction.com](http://www.talon-construction.com)



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**From:** L R <romdiver@gmail.com>

**Sent:** Monday, December 1, 2025 9:29 AM

**To:** Council Members <CouncilMembers@FrederickCountyMD.gov>

**Subject:** Data Centers

**[EXTERNAL EMAIL]**

Dear Council Member:

I'm embarrassed by the way the Council has fallen in line with the Data Center steamroller:

1. First, the unprotected workers you allowed on an EPA toxic waste site;
1. Second, the power line - we both know it's not just going to Virginia;
2. Next, bribing residents with easement buyouts for its fibre optic cables;
3. And now, "9,800 new jobs at an average salary of \$115,000"\*. That is, of course, only during construction. Once online, data centers average about 50 workers.

I forget, when's the next election?

L.D. Romane, M.D.

\* "The Frederick News Post" 12/1/25



**From:** sandy doggett <sdoggett@gmail.com>  
**Sent:** Monday, December 1, 2025 9:36 AM  
**To:** Council Members <CouncilMembers@FrederickCountyMD.gov>  
**Subject:** Stop Data Centers

**[EXTERNAL EMAIL]**

Dear Council Members,

Please limit the number of acres allotted to data centers.

Please don't add any more acres reserved for the data centers.

I agree with Jerry Donald, let's see how the current allocation affects our region before we commit to more.

I am concerned about electricity and water usage in our county. Our electric bills have already skyrocketed.

Please do not increase the acreage beyond what has already been approved.

Sincerely,

Sandra L. Doggett

Voter in Frederick County, MD

--

Sandra L. Doggett

3752 Bittle Rd, Myersville, MD 21773

301-293-2914

[sdoggett@gmail.com](mailto:sdoggett@gmail.com)

**From:** Betty Anne Cox <coxba120@sbcglobal.net>  
**Sent:** Monday, December 1, 2025 7:44 AM  
**To:** Council Members <CouncilMembers@FrederickCountyMD.gov>  
**Cc:** County Executive <CountyExecutive@FrederickCountyMD.gov>  
**Subject:** Sugarloaf Overlay Zone

**[EXTERNAL EMAIL]**

Dear Members of Frederick County Government,

I write once again to urge you to make certain the size of the Overlay Zone is maintained. As a resident of Buckingham's Choice, I am very concerned about the future of the surrounding area. The owners of farms and other properties in this neighborhood are at grave risk. As elected and appointed governing officials, we are counting on your wisdom and experience to maintain control of this important issue and to protect the future of this valuable land. As many have said in the past, "Land is the one asset that can't be replaced." We're counting on you.

Thank you for your past efforts and good luck with the future challenges.

Elizabeth A Cox

3200 Baker Circle

Adamstown, MD 21710

**From:** Adamstown Resident <residentadamstown@gmail.com>

**Sent:** Sunday, November 30, 2025 8:24 PM

**To:** Council Members <CouncilMembers@FrederickCountyMD.gov>; Young, Brad <BYoung@FrederickCountyMD.gov>; Knapp, Renee <RKnapp@FrederickCountyMD.gov>; Keegan-Ayer, MC <MCKeegan-Ayer@FrederickCountyMD.gov>; Duckett, Kavonte <KDuckett@FrederickCountyMD.gov>; Carter, Mason <MCarter@FrederickCountyMD.gov>; McKay, Steve <SMcKay@FrederickCountyMD.gov>; Donald, Jerry <JDonald@FrederickCountyMD.gov>

**Cc:** County Executive <CountyExecutive@FrederickCountyMD.gov>; Planning Commission <PlanningCommission@FrederickCountyMD.gov>

**Subject:** Correcting the Record: Regional Union "Jurisdiction" is NOT Frederick Residency

**[EXTERNAL EMAIL]**

Honorable Council Members,

I am writing to formally address a significant inaccuracy that has been repeated throughout the CDI overlay hearings regarding workforce and economic impact.

In their testimony, representatives from the IBEW and other trade unions have repeatedly used the phrases "Local Jurisdiction" and "Local Members" to imply that the workforce for these proposed data centers consists of Frederick County residents.

This is factually misleading, and the Council must distinguish between union territory and voter residency.

**1. "Local 24" is a Regional Designation, Not a Zip Code**

When testimony states that a project falls under "Local 24 jurisdiction," it refers to a massive administrative boundary that includes Baltimore City, Baltimore County, and huge swaths of the Eastern Shore.

\* A worker living in Glen Burnie or Catonsville is a "Local 24 member."

\* Hiring them does not constitute "hiring from Frederick."

\* Approving this project based on "local jobs" statistics that include residents of Baltimore is a disservice to your actual constituents.

## **2. The Economic Leakage Factor**

The Council is basing its decision on the assumption that wages earned here will circulate here. However, data center construction requires a volume of skilled labor that far exceeds Frederick's internal supply.

The result will be a workforce dominated by commuters—travelers from D.C., Northern Virginia, and Baltimore. These workers will extract wages from our county and spend them in their home jurisdictions. Frederick gets the traffic; other counties get the income tax and mortgage payments!

## **3. The Verdict**

You cannot balance the budget of the CDI overlay using "outsider math." We are being asked to accept 100% of the environmental degradation (diesel generators, noise, water usage) in exchange for wages that largely leave the county every evening.

Please base your vote on the reality of who actually lives here, not the misleading geography of union jurisdictions.

Respectfully,

Mrs Wilson  
Adamstown, MD

**From:** Elyse Wilson <elysewilsonkhk@gmail.com>

**Sent:** Sunday, November 30, 2025 10:42 PM

**To:** Council Members <CouncilMembers@FrederickCountyMD.gov>; Young, Brad <BYoung@FrederickCountyMD.gov>; Knapp, Renee <RKnapp@FrederickCountyMD.gov>; Keegan-Ayer, MC <MCKeegan-Ayer@FrederickCountyMD.gov>; Duckett, Kavonte <KDuckett@FrederickCountyMD.gov>; Donald, Jerry <JDonald@FrederickCountyMD.gov>; McKay, Steve <SMcKay@FrederickCountyMD.gov>; Carter, Mason <MCarter@FrederickCountyMD.gov>

**Cc:** Planning Commission <PlanningCommission@FrederickCountyMD.gov>; County Executive <CountyExecutive@FrederickCountyMD.gov>; Paula damico-Hollewa <pdhollewa@yahoo.com>; FRANK HOLLEWA <fjhollewa@gmail.com>; Linda Everett <linda@edgedesigngroupllc.com>; mhdague@gmail.com; PHM <phmichael@comcast.net>; Gene Butler <rollbackfarmer@comcast.net>; Hope Green <hope.green76@yahoo.com>; firefighterdeb53@aol.com

**Subject:** CDI Overlay Vote: Why Adamstown Should Not Bear 100% of the Toxic Risk for Commuter Revenue

**[EXTERNAL EMAIL]**

Honorable Council Members,

I am writing to you as a resident of Adamstown to state clearly that my community refuses to be the collateral damage for Frederick County's "economic development."

The testimony we have heard from IBEW and other unions focuses entirely on the regional benefits of these data centers. They speak of "Local 24" (Baltimore) and "Local 26" (D.C./NoVA) as if those jurisdictions are the same as the neighborhoods where we raise our children. They are not!

**1. Adamstown is the Sacrifice Zone**

The "deal" before you is simple but unbalanced:

\* The Region gets the wages (commuters driving back to NoVA/Baltimore).



\* The County gets the tax revenue.

\* Adamstown gets the diesel exhaust, the noise pollution, and the water depletion.

## **2. The "Local" Lie**

We are being told this project is for "local jobs." But when the shift ends, the vast majority of that workforce will drive away. They will not be here to breathe the particulate matter from the backup generators. They will not be here to hear the hum of the cooling systems. We will.

## **3. Protect Your Constituents**

As my representatives, your duty is to the people who sleep in District 2, not the people who commute here for a paycheck. Do not vote to permanently degrade our quality of life just to secure temporary construction wages for a workforce that lives in other counties.

See attached picture of the 7 Busses that they use Daily to bring in the Workers. We all see this.

**Please vote NO on the CDI overlay and protect Adamstown.**

Sincerely,

Elyse Wilson  
Adamstown, MD















**From:** Steve Black <steveblack2313@gmail.com>

**Sent:** Sunday, November 30, 2025 6:24 PM

**To:** Council Members <CouncilMembers@FrederickCountyMD.gov>; County Executive <CountyExecutive@FrederickCountyMD.gov>; Planning Commission <PlanningCommission@FrederickCountyMD.gov>

**Subject:** Don't expand the data center zone until you study ALL the possibilities

**[EXTERNAL EMAIL]**

Council Members,

Of all the things that bother me about data center sprawl, this one was not (as the kids say) on my bingo card.

"For the hundreds of communities who've been saddled with data centers in recent years, the bulky fixtures are sources of unbearable noise, soaring energy prices, and plenty of electrical fires.

Add another grim possibility to that list: debilitating rare cancers."

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ARTIFICIAL INTELLIGENCE ETHICS

TOXIC NEIGHBOR

# Amazon Data Center Linked to Cluster of Rare Cancers

"The historical precedent here is Flint, Michigan."

By **Joe Wilkins** / Published **Nov 29, 2025 8:15 AM EST**



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THE COOL KIDS ARE READING

Illustration by Tag Hartman-Simkins / Futurism. Source: Emmanuel Dandand / AFP via Getty Images

For the hundreds of communities who've been saddled with data centers in recent years, the bulky fixtures are sources of unbearable noise, soaring energy prices, and plenty of electrical fires.

Add another grim possibility to that list: debilitating rare cancers.

Reporting on the "data center boom" in the state of Oregon, *Rolling Stone* tells the story of Jim Doherty, a cattle rancher and former county commissioner of Morrow, in eastern Oregon.

Doherty's story began when he noticed a rise in bizarre medical conditions among the county's 45,000 residents, linked to toxins in the local water. Working with the county health office, the rancher-turned-official began a survey of 70 wells throughout his jurisdiction — 68 of which, his testing found, violated the federal limit for nitrates in drinking water.

Meet the Group Breaking People Out of AI Delusions

By **Maggie Harrison Dupré**

Giant AI-Generated Christmas

Of the first 30 homes he visited, Doherty told *RS* that 25 residents had recently had miscarriages, while six had lost a kidney. “One man about 60 years old had his voice box taken out because of a cancer that only smokers get, but that guy hadn’t smoked a day of his life,” he told the publication.

But the spike in cancer-causing pollution wasn’t just the fault of local farms, as Doherty expected. It had its roots in a 10,000 square foot data center by the commerce giant Amazon, which [first went online](#) in Morrow County in 2011.

Basically, the allegations go like this: industrial megafarms operating in the area are responsible for churning out millions of gallons of wastewater, laden with nitrates from fertilizers. All that waste has to go somewhere, which is one way of saying it mostly ends up in the ground.

Amazon’s hulking data center, thirsty for water to cool its blazing hot computer chips, supercharged this process, adding millions of gallons of wastewater a year to the heavy volume of farm runoff, which Morrow County was already struggling to keep up with. Soon even the deepest reaches of the local aquifer were tainted, according to *RS*, as huge volumes of data center and agricultural wastewater saturated the water table.

This meant that the data center itself began taking on the toxic sludge as it drew on groundwater to cool its electronics. When it did, evaporation only further concentrated the wastewater, which occasionally contained nitrate levels eight times higher than Oregon’s safe limit. The super concentrated data center water then made its way back into the waste system, where it ostensibly piled up all over again.

In response to the allegations, Amazon spokesperson Lisa Levandowski said that “our data centers draw water from the same supply as other community members; nitrates are not an additive we use in any of our processes, and the volume of water our facilities use and return represents only a very small fraction of the overall water system — not enough to have any meaningful impact on water quality.”

Morrow County residents, however, beg to differ.

“The historical precedent here is Flint, Michigan,” Kristin Ostrom, executive director of activist group Oregon Rural Action (ORA), told *RS*. “In part because of how slow the response to the crisis has been, and in part because of who’s affected. These are people who have no political or economic power, and very little knowledge of the risk.”

“How can you live with yourself knowing that the water you put in people’s houses is causing miscarriages or cancer, or God only knows how it stunts the growth of a kid?” area resident Kathy Mendoza told *RS*.

Mendoza, along with members ORA, told the outlet she’s suffering an excruciating joint and muscle condition brought about by exposure to nitrates.

“How could they do that? Then these people go out and show their faces in public,” she continued. “And they’re still making money with it, every time those deals get cut for new data centers.”

**More on data centers:** [Meta’s \\$27 Billion Datacenter Is Wreaking Havoc on a](#)

Decoration Being Torn Down After Residents Noticed Grotesque Horrors Hidden in It

By [Victor Tangermann](#)

Robot Walks for Three Days Straight, Hotswapping Its Battery Over and Over in New World Record

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**Joe Wilkins**  
**Correspondent**

I'm a tech and transit correspondent for Futurism, where my beat includes transportation, infrastructure, and the role of emerging technologies in governance, surveillance, and labor.



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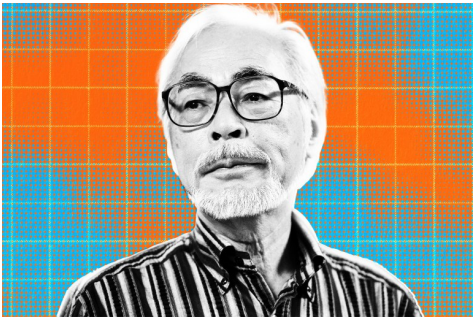


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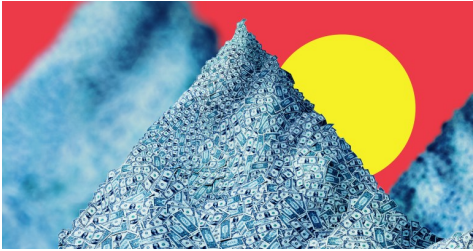
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## ing Up Against AI Data



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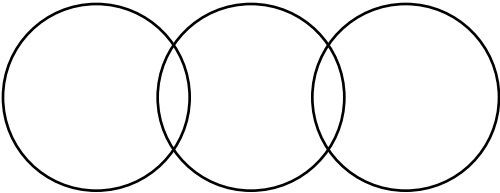
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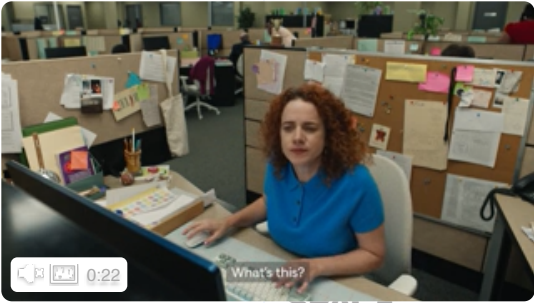
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**From:** Frankie Shipper <fcshipper@gmail.com>

**Sent:** Sunday, November 30, 2025 4:53 PM

**To:** Council Members <CouncilMembers@FrederickCountyMD.gov>

**Cc:** County Executive <CountyExecutive@FrederickCountyMD.gov>; Planning Commission  
<PlanningCommission@FrederickCountyMD.gov>

**Subject:** CDI Overlay hearing Dec. 16 input

**[EXTERNAL EMAIL]**

Council Members:

Please accept the attached letter for inclusion in the record of public input at the December 16 hearing on Data Centers.

Thank you,

Frankie Shipper

## **Frank M. & Frances C. Shipper**

3200 Baker Circle Apt. I-220  
Adamstown, Maryland 21710  
(443) 783-4319

Frederick County Council Members:

Brad W. Young, Kavonte Duckett, Jerry D. Donald, Steven J. McKay,  
M.C. Keegan-Ayer, Mason Carter, Renee Knapp

December 1, 2025

Dear Elected Officials:

We have followed the issues concerning the data centers being developed in Frederick County since this past summer. We realize that you have been addressing the surrounding issues much longer and support the public policy of balancing the needs of various interests. As retired residents, we want you to include our input into the record for the December 16 hearing, as well as for your decision making session following.

As signatories on the letter from Buckingham's Choice on July 6 and in our emailed letter to you on August 14, we laid out our concerns and our requests. In the interests of your time and ours, we won't repeat those since you already have those on file. For purposes of the narrower issue before you in the upcoming hearings, i.e., the CDI overlay, we want you to consider our specific requests:

1. Data centers expansion should be limited to the current Eastalco site until a professional cost benefit analysis can be performed by a qualified person or firm, unaffiliated with the companies building or using the centers. That includes risks of water and electricity demands beyond what's foreseeably available. Without that, the Council is operating in the dark.

2. The needs of the communities most directly affected by the construction and operation of the Centers should be given priority over those voiced by people or companies that will have no personal "skin in the game." Listening to those people who have come to the hearings tells a harrowing tale of anxieties associated with proximity to the huge structures. Whether noise, construction particulates in the air, devaluation of generational properties, loss of viewsapes and natural resources pressures, these are all legitimate fears that deserve a large weight in your deliberation.

We love living in this area of Maryland and trust leaders like yourselves to preserve the natural setting we enjoy. Although we have no data centers right outside our door, the proposed CDI brings the probability too close for comfort.

AND one final thought, what if the technology continues to change (which it will) and these huge, disruptive structures that scar our landscapes become obsolete and the industries they serve move on to smaller, less expensive servers and storage facilities?? Then, it will be the job of this Council or a succeeding one to solve an even bigger problem.

Sincerely,



Cc: Frederick County Council Executive Jessica E. Fitzwater

---

**From:** Elyse Wilson <[elysewilsonkhk@gmail.com](mailto:elysewilsonkhk@gmail.com)>

**Sent:** Wednesday, November 26, 2025 11:06 PM

**To:** Young, Brad <[BYoung@FrederickCountyMD.gov](mailto:BYoung@FrederickCountyMD.gov)>; Knapp, Renee <[RKnapp@FrederickCountyMD.gov](mailto:RKnapp@FrederickCountyMD.gov)>; Donald, Jerry <[JDonald@FrederickCountyMD.gov](mailto:JDonald@FrederickCountyMD.gov)>; McKay, Steve <[SMcKay@FrederickCountyMD.gov](mailto:SMcKay@FrederickCountyMD.gov)>; Duckett, Kavonte <[KDuckett@FrederickCountyMD.gov](mailto:KDuckett@FrederickCountyMD.gov)>; Carter, Mason <[MCarter@FrederickCountyMD.gov](mailto:MCarter@FrederickCountyMD.gov)>; Keegan-Ayer, MC <[MCKeegan-Ayer@FrederickCountyMD.gov](mailto:MCKeegan-Ayer@FrederickCountyMD.gov)>; Council Members <[CouncilMembers@FrederickCountyMD.gov](mailto:CouncilMembers@FrederickCountyMD.gov)>; County Executive <[CountyExecutive@FrederickCountyMD.gov](mailto:CountyExecutive@FrederickCountyMD.gov)>

**Cc:** Paula damico-Hollewa <[pdhollewa@yahoo.com](mailto:pdhollewa@yahoo.com)>; FRANK HOLLEWA <[fjhollewa@gmail.com](mailto:fjhollewa@gmail.com)>; Linda Everett <[linda@edgedesigngroupllc.com](mailto:linda@edgedesigngroupllc.com)>; [mhdague@gmail.com](mailto:mhdague@gmail.com); Hope Green <[hope.green76@yahoo.com](mailto:hope.green76@yahoo.com)>; Gene Butler <[rollbackfarmer@comcast.net](mailto:rollbackfarmer@comcast.net)>; [firefighterdeb53@aol.com](mailto:firefighterdeb53@aol.com); PHM <[phmichael@comcast.net](mailto:phmichael@comcast.net)>; Ricky mom Kim <[ghog22@verizon.net](mailto:ghog22@verizon.net)>

**Subject:** The Day Before Thanksgiving Holiday in Adamstown and wondering what our life will be like next year.

[EXTERNAL EMAIL]

## **Socio-Technical Analysis of Critical Digital Infrastructure Expansion in Frederick County, Maryland: Land Use, Environmental Equity, and Public Health Implications**

### **Executive Summary**

As the true scale of the Quantum Loophole project in Adamstown comes into focus, residents are right to question the legacy our elected officials are leaving behind. Research confirms that at full build-out, this campus is projected to house over **1,000 diesel generators**. Despite knowing that diesel is one of the dirtiest forms of emergency energy, Frederick County officials approved this proliferation of toxic infrastructure rather than demanding safer alternatives. **We need only look to Chantilly, Virginia, where developers like Penzance are breaking ground on data centers that utilize advanced liquid cooling technologies to manage heat safely and efficiently.**

**Why is Frederick County replicating the outdated, hazardous mistakes of Ashburn instead of mandating the forward-thinking technology used in Chantilly?** It is imperative that County Executive Jessica Fitzwater pause to consider

these safer alternatives. Furthermore, Catellus's recent analysis relies on misleading data—inflating post-construction job numbers (which average only 25 per building) and falsely claiming that pollution is limited to the construction phase, ignoring the long-term toxicity of diesel generators.

## 1.2 The Quantum Loophole Vision vs. Rural Reality

The physical anchor of this transformation is the Quantum Loophole campus. Situated on the

The sheer magnitude of the project—projected to consume over 1 gigawatt (GW) of power, with full buildout estimates reaching 2 GW—places a burden on the local grid equivalent to the consumption of hundreds of thousands of homes. This necessitates not just the redevelopment of the smelter site but the construction of new high-voltage transmission lines and substations that extend beyond the industrial footprint, visually dominating the rural skyline.<sup>1</sup>

**The criticism that Fitzwater is turning the area into Ashburn is rooted in this visual and infrastructural metamorphosis.** Residents who moved to Adamstown for its "Rural Legacy" character—rolling farmlands, the Monocacy River viewshed, and quietude—are now confronting a landscape defined by the geometry of hyperscale computing. The fear is not just of the buildings themselves, but of the precedent they set: that South Frederick is no longer an agricultural reserve, but an industrial utility zone for the National Capital Region.

## 2. Land Use and Zoning: The Mechanics of the 2,200+ Acre Expansion

### 2.1 The "Critical Digital Infrastructure" (CDI) Overlay Zone

The legislative vehicle driving this controversy is the "Critical Digital Infrastructure" (CDI) Overlay Zone. In urban planning, an overlay zone is a regulatory tool used to apply specific standards to a designated area, superseding or adding to the underlying zoning. The Fitzwater administration frames the CDI Overlay as a restrictive measure, intended to contain data centers to specific suitable areas rather than allowing them "by right" in all industrial zones.<sup>7</sup>

However, opponents view the CDI Overlay as a Trojan horse for expansion. While the initial Quantum Loophole purchase covered roughly 2,100 to 2,200 acres, the legislation crafting the CDI Overlay discussed a cap of 1% of the county's total landmass. In Frederick County, 1% equates to approximately **4,200 acres**.

This numerical discrepancy—between the 2,200-acre physical project and the 4,200-acre legislative ceiling—is the crux of the "expansion" allegation. Residents argue that by legislating a cap that is nearly double the size of the current massive project, the county is explicitly authorizing the future annexation of an additional 2,000 acres of

farmland into the data center zone.<sup>5</sup>

## 2.2 The "Floating Zone" Vulnerability

The mechanism by which this expansion would occur is the "floating zone." Unlike a fixed zoning map where boundaries are static, a floating zone is a set of criteria written into the code. If a developer secures a piece of land that meets these criteria (e.g., proximity to high-voltage lines, sufficient acreage) and petitions the county, the zone "lands" on that property.

Critics, including the Sugarloaf Alliance and local preservationists, argue that floating zones destabilize land use planning. They create a speculative market where developers are incentivized to option agricultural land adjacent to the CDI zone, anticipating that they can successfully petition to apply the Overlay. **This is precisely the pattern that fueled the sprawl in Northern Virginia, where "by right" development or easy rezoning allowed data centers to consume vast tracts of farmland piecemeal.**<sup>6</sup>

**The specific grievance—that the county is "expanding... before initial ones are finished"—reflects a desire for a "pause and study" approach.** The Quantum Loophole project is still in its early construction phases. Its impact on traffic, aquifers, air quality, and the viewscape is theoretical rather than experienced. By pushing through legislation that **authorizes double the acreage before the first phase is operational, the administration is seen as prioritizing industry certainty over community due diligence. The fear is that once the 4,200-acre entitlement is codified, it will be legally difficult to reverse, effectively locking Adamstown into a future of continuous industrial construction for decades.**<sup>1</sup>

## 2.3 The "Spot Zoning" of the Agricultural Reserve

The geography of the proposed expansion exacerbates the tension. The land immediately surrounding the Eastalco site includes parcels currently zoned for agriculture. To reach the 4,200-acre cap, the Overlay would necessarily have to absorb these agricultural parcels. This process, often derided as "spot zoning," involves changing the designation of specific parcels to suit a developer's needs, often contrary to the surrounding land use pattern.

The Sugarloaf Alliance and other advocacy groups have pointed out that this piecemeal expansion threatens the integrity of the Sugarloaf Treasured Landscape Management Plan. If data centers are allowed to encroach upon the view of Sugarloaf Mountain or the Monocacy battlefield, the county is violating its own



comprehensive plan goals in service of digital infrastructure. The comparison to Ashburn is apt here as well: in Loudoun, data centers initially clustered near the airport but eventually sprawled westward, consuming historic landscapes and encroaching on rural villages.<sup>4</sup>

### 3. The 5:1 Preservation Ratio: Geographic Equity and the "Sacrifice Zone"

#### 3.1 The Policy Logic: Preservation as Mitigation

In an attempt to offset the loss of farmland to data centers, the Fitzwater administration introduced a preservation mandate: for every 1 acre of land rezoned for Critical Digital Infrastructure, the developer must fund the preservation of 5 acres of agricultural land elsewhere in the county. On the surface, this "5-to-1" ratio appears to be a robust conservation win, theoretically resulting in a net increase in protected acreage.<sup>12</sup>

However, the implementation of this policy interacts with the unique economic geography of Frederick County, leading to what critics call a "geographic wealth transfer" or a "sacrifice zone" **dynamic since it's being stolen from Adamstown and then given to Thurmont!**

#### 3.2 The North-South Divide: Thurmont vs. Adamstown

Frederick County is effectively bifurcated into two distinct land use zones:

- 1.
  - 2.
  3. **South County (Adamstown,**
  4. **Urbana, Hyattstown):** This region
  5. sits along the I-270 technology corridor. It is experiencing intense development pressure, high land values, and rapid suburbanization. The farms here are often smaller, fragmented by subdivisions, and priced at "development potential" rates.
  - 6.
  - 7.
  - 8.
- North County (Thurmont,**

9.

10. **Emmitsburg, Rocky Ridge):** This

11. region remains deeply rural, characterized by large contiguous farms, the Catoctin Mountains, and lower development pressure. Land values here reflect agricultural utility rather than commuter-belt speculation.

12.

### 3.3 The Mechanics of Inequity

**The "5-to-1" policy creates a market for agricultural easements. When a developer in Adamstown destroys a farm to build a data center, they pay into the preservation fund (or purchase easements directly).**

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- **Where does the money go?**
- Preservation programs like the Maryland Agricultural Land Preservation Foundation (MALPF) prioritize purchasing easements on large, contiguous blocks of high-quality farmland to maximize the impact of state dollars.
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- **The Result:**
- The cost-saving farms for preservation are overwhelmingly located in North County. The dollars generated by the destruction of the South's rural landscape flow north to preserve the viewsapes of Thurmont.<sup>14</sup>
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### 3.4 The "Sacrifice Zone" Narrative

Residents of Adamstown and South Frederick argue that this policy codifies their status as a "sacrifice zone." They bear the burden of industrialization—the noise, the traffic, the loss of *their* local farms—while the "mitigation" benefits a community 20 miles away.

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### Loss of Local Legacy:

- For a family in Adamstown, the preservation of a farm in Thurmont does nothing to mitigate the loss of the cornfield next door that is now a 50-foot concrete wall. Their "Rural Legacy" is erased, not preserved.
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- **Wealth Transfer: The policy is viewed as utilizing**
- **the South's land value to subsidize the North's quality of life. The South gets the diesel generators and the substations; the North gets the open space and the preservation payments.**
- 

This dynamic reinforces the "**Ashburn**" **comparison**, where the eastern and southern parts of Loudoun County were industrialized to subsidize the tax base, while the western "hunt country" remained preserved. South Frederick residents see the "5-to-1" ratio not as a victory for the county, but as a formal declaration that their rural identity is for sale, provided the proceeds are spent elsewhere.<sup>12</sup>

## The Diesel Dilemma: Toxic Emissions and the Chantilly Contrast

### 4.1 The Aligned Data Center Permit: A Fossil Fuel Power Plant in Disguise

The most technically contentious aspect of the "Ashburn-ification" debate concerns power reliability. Data centers require 100% uptime (Tier IV standards). The grid cannot guarantee this, so facilities install on-site backup generation. In Frederick, Aligned Data Centers has applied for a permit to install **168 diesel generators** at their Adamstown campus.<sup>19</sup>

Each generator is rated at approximately 3,000 kilowatts (3 MW). The total capacity approaches **504 megawatts (MW)**. To put this in perspective, 504 MW is roughly the output of a medium-sized coal or natural gas power plant. By permitting this array, Frederick County is effectively authorizing the construction of a fossil fuel power station in the middle of a residential/agricultural zone, distributed across 168 exhaust stacks.

### 4.2 The Chemistry of Concern: NOx and Particulates

The "toxic" label used by opponents is grounded in the chemical composition of diesel exhaust.

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- 
- **Nitrogen Oxides (NOx):**
- Diesel engines are major sources of NOx. In the presence of sunlight, NOx reacts with volatile organic compounds (VOCs) to form ground-level ozone (smog). The Monocacy Valley topography can trap these pollutants, exacerbating local air quality issues.
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- 
- **Diesel Particulate Matter**
- **(DPM/PM2.5):** These fine particles
- can penetrate deep into the lungs and enter the bloodstream. DPM is classified as a likely carcinogen and is a known trigger for asthma, cardiovascular disease, and respiratory distress.<sup>21</sup>
- 

While the industry argues these generators are for "emergency use only," the operational reality involves regular testing (weekly or monthly) and maintenance runs. Furthermore, as grid strain increases (partly due to data center demand), the definition of "emergency" may expand to include "demand response" events where generators are run to shave peak load.<sup>22</sup>

#### 4.3 The Comparison to Chantilly (Fairfax County)

Northern Virginia, having lived with data centers for two decades, is now imposing strict retrofits and new standards. **Frederick, entering the market late, is accused of accepting the "old" standards that Virginia is rejecting.**

#### Fairfax County's Evolution:

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- **Cleaner Tech Pressure:**
- There is significant political pressure in Fairfax and Loudoun to abandon diesel entirely in favor of natural gas microgrids, battery energy storage systems

(BESS), or hydrogen fuel cells. While not yet a total ban, the regulatory friction against diesel is

- high.<sup>25</sup>
- 

#### **Frederick's Status Quo:**

**In contrast, Frederick County is perceived as rolling out the red carpet for diesel.** The Aligned permit application for 168 diesel units suggests that the county has not leveraged its "late mover advantage" to demand better technology. Instead, it is accepting the standard industrial package that maximizes developer profit at the expense of local air quality. Critics argue that if Frederick wants to avoid being Ashburn, it should be mandating BESS or hydrogen now, rather than permitting a 20-year lifecycle of diesel infrastructure.<sup>28</sup>

### **5. Public Health at the Fence Line: Carroll Manor Elementary and "Seal and Safe"**

#### **5.1 The Geometry of Risk: 5601 Manor Woods vs. 5624 Adamstown Road**

The abstract debate over zoning becomes tangible at the property line shared by the proposed Aligned Data Center (5601 Manor Woods Road) and **Carroll Manor Elementary School** (5624 Adamstown Road). The physical proximity is stark—the industrial site effectively wraps around the school property.

**Schools are considered "sensitive receptor" sites in environmental epidemiology. The occupants (children aged 5-11) are biologically more vulnerable to air pollution than adults. Their lungs are still developing, they have higher respiration rates relative to body size, and they spend significant time outdoors during recess.**<sup>24</sup>

#### **5.2 The "Seal and Safe" Deficit: An Engineering Analysis**

The specific grievance regarding the lack of "Seal and Safe" retrofits points to a failure in protective infrastructure planning. "Seal and Safe" (often synonymous with "Shelter-in-Place" capability) refers to a building's ability to isolate its interior atmosphere from a hazardous exterior event.

#### **The 1965 Vulnerability:**

Carroll Manor Elementary was constructed in 1965.<sup>1</sup> School architecture from this era is characterized by:

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- **Permeable Envelopes:**
- Single-pane windows with aging seals, unsealed masonry joints, and "leaky" door frames allow significant air infiltration.
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- **Negative Pressure:**
- Older HVAC systems often create negative pressure zones (due to kitchen/restroom exhaust fans) that actively
- *pull*
- untreated outside air into the building through cracks.
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- **Basic Filtration:**
- Filtration systems in 1960s schools are typically designed to protect the equipment from dust (MERV 6-8), not to protect human lungs from fine chemical particulates (which require MERV 13+ or HEPA).
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### **The Missing Retrofit:**

**If a data center with 168 diesel generators experiences a catastrophic failure, a fire, or a mass-testing event during an atmospheric inversion, the plume could engulf the school. A "Seal and Safe" retrofit would involve:**

- 1.
- 2.
3. **Tightening the Envelope:**
4. Replacing windows and doors with airtight, energy-efficient models.
- 5.
- 6.
- 7.
8. **Positive Pressure HVAC:**
9. Upgrading the ventilation system to maintain positive indoor pressure, pushing air
10. *out*
11. of cracks rather than sucking it in.
- 12.

- 13.
- 14.
15. **HEPA Filtration:**
16. Installing hospital-grade filters capable of scrubbing diesel particulates from the intake air.
- 17.
- 18.
- 19.
20. **Automated Dampers:**
21. Sensors that detect outside pollutants and automatically close air intakes to recirculate indoor air.
- 22.

**The community's anger stems from the fact that the county is approving the risk generator (the data center) without mandating or funding the risk mitigator (the school retrofit). Parents view this as a dereliction of the county's duty of care (in loco parentis). They argue that the tax revenue from the data center should have been *pre-allocated* to modernize the school's defenses before the first permit was issued. The failure to do so implies that the health of the students is secondary to the speed of industrial deployment.<sup>31</sup>**

### 5.3 The Intergenerational Inequity

The juxtaposition of a billion-dollar, state-of-the-art digital campus next to a decaying 1960s public school highlights a profound inequity. The data center is built to "Tier IV" resilience standards—it is designed to survive disasters, grid failures, and attacks. The school, conversely, is described in county documents as having a fire station neighbor in "poor" condition and being part of an aging inventory.<sup>30</sup> The message received by the community is that the servers are safe, but the children are exposed.

## 6. Political Analysis: The "Frederick Way" vs. Community Trust

### 6.1 The "Compromise" Narrative

County Executive Jessica Fitzwater has consistently framed her approach as the "Frederick Way"—a middle path that accepts the economic reality of the data center industry but regulates it more strictly than Virginia.<sup>8</sup> Her administration points to the existence of the Data Centers Workgroup and the sheer complexity of the CDI Overlay as evidence of due diligence.

However, the "compromise" has failed to satisfy the opposition because the starting point of the negotiation (2,200 acres) was already viewed as extreme. By proposing a cap (4,200 acres) that allows for doubling the footprint, the "restriction" feels like an "expansion" to residents.

## 6.2 The Erosion of Trust

The involvement of groups like the Sugarloaf Alliance indicates a breakdown in trust. These groups, which often ally with progressive administrations on conservation issues, feel betrayed by the pace and scale of the data center rollout. The "disappointment" expressed regarding the Planning Commission votes and the vetoing of stricter moratoriums suggests that the administration has expended significant political capital.<sup>34</sup>

The perception is that the county is "captured" by the potential tax revenue. Data centers offer a massive injection of assessable base with minimal demand on county services (no children to educate). This fiscal allure is seen as blinding the administration to the tangible quality-of-life costs paid by Adamstown residents.

## 7. Conclusion: The Reality of "Another Ashburn"

The assertion that Jessica Fitzwater is turning Adamstown into "another Ashburn" is not merely hyperbolic rhetoric; it is a technically and geographically grounded critique of current policy trajectories.

1.

2.

3. **Connectivity:**

4. The QLoop fiber ring physically and digitally annexes Frederick to the Ashburn ecosystem, ensuring that the county serves as a satellite for Loudoun's overflow.

5.

6.

7.

8. **Land Use:**

9. The legislative gap between the current project (2,200 acres) and the proposed cap (4,200 acres) creates a "floating zone" market that incentivizes the very sprawl the administration claims to prevent.

10.

11.

12.

13. **Inequity:**

14. The "5-to-1" preservation ratio facilitates a structural transfer of rural character from the South to the North, creating a polarized county of industrial sacrifice zones and preserved enclaves.

15.

16.

17.

18. **Technology:**

19. The authorization of 168 diesel generators signals a regulatory weakness, allowing Frederick to become a haven for "dirty" backup power technologies that are increasingly unwelcome in Northern Virginia.

20.

21.

22.

23. **Health:**

24. The failure to couple industrial permitting with "Seal and Safe" retrofits for

**25. Carroll Manor Elementary**

**26. demonstrates a lag between economic ambition and public health responsibility.**

27.

Unless the county pivots to enforce stricter technology mandates (banning diesel), tightens the zoning cap to the existing footprint, and creates South-specific preservation mandates, the transformation of Adamstown into a high-density digital industrial corridor appears inevitable. The "Ashburn" label, therefore, serves as both a warning of what is to come and a description of what has already been approved.

People that have lived in Adamstown a long time have heard mention of 'Project Holiday,' tracing the root of the crisis we face today—the moment the county pivoted toward becoming a data center hub. The irony of that name is bitter; instead of enjoying a wonderful December filled with my usual traditions of baking dozens of cookies and shopping for my family, my days are now consumed by the fight to save our homes. As the Matriarch of the family and a grandmother of four, I constantly ask myself: Will my grandchildren be safe visiting me once these data centers are running? This is not the life I dreamed of when I moved to Adamstown. My fear is so real that I recently called Joshua Heebner with the fire department just to ask if we would have an evacuation route in the event of a data center fire. It is terrifying, and it is infuriating, to feel that our safety means so little to some of the people in charge. Feels to many of us like it's a "project holiday" again considering the time of the year it is. They make a final decision on December 23rd, 2 days before Christmas. This has to be a

joke right? Not funny.

Finally, we must ask: what will be the legacy of these politicians? They are turning Adamstown and South Frederick into a **TOXIC TOWN**. They should look to **Ashburn, Virginia**, where the political landscape has shifted dramatically. **In 2024, the Loudoun County Board of Supervisors—recognizing the damage done—voted to strip data centers of "by-right" development status**, effectively turning **anti-data centers** to protect their remaining quality of life. Our leaders are repeating the mistakes Ashburn is now frantically trying to correct. How can the CE and some of the CC's sleep at night **knowing they are selling out the health and heritage of South Frederick?**

Table : Summary of Key Grievances and Policy Mechanisms

Grievance	Policy Mechanism	Community Interpretation
Expansionism	CDI Overlay "Floating Zone" (4,200 acre cap)	Pre-approval of doubling the industrial footprint; "Spot zoning" vulnerability.
Preservation Inequity	"5-to-1" Ratio & Fee-in-Lieu	South County loses farms; North County gets the money/easements. "Sacrifice Zone."
Toxic Emissions	MDE Air Permits (168 Diesel Generators)	Importing "dirty" tech that Fairfax is rejecting; creating local ozone/PM2.5 hotspots.
Public Health Risk	Permitting adjacent to 1965 School	"Profit over Safety"; Failure to fund "Seal and Safe" retrofits for vulnerable children.
Political Betrayal	"Compromise" Legislation	Restricting "By-Right" access is meaningless if the "Overlay" approves 4,000+ acres anyway.

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