

From: Deborah Boots <debboots5@gmail.com>
Sent: Tuesday, December 9, 2025 7:16 PM
To: Council Members <CouncilMembers@FrederickCountyMD.gov>
Subject: VOTE NO ON EASTALCO DATA CENTER EXPANSION

[EXTERNAL EMAIL]

Our family does not live in the immediate area of proposed Eastalco data center, but we will be impacted. Frederick County is moving too rapidly toward covering the land to accommodate growth. This is the wrong way to go. And the data centers take land, water, electricity and produce constant noise and light, harmful toxins and lots of trivia data we do not need. Please do not expand the approved area with additional acreage and please! Do not consider ever approving any further industrial complexes such as this one. You are suppose to be serving the citizens of this county. We are monitoring your votes and will remember your position on this one issue in future elections when we get our chance to vote. Thank you. Clyde Boots at 5955 Quinn Orchard Road, Frederick.

From: Sherry Stephenson <sherry.stephenson@gmail.com>
Sent: Wednesday, December 10, 2025 11:01 PM
To: Council Members <CouncilMembers@FrederickCountyMD.gov>
Cc: sherry Stephenson <sherry.stephenson@gmail.com>
Subject: Questions to the Council Members about the expansion of the Eastalco Growth area for additional data centers

To Frederick County Council Members:

I am writing to you to express my opposition to the expansion of the Eastalco Growth area for the location of additional data centers. This is not a desirable course of action for several reasons and would be detrimental to Frederick County. I believe that expansion would create a radical change in the nature of Adamstown, Buckeystown, Point of Rocks, and rural southern Frederick County overall and bring about a change of life that would be disadvantageous to the county, its development, and its inhabitants.

I would be very keen to receive answers to the following key questions that this proposal for expansion raises in my mind:

- 1). What will the county gain in NET revenue from such a big increase in industrial activity, and how much would an expanded Eastalco Growth Area cost the taxpayers of Frederick County (i.e. myself and many others)? Is there a fiscal cost-benefit analysis that has been carried out, and could this be shared with the public? Without significant positive benefits, there is absolutely no justification for the destruction of the character of these beautiful areas in the county.
- 2). How can the expansion of the Eastalco Growth Area take place when the Data Centers Work Group recommended AGAINST THIS due to the destruction of the prime agricultural land that it would bring about, destroying almost 1,000 acres of farmland. Do you really think it is desirable for Frederick County to replace farmland with huge tracts of data centers that are ugly, do not generate significant employment, create environmental pollution, and deplete the County of its water. The land in question is either in the County Priority Preservation Area or the State Rural Legacy area, or BOTH. Current County regulations prohibit data centers in Priority Preservation or Rural Legacy areas. How can this even be under discussion?
- 3). Where will the HUGE amounts of power / electricity for the additional data centers going to come from? And what are the actual requirements for the power demands? How is it possible to envisage doubling the size of the data center zone without knowing these key variables. The state of Maryland is already a power importer.

More power lines will be needed if the expansion is approved. And crucially, the electricity costs of Maryland residents, especially those in Frederick County, will increase tremendously and in an unjustifiable manner.

4). Have the Council Members considered the environmental consequences of the expansion of the Eastalco Growth area for the location of additional data centers? Since the start of data center construction, more than 100 major environmental violations have been cited. The Eastalco complex has been given “Stop Work” orders and there are two ongoing Maryland Attorney General’s Office investigations. In view of these violations, does the Planning Commission think it's environmentally prudent to expand the CDI Overlay by another 1000 acres?

Thank you for taking these concerns seriously into account, and for responding to the questions that worry me and so many others. This should not be a rash decision, taken lightly, as the consequences for the County and its inhabitants will be permanent.

Sherry Stephenson
1320 Linthicum Road
Dickerson, Maryland 20842
sherry.stephenson@gmail.com

From: Elyse Wilson <elysewilsonkhk@gmail.com>
Sent: Wednesday, December 10, 2025 11:55 PM
To: Council Members <CouncilMembers@FrederickCountyMD.gov>; County Executive <CountyExecutive@FrederickCountyMD.gov>; Young, Brad <BYoung@FrederickCountyMD.gov>; Knapp, Renee <RKnapp@FrederickCountyMD.gov>; McKay, Steve <SMcKay@FrederickCountyMD.gov>; Donald, Jerry <JDonald@FrederickCountyMD.gov>; Carter, Mason <MCarter@FrederickCountyMD.gov>; Keegan-Ayer, MC <MCKeegan-Ayer@FrederickCountyMD.gov>; Duckett, Kavonte <KDuckett@FrederickCountyMD.gov>; Planning Commission <PlanningCommission@FrederickCountyMD.gov>; Venable, Victoria <VVenable@FrederickCountyMD.gov>
Subject: URGENT: Opposition to Expansion of the CDI Overlay Zone and Demand for Binding Green Standards in Adamstown Area

[EXTERNAL EMAIL]

Honorable Council Members,

I am writing to you today, as a concerned resident of the Adamstown area, to strongly oppose the expansion of the Critical Digital Infrastructure (CDI) Overlay Zone beyond the minimum boundaries necessary, and to demand that the associated zoning legislation be strengthened with **binding, measurable environmental commitments**.

It is completely irresponsible to expand the CDI Overlay Zone *at this time* without first ensuring that its regulations prevent the very sprawl and pollution we see one state away in Northern Virginia. The current political environment allows developers to skirt environmental accountability, and the County must use the CDI-OZ to close those loopholes immediately.

The Irresponsible Precedent: Why Expansion Must Wait for Enforcement

The primary argument for allowing data center development is that it can be done responsibly. However, the data proves that, without stronger local mandates, developers are not choosing the green path:

1. **Our Neighbors Prove Better is Available:** Just across the Potomac, leading developers like **Digital Realty** have publicly committed to and achieved **100% Carbon-Free Energy (CFE) coverage** for their entire North American colocation portfolio, with the regional facilities near us running at 90% green power *by year's end*. If an industry leader can meet this standard in Virginia, Frederick County has zero justification to accept anything less than **100% CFE for any development in Adamstown**.

2. **The State Validated Our Pollution Concerns:** When **Aligned Data Centers** attempted to install 168 diesel generators, the **Maryland Public Service Commission (PSC)** denied the **request** on environmental grounds. This was a clear validation of the community's argument that "old and dirty" diesel backup power is unacceptable in Frederick County.
3. **The Legislative Loophole Undermines County Authority:** The passage of **State Bill SB474** in 2024 legislatively overruled the PSC's environmental judgment, creating a loophole that allows developers like Rowan and Aligned to move forward with the very diesel generator pollution the County initially resisted.

Our Demands: Strengthen the CDI-OZ Now

To prevent the **Quantum Frederick** campus from becoming a high-carbon, high-polluting source that burdens our electrical grid and water supply—and to prevent irresponsible expansion of the CDI-OZ—the County Council must mandate the following binding requirements:

Demand	Justification
1. Mandate 100% Carbon-Free Energy (CFE)	Binding Requirement: The facility must demonstrate verified sourcing for 100% of its energy from carbon-free sources, aligning with the Maryland Climate Solutions Now Act and the 90% standard proven next door .
2. Prohibit Fossil Fuel Backup	Binding Requirement: Explicitly prohibit the use of diesel or natural gas generators for backup. The facility must deploy non-polluting alternatives like advanced battery storage or green hydrogen fuel cells, thereby closing the loophole created by SB474.
3. Enforce Water Efficiency	Binding Requirement: Prohibit the use of potable (drinking) water for cooling. Mandate the exclusive use of treated effluent ("gray water") or water-free cooling systems, as recommended by the County's own Data Center Workgroup.
4. Cap Energy Inefficiency	Binding Requirement: Mandate a maximum Power Usage Effectiveness (PUE) score of 1.2 or lower, as recommended by the County's Data Center Workgroup, ensuring the absolute highest level of energy efficiency.

Conclusion

Frederick County Executive Fitzwater has rightly stated that she does not want us to become the next Northern Virginia. Yet, by expanding the CDI Overlay Zone without first securing these legally binding, measurable environmental standards, the County is essentially subsidizing an outdated, high-carbon model of development through tax incentives and a state-level pollution loophole.

I urge you to halt the expansion of the CDI-OZ and amend the associated zoning regulations to include the above mandatory green standards before any further development is approved.

Respectfully,

Elyse Wilson

Adamstown MD

From: Kyle Wilson <kylewilson2799@gmail.com>
Sent: Thursday, December 11, 2025 12:32 AM
To: Council Members <CouncilMembers@FrederickCountyMD.gov>; County Executive <CountyExecutive@FrederickCountyMD.gov>; Keegan-Ayer, MC <MCKeegan-Ayer@FrederickCountyMD.gov>; McKay, Steve <SMcKay@FrederickCountyMD.gov>; Duckett, Kavonte <KDuckett@FrederickCountyMD.gov>; Young, Brad <BYoung@FrederickCountyMD.gov>; Donald, Jerry <JDonald@FrederickCountyMD.gov>; Carter, Mason <MCarter@FrederickCountyMD.gov>; Knapp, Renee <RKnapp@FrederickCountyMD.gov>
Subject: CDI Overlay Zone Must Protect Our Land: The Permanent Environmental Scars of Diesel Generators

Council Members,

I am writing to you today, as you deliberate the Critical Digital Infrastructure (CDI) Overlay Zone, to demand you look beyond short-term tax revenue and reject the **permanent environmental degradation** that reliance on thousands of diesel generators will inflict on Adamstown and the entirety of Frederick County.

The proposed development is not merely a collection of buildings; it is a permanent change to the land that violates the long-term stewardship Frederick County owes its residents.

The Permanent Scars on Our Land, Air, and Water

The reliance on fossil-fuel backup systems and the massive scale of the Quantum Frederick campus pose three permanent threats to our land:

1. **Permanent Air and Soil Contamination:** The aggregated exhaust from thousands of generators (even if run only for testing) releases **Nitrogen Oxides** (NO_x) and **Particulate Matter** ($PM_{2.5}$). This leads to **acid deposition**, permanently changing soil chemistry, harming forests and local crops, and contaminating the soil with heavy metals.
2. **Permanent Water and Groundwater Contamination Risk:** The project requires storing tens of thousands of gallons of toxic diesel fuel on-site. The risk of a catastrophic spill—during delivery or transfer—is multiplied by the project's scale, leading to **long-term, expensive, and potentially permanent contamination** of our local aquifers and tributaries feeding the Potomac River.
3. **Permanent Loss of Ecological Land:** Converting 1,600 acres to impermeable industrial concrete and steel permanently removes productive land, drastically increasing stormwater runoff, which causes **increased flooding and erosion** that permanently alters local hydrology.

The Solution is Immediately Available and Financially Viable

The use of diesel is not a necessity; it is a choice to use the cheapest, dirtiest technology. Green alternatives are proven, scalable, and deployed by this very industry in neighboring regions:

Problem: Polluting Backup	Proven Solution: Hybrid Clean Power	Operational Benefit
Diesel Generators (Air pollution, noise, fuel spill risk)	Battery Energy Storage Systems (BESS): Silent, zero-emission, instantaneous power for short outages and peak shaving.	Cost savings on peak demand and superior reliability (instantaneous switchover vs. 15-second diesel ramp-up).
Long-Run Diesel (Needed for multi-day outages)	Green Hydrogen Fuel Cells: Zero-emission power source whose only byproduct is water and heat. Can be fueled for long-term backup (48+ hours) without combustion.	Future-proof against tightening emission regulations and completely eliminates on-site air pollution.

Our Demand: Choose the Green Standard Over Permanent Degradation

The **Frederick County Council** must use the CDI Overlay Zone to mandate these proven solutions. We must not allow a state loophole (SB474) to force us to accept permanent environmental damage.

We demand you amend the CDI Overlay Zone immediately to:

1. **Mandate the use of non-polluting backup power** (BESS and Green Fuel Cells) to eliminate the permanent health and land risks associated with diesel.
2. **Mandate 100% Carbon-Free Energy (CFE)** to protect our air and climate.

We implore you not to place a permanent environmental scar on Frederick County. The long-term cost of remediation for polluted air, soil, and water will be borne by residents for generations to come.

Respectfully,

Kyle Wilson

Adamstown MD

From: K and E Stephens <kandestephens@gmail.com>
Sent: Thursday, December 11, 2025 12:17 AM
To: Council Members <CouncilMembers@FrederickCountyMD.gov>; McKay, Steve <SMcKay@FrederickCountyMD.gov>; Donald, Jerry <JDonald@FrederickCountyMD.gov>; Keegan-Ayer, MC <MCKeegan-Ayer@FrederickCountyMD.gov>; Carter, Mason <MCarter@FrederickCountyMD.gov>; Young, Brad <BYoung@FrederickCountyMD.gov>; Knapp, Renee <RKnapp@FrederickCountyMD.gov>; Duckett, Kavonte <KDuckett@FrederickCountyMD.gov>
Cc: County Executive <CountyExecutive@FrederickCountyMD.gov>; Planning Commission <PlanningCommission@FrederickCountyMD.gov>
Subject: IMMEDIATE ACTION REQUIRED: Amend CDI Overlay Zone to BAN Diesel Generators and Mandate 100% Green Power

To County Council,

I am writing to you today—just five days before the critical **December 16th Public Hearing on the CDI Overlay Zone**—to demand that you use your local authority to stop the construction of thousands of polluting diesel generators in Frederick County.

The fact is that the most damaging part of the data center expansion, the backup power, is **not yet fully permitted**. We still have the power to stop the diesel path now, and it is a moral and environmental imperative that you do so.

The Irresponsibility of Choosing Diesel Over Green

It is completely indefensible and irresponsible for Frederick County to accept diesel generators when our regional neighbors are already proving that clean alternatives are immediately available:

1. **Green Alternatives Are Proven Next Door:** In Chantilly, VA (only a state away), industry leaders like **Digital Realty** are achieving **100% Carbon-Free Energy (CFE) coverage** and publicly committing to operate at this standard. This proves that high-capacity data centers are compatible with a completely clean power supply.
2. **Clean Backup is Available in Maryland:** Nearby in Montgomery County, developers are actively pursuing advanced battery storage and fuel cell technology for reliable backup power, eliminating the need for polluting diesel.
3. **The State Validated Our Concern:** The PSC initially **denied** a massive generator request by Aligned Data Centers in Frederick County, affirming the community's position that this level of pollution is unacceptable. The subsequent state law (SB474) did not make diesel cleaner; it simply removed the state regulator's power to stop the developers.

Our Demand: Use the CDI-OZ to Ban Diesel Now

As a County Council, you are the last line of defense. The CDI Overlay Zone must be amended immediately to include the following binding language before a single additional permit is issued:

1. **Ban Fossil Fuel Backup:** The CDI Overlay Zone **must explicitly prohibit the construction or operation of any new diesel, natural gas, or fossil fuel-powered backup generators** within the zone. This is a non-negotiable step to protect the air quality and public health of our community, especially those near schools.
2. **Mandate 100% Clean Energy:** All facilities within the CDI-OZ must be bound by contract to source **100% verifiable Carbon-Free Energy (CFE)** for all operational load, matching the standard already achieved by their peers next door.
3. **Link Tax Incentives to Clean Energy:** The County must tie all development tax incentives to the achievement and maintenance of the 100% CFE and no-diesel standards. If they choose pollution, they forfeit our tax support.

We urge you to take courageous and decisive action at the upcoming December 16th Public Hearing. Do not allow Frederick County to become the dumping ground for outdated, polluting technology that is already being phased out by developers operating in adjacent markets.

We ask you to stand with the residents and environmental health of Frederick County.

Respectfully,

Ken Stephens

Adamstown MD

From: Adamstown Resident <residentadamstown@gmail.com>
Sent: Thursday, December 11, 2025 12:45 AM
To: Council Members <CouncilMembers@FrederickCountyMD.gov>; Planning Commission <PlanningCommission@FrederickCountyMD.gov>; County Executive <CountyExecutive@FrederickCountyMD.gov>; Young, Brad <BYoung@FrederickCountyMD.gov>; McKay, Steve <SMcKay@FrederickCountyMD.gov>; Duckett, Kavonte <KDuckett@FrederickCountyMD.gov>; Donald, Jerry <JDonald@FrederickCountyMD.gov>; Knapp, Renee <RKnapp@FrederickCountyMD.gov>; Carter, Mason <MCarter@FrederickCountyMD.gov>; Keegan-Ayer, MC <MCKeegan-Ayer@FrederickCountyMD.gov>
Subject: ETHICAL MANDATE for December 16th CDI Vote: Is a Temporary Construction Job Worth Permanently Poisoning Thousands of Citizens?

Honorable County Executive Fitzwater and Members of the Frederick County Council,
We are writing with urgency ahead of the December 16th Public Hearing on the CDI Overlay Zone to address the central ethical failure of the current data center plan: **the reliance on thousands of polluting diesel generators.**

The MDE is currently reviewing permits for just the first wave of these machines. If approved, the Council will have permitted an environmental hazard that will permanently compromise the health of thousands of Frederick County citizens, including children at Carroll Manor Elementary.

The False Trade-Off: Temporary Jobs vs. Permanent Pollution

We are being sold a false choice: accepting **temporary construction jobs** in exchange for a **permanent health hazard**.

1. **Permanent Pollution:** The combustion of diesel releases massive amounts of NO_x and $\text{PM}_{2.5}$. This toxic exhaust is not a temporary nuisance; it is a permanent threat that leads to lifelong respiratory and cardiac illness, soil contamination, and an increased flood/spill risk from diesel storage.
2. **Temporary Gain:** The construction jobs touted by developers and lobbyists (including the IBEW) are time-bound (1-3 years). This short-term economic benefit does **not** justify decades of pollution for the residents whose taxes are subsidizing these projects.

The Clean Solution: Mandate Union-Built Clean Energy

This must not be framed as an anti-union or anti-job issue. The solution is to mandate the creation of **better, safer, union jobs** that install and maintain modern infrastructure:

Current Problem (Dirty & Temporary)	Mandated Solution (Clean & Long-Term)
Polluting Diesel Generators	Battery Energy Storage Systems (BESS) and Green Hydrogen Fuel Cells.
Frederick's Current Standard	100% Carbon-Free Energy (CFE), as proven by the industry one state away (Digital Realty).

Our Demand: Use the CDI-OZ to Fulfill Your Ethical Duty

Given County Executive Fitzwater's commitment to worker welfare and the Council's duty to public health, we demand you use the CDI Overlay Zone to make the following binding conditions immediately enforceable:

1. **Ban Fossil Fuel Backup:** Explicitly **prohibit the construction or operation of all diesel or fossil-fuel generators** within the CDI Overlay Zone.
2. **Mandate Clean Labor:** Require that the installation and maintenance of the mandated **Battery Energy Storage Systems and Green Hydrogen Fuel Cells** be performed exclusively by high-wage, skilled **union labor**. This secures long-term clean jobs for Frederick County workers.
3. **Mandate 100% CFE:** Demand the facilities operate on **100% Carbon-Free Energy**—the standard already achieved by their peers.

Do not allow the pursuit of temporary construction revenue to saddle the citizens of Frederick County with permanent pollution and health consequences. We demand you vote to protect your constituents and the future of our land.

Respectfully,

Heather Wilson

Adamstown MD

From: Vicki <vickimichael@comcast.net>
Sent: Wednesday, December 10, 2025 3:34 PM
To: Council Members <CouncilMembers@FrederickCountyMD.gov>; Young, Brad <BYoung@FrederickCountyMD.gov>; Duckett, Kavonte <KDuckett@FrederickCountyMD.gov>; McKay, Steve <SMcKay@FrederickCountyMD.gov>; Donald, Jerry <JDonald@FrederickCountyMD.gov>; Carter, Mason <MCarter@FrederickCountyMD.gov>; Knapp, Renee <RKnapp@FrederickCountyMD.gov>; Keegan-Ayer, MC <MCKeegan-Ayer@FrederickCountyMD.gov>
Cc: Elizabeth Bauer <cdnlizard@gmail.com>; Mary Beam <beamery@comcast.net>; William Beam <billbeam4th@gmail.com>; Peter Michael <phmichael@comcast.net>; Steve Black <steveblack2313@gmail.com>; Gene Butler <rollbackfarmer@comcast.net>; Steve Cassis <steve.cassis@ymail.com>; Jennifer Charlton <Jennifer@charltoncommunications.com>; Tony Checchia <tonylchecchia@gmail.com>; Joseph Clark <csandenterprisesllc@gmail.com>; Angela Cook <dogmom65412@gmail.com>; Dale Franklin <dale.franklin@yahoo.com>; Sarah Gilbert <gillie111@gmail.com>; Rachel Hornyak <rachel.frymark@gmail.com>; Santa Hsu <santahsu@comcast.net>; Beth Jeffers <bjeffers511@comcast.net>; Elizabeth Law <bettybob1758@gmail.com>; Jack Le <jackqle@hotmail.com>; Kelly Le <kellyod518@aol.com>; Abby Mann <abbs0411@gmail.com>; Steve Poteat <cspoteat@gmail.com>; Responsible Growth Frederick <responsiblegrowthfrederick@gmail.com>; Carl Rosey <croseycool@gmail.com>; Judy Rosey <jprosey@hotmail.com>; Eric Schaub <Eschaub101@aol.com>; Brian Sweeney <briansweeney8911@gmail.com>; Tom Vaughan <ctv1027@gmail.com>; William West <wsrkwest@gmail.com>; Zoning Group 1 <whitesands12@gmail.com>; Zoning Group 2 <vicki07@hotmail.com>; Judy Rosey <jprosey@hotmail.com>
Subject: Vote NO to rezone Southern Frederick County agricultural property to industrial use

Dear Council Members, Neighbors, and Friends,

My husband and I own Cooling Springs Farm at 2455 Ballenger Creek Pike in Adamstown, Maryland. We have lived here for 22 years after moving from California to bring the property back into the Michael family. The farm was first explored in 1704, then founded in 1768, and our current farmhouse was built in 1879. The property is listed in the Maryland Inventory of Historic Places, as well as a Frederick County Landmark, and was a site on the Underground Railroad during the Civil War. We donated a conservation easement to the Maryland Environmental Trust so that it can never be developed or the home altered. The property lies within a large Maryland Priority Preservation Area, legally designated to remain rural and permanently zoned for agriculture and other strictly pastoral uses.

We moved here because we loved the character and architecture of downtown Frederick, the arts and culture of the community, the beautiful surroundings of the rural countryside, and the friendly residents. Now we are heartbroken to witness an endless sea of monstrous concrete, windowless, square boxes being built one mile from our home. To make things worse, the thought of a possible rezoning of agricultural properties to heavy industry is like a living nightmare. We live 40 feet (yes, that's FEET) from one of the properties in the overlay scenario proposed by the data center developers. I never imagined or hoped that one day I would be living in an industrial area. You can prevent this outrage by your vote against the conversion of agricultural property to industrial use. Please do so to protect your constituents from harm and anguish, which is your job. Once this farmland is gone, it would be gone forever.

Besides destroying the precious and valuable agricultural land around us, the air quality, noise levels, traffic, light pollution, and much more, it would seem that the valuable tourism industry

here would also take a hit. Frederick prides itself on its strength in the tourism industry. Of course, visitors love the downtown area with nice shops and restaurants. What will happen when they venture outside the City of Frederick? What will happen to the cyclists and motorcyclists that frequent the curving roads and hills in our community. Will they meet head-on with an enormous truck moving a gigantic battery or have the delightful view of a battery storage site or sewage treatment plant? I think they would choose a different route. Don't you? Too bad for Frederick County.

It is said that by destroying our 1% of the county's farmland that 99% of the county's farmland will be spared from this disamenity of data centers. Everyone will gain except us. Destroy one of our acres and you get to have five of your acres protected. That's mighty gracious of us, don't you think? How about reimbursing us for the losses we would take on our real estate values and giving us a lifetime permanent real estate and county tax exemption? On top of that, we would most likely be forced to convert our pastures here at Cooling Springs Farm to forest land to block the views, sounds, lights, noise, and pollution of any development near us. Maybe we would build a wall. We would like to be reimbursed for those expenses as well. The idea being promoted by the Data Center Alliance of Maryland that "Concentration Prevents Proliferation" is disproven by the very fact that the Eastalco site isn't even completed yet, and there is already the need for an Overlay Zone to grow and proliferate further. Concentration actually triggers proliferation by exhausting local ecological capacity. When large clusters of data centers are built in one region, they create intense localized pressures such as extreme electricity demand, competition for limited renewable energy, heavy water consumption for cooling, and heat-island effects. These stresses soon make the region unsustainable as a sole hub, forcing companies to build additional data centers in other regions to secure energy, cooling, and grid stability. Bottom Line: Concentration doesn't prevent proliferation, it **drives** it. I found the flyer mailed to us by the Data Center Alliance of Maryland to be offensive and insulting.

I thank you for your continued service to the community and for seriously understanding the concerns and welfare of your constituents who value thoughtful, sustainable development. Again, please refrain from harming your constituents and vote AGAINST the proposed overlay zone and the rezoning of agricultural property to industrial use.

Very truly yours,

Vicki Michael

Cooling Springs Farm

On the Underground Railroad

2455 Ballenger Creek Pike

Adamstown, MD 21710

240-344-6558

vickimichael@comcast.net

From: Elizabeth Law <bettybob1758@gmail.com>
Sent: Wednesday, December 10, 2025 4:49 PM
To: Council Members <CouncilMembers@FrederickCountyMD.gov>; County Executive <CountyExecutive@FrederickCountyMD.gov>; Planning Commission <PlanningCommission@FrederickCountyMD.gov>
Cc: Murray, Patrick <PMurray@FrederickCountyMD.gov>; Victoria Venable <vvenable216@gmail.com>; Wilkins, Michael <MWilkins@FrederickCountyMD.gov>; Katie Nash <knash@cityoffrederickmd.gov>; Michael OConnor <moconnor@cityoffrederickmd.gov>; Sarah Hempel Irani <hello@sarahforfrederick.com>; Libby Taylor <libby.kari@gmail.com>; cesardiaz@protonmail.com; Scott Lasher <scott.lasher@yahoo.com>; Derek Shackelford <dshackelford@cityoffrederickmd.gov>; pbrehm <pbrehm@comcast.net>
Subject: Public Comments Re: County CDI Zone- Upcoming FERC Order on Large Loads

Council Members,

Please see below my comments, a summary of the discussions taking place at the Federal Energy Regulatory Commission (FERC) with utility stakeholders and the Independent Market Monitor. I am providing this to inform your decision on Dec. 23 as to how large the Adamstown Quantum Frederick site should be. This will be particularly true for Maryland, which already imports 40 % of its power.

FERC is dealing with the need for a response to the unprecedented cost increased of electricity for the consumer. The news is rife with stories of ALICE folks who now need to choose between food, rent and electricity bills. The source of this increased cost has been the rapacious power demands of hyperscale data centers.

The questions at FERC are how will the nation provide electric power for hyperscale datacenters and who will pay for the infrastructure such as transmission lines, large generators? The decision will affect all communities who are dealing with data center growth.

FERC is considering having the data centers themselves foot the bill for the transmission lines and generators they will require, rather than have the cost amortized among all ratepayers. It will take time for FERC to come to a decision and to institute procedures, rules and orders for the utilities and Regional Transmission Operators like PJM to follow. It will take time for states and communities and even the MD Tech Council Lobby to determine what this will mean.

In the meantime this will have a dampening effect on data center growth.

During this time of such economic uncertainty as to who will pay the enormous cost of electricity - which will serve primarily the data center industry,

it behooves the Council to limit the area of the Adamstown Quantum Fredrick site to its present size. How can you jump into data center sprawl when you don't know the cost effect?

Thank you,

Betty Law

Chair,

Fellowship of Scientists and Engineers

From <https://www.csis.org/analysis/whats-stake-fercs-large-load-proposal>

What's at Stake in FERC's Large Load Proposal?

Critical Questions by [Aaron Yang](#), [Ray Cai](#), [Joseph Majkut](#), and [Mathias Zacarias](#)

Published December 9, 2025

A new Federal Energy Regulatory Commission (FERC) order could determine whether the U.S. grid can scale quickly and responsibly enough to meet AI-driven demand.

In an assertive use of its authority, the Department of Energy [directed](#) FERC on October 23 to initiate a rulemaking (Docket [No. RM26-4-000](#)) to standardize how large loads—those over 20 megawatts (MW)—and colocation facilities interconnect to the transmission system. In its Advance Notice of Proposed Rulemaking (ANOPR), FERC grounded its proposal in its authority over transmission facilities, wholesale markets, and practices affecting wholesale rates under Section 201(b) of the Federal Power Act.

Responding to the ANOPR, utilities, data center developers, power producers, and state regulators submitted comments to FERC. This analysis draws upon aggregated comments

and issue tracking provided by [Halcyon](#), as well as a review of representative filings. These materials highlight the key questions that FERC must resolve before its April 30, 2026, deadline for a final rulemaking. Hyperlinks in this brief point to sample comments.

FERC's decision will set an important precedent for how regulators handle hybrid interconnections and, more broadly, how they integrate new load onto an already constrained grid.

Q1: What counts as a “large load?”

A1: Responses broadly reflect two distinct viewpoints: stakeholders comfortable with the proposed 20 MW floor, and those arguing for a higher threshold—often 50, 75, 100 MW or even 200–300 MW. For context, 20 MW is roughly enough to [power](#) 16,500 homes or a large university campus [such](#) as Louisiana State University. Supporters [argue](#) that the 20 MW threshold, aligned with FERC's existing generator interconnection procedure, would create a coherent regulatory framework for any customer large enough to affect the transmission system materially.

What once qualified as a “large load” at 20–30 MW now appears modest in a landscape where developments increasingly [push](#) into the hundreds of megawatts. Critics [warn](#) that 20 MW would [sweep](#) in midsized manufacturers and facilities traditionally served under state tariffs, effectively federalizing retail matters. Many stakeholders instead converge around 50–100 MW as a more practical threshold for federal involvement, noting that today's system-shaping data centers routinely [exceed](#) 200–300 MW.

Q2: How far does FERC's authority extend over large loads?

A2: The commission argues that very large loads resemble generators in how they affect reliability and system costs, and should fall under federal oversight when they interconnect to the bulk power system. Adopting this interpretation would establish a more uniform national framework, but it has drawn legal and political [resistance](#) from states.

Stakeholder comments split into two groups: those who want to accelerate development and those who want to preserve existing regulatory authority. Developers and technology companies [favor](#) a stronger federal role to reduce friction, shorten timelines, and manage transmission system impacts that extend beyond state boundaries. In contrast, states and many utilities [oppose](#) the proposal, viewing it as a threat to their traditional authority over retail service, distribution, and resource planning.

Q3: Who pays to upgrade the grid to serve large loads?

A3: U.S. data centers drove a 22 percent increase in electricity demand in 2025 and [could](#) triple by 2030, making them one of the largest sources of load growth. Yet

national transmission studies show that the United States is [building](#) only a fraction of the high-capacity lines it needs each year. Because the grid cannot scale as fast as demand, policymakers now treat cost allocation not as a technical ratemaking issue but as a central question of who pays for grid expansion—and how fast it happens.

FERC's proposal adopts a 100 percent participant funding model that would require large load customers to pay the full cost of the network upgrades their projects trigger.

Supporters [argue](#) this follows the logic of cost causation: when a data center or industrial campus connects in a constrained pocket of the grid, it should pay for the transmission it requires.

This policy marks a sharp departure from the traditional socialized model, in which transmission upgrades are treated as shared infrastructure and recovered through regional transmission rates. Proponents [argue](#) this design reflects the physical and economic reality: Once built, transmission improves reliability, reduces congestion, and enables power flows for everyone. Industrial manufacturers such as steelmakers also [note](#) that while large technology firms may be able to absorb major interconnection costs, capital-intensive facilities such as electric arc furnace steel mills often cannot. At the same time, socializing costs [raises](#) the political risk that ratepayers will view higher electricity bills as subsidies for corporate expansions, especially in regions already struggling with affordability or reliability.

FERC itself acknowledged this tension in the ANOPR, asking whether a later crediting mechanism could offset network upgrade costs. In response, state commissions, utilities, and technology firms [proposed](#) an intermediate model: Large loads would fund [upgrades](#) upfront but receive partial refunds or credits if those facilities later delivered systemwide benefits.

Q4: What does “bring your own power” mean for hybrid projects?

A4: Stakeholders generally agree that hybrid projects—large loads paired with colocated generation or storage—should move through a single, coordinated interconnection process rather than be treated as separate facilities. The dispute lies over how to model them. Developers and technology companies argue that when a data center “brings its own power” (BYOP), studies should [measure](#) its net use of the grid based on injection and withdrawal rights. From their perspective, colocated generation [reduces](#) system impacts and should translate into lower upgrade costs and faster processing.

Utilities and grid operators reject that logic, arguing planners cannot assume on-site generation will always perform as promised. They therefore [insist](#) hybrid facilities be [studied](#) on a gross basis—using full load and generation assumptions—so the grid can

withstand contingencies when on-site power fails. Regardless of how hybrids are modeled, there is broad support for requiring physical protections—such as relays and control schemes—that prevent injections or withdrawals beyond approved limits.

Q5: Is load flexibility a real grid resource or regulatory fiction?

A5: Stakeholders broadly agree that flexible loads can help integrate new demand. The question is whether FERC treats that flexibility as a core resource or a secondary accommodation.

Recent studies suggest flexibility can materially reduce system stress and cost exposure—but only under strict conditions. Research from Camus, encoord, and Princeton University’s ZERO Lab [finds](#) that pairing flexible interconnection with BYOP can speed interconnection while limiting both system expansion and ratepayer exposure. Similarly, Duke University’s Nicholas Institute [reports](#) that enforcing load flexibility during a small number of critical hours can reduce both system stress and capacity requirements. Together, these studies frame load flexibility as a valuable planning tool, but not a substitute for transmission investment or reliability oversight. Its value depends on whether operators can observe it, enforce it, and incorporate it into planning.

Commenters disagree on how FERC should weigh that evidence. Some developers want FERC to offer expedited interconnection as an [incentive](#) to loads that agree to curtail, arguing controllable demand can ease congestion and defer network upgrades. Others—especially state commissions, consumer advocates, and utilities—[warn](#) that treating loads as dispatchable could [increase](#) reliability risks for ratepayers without strong safeguards. They [note](#) that most hyperscale data centers still operate as firm load, with limited willingness to curtail in practice—a point some technology firms, including Meta, [acknowledge](#). The North American Electric Reliability Corporation likewise [warns](#) that rapidly changing large loads can destabilize frequency and voltage and raise fault risks unless planners model them conservatively.

Aaron Yang is a research intern with the Energy Security and Climate Change Program at the Center for Strategic and International Studies (CSIS) in Washington, D.C. Ray Cai is an associate fellow in the Energy Security and Climate Change Program at CSIS. Joseph Majkut is director of the Energy Security and Climate Change Program at CSIS. Mathias Zacarias is an associate fellow and energy transitions fellow in the Energy Security and Climate Change Program at CSIS.

From: Judy Thompson <middletownlady@gmail.com>
Sent: Thursday, December 11, 2025 12:51 PM
To: Council Members <CouncilMembers@FrederickCountyMD.gov>; County Executive <CountyExecutive@FrederickCountyMD.gov>; Planning Commission <PlanningCommission@FrederickCountyMD.gov>
Subject: Against Data Center Expansion

Dear County Council Members, County Executive Fitzwater, and Planning Commission Members,

Since summer 2026, I believe it is, I've been emailing the Council regarding the proposed data centers. During the same time, I've consistently requested that the Council reject expansion of the data center area. My main complaint has been that the Council didn't honor the recommendation of the work group and support a year's study of the ramifications of data center development on Frederick County.

I also attended one of the Winchester Hall hearings but didn't speak.

My secondary complaint is that data centers are purported to run up electricity bills of everyone in the county. My electricity bill is already double what it was this time last year. I'm sure I'm not alone in this.

I am pleased with the insightful recommendations of Frederick County's Planning Commission. The justification provided for their decision is comprehensive and exemplary.

I'm not happy that the Council chose to schedule workshops, hearings and votes at this busiest time of year. Is the Council trying to eliminate public input and quash thoughtful amendments by its members?

To repeat, please vote against expansion of the data center zone per the Planning Commission's recommendations.

To repeat, please schedule a study to examine the effects of data center development as recommended by the working group. Making decisions without the best available and current information is faulty governance.

I've also emailed and called my Maryland representatives, Senate President Bill Ferguson, Candidate for Speaker of the House Joseline Pena-Melnyk and the four members of my Maryland legislative district asking them to override the data center study bill veto in the upcoming session.

Finally, my thanks to Jerry Donald and Steve McKay for their votes on this issue.

Judy I. Thompson
Middletown MD

From: Theresa Furnari <tafurnari10@gmail.com>
Sent: Thursday, December 11, 2025 1:19 PM
To: Planning Commission <PlanningCommission@FrederickCountyMD.gov>; County Executive <CountyExecutive@FrederickCountyMD.gov>; Council Members <CouncilMembers@FrederickCountyMD.gov>
Subject: Do not expand the growth area

Good Afternoon: I just learned that the Data Center Study Bill that was vetoed by Governor Moore is on the docket for a veto override. It is critical that the county have objective information to determine the benefits and burdens of providing a venue for data centers. Thus I ask, if you would consider postponing your decision on the overlay zone until the vote is held for overriding the veto. I understand that there is a meeting on December 16 for members of the general assembly. By postponing your decision, you stand in the best position to have the relevant information before you for such an important decision. At present, I have only read reports by the tech council, which is not objective. There is nothing wrong with wanting to be well informed before you make a decision and I ask that you do so.

Additionally, it is no question that AI is driving the construction of data centers. However, I continue to read new reports challenging the use of AI. The most recent, was a case filed by the NYT and Chicago Tribune, challenging AI's use of the papers' news to compile its AI response. They should be paying for the information. But this is one of many challenges. As a result, I again ask, how much in demand will data centers be in the future with these challenges to AI and the changing technology of storing data.

Thank you.

Theresa Furnari

From: Annmarie Winkler <winklerah@yahoo.com>
Sent: Friday, December 12, 2025 9:32 AM
To: Council Members <CouncilMembers@FrederickCountyMD.gov>; County Executive <CountyExecutive@FrederickCountyMD.gov>; Planning Commission <PlanningCommission@FrederickCountyMD.gov>
Subject: NO OVERLAY/DATA CENTER EXPANSION! (AND NO TO DIESEL GENERATORS)

[EXTERNAL EMAIL]

Attention Council Members:

It's just been announced that more than 230 environmental groups are urging lawmakers to halt approvals and construction of new data centers amid what they describe as growing environmental and economic crises.

Should economic conditions in the tech sector sour, the burgeoning artificial intelligence boom may evaporate – and, with it, the economic activity associated with the boom in data center development and growth. Dept is playing an increasingly large role in the financing of data centers. In the end, this might not be that profitable for Frederick County and in the meantime, ruin the Adamstown infrastructure and landscape based on quick decisions.

Please deny the expansion of the data centers beyond the existing East Alcoa site, and seriously look at the impacts 99 diesel generators are on the neighboring communities, surround farms and residential areas, and our youth at Carroll Manor Elementary school.

Please DENY, DENY, DENY!

From: ER Benecke <erbenecke@gmail.com>
Sent: Saturday, December 13, 2025 9:32 AM
To: Council Members <CouncilMembers@FrederickCountyMD.gov>
Subject: CDI Overlay Zone Map Public Hearing Tuesday, December 16, 2025

[EXTERNAL EMAIL]

Frederick County Council,

I request that the Council vote to approve the map recommended by the Frederick County Planning Commission limiting the Overlay Zone Map to the "existing Quantum Frederick data center campus that already has site and preliminary plan approval and areas known as the Noffsinger and Windridge properties, east of Cap Stine Road" and not to approve the Overlay Zone expansion map presented by the county administration and staff that would double the area already approved for data centers at Eastalco, with insufficient objective information on how the first wave of hyperscale data centers will affect the local environment and the Frederick County community.

Thank you.

Eileen Benecke

Frederick, Maryland

From: Elyse Wilson <elysewilsonkhk@gmail.com>
Sent: Thursday, December 11, 2025 3:14 PM
To: McKay, Steve <SMcKay@FrederickCountyMD.gov>; Donald, Jerry <JDonald@FrederickCountyMD.gov>; Luna, Nancy <NLuna@FrederickCountyMD.gov>; Duckett, Kavonte <KDuckett@FrederickCountyMD.gov>; Carter, Mason <MCarter@FrederickCountyMD.gov>
Cc: STEVE MCKAY <stevemckay@comcast.net>; Council Members <CouncilMembers@FrederickCountyMD.gov>; County Executive <CountyExecutive@FrederickCountyMD.gov>; Planning Commission <PlanningCommission@FrederickCountyMD.gov>; Venable, Victoria <VVenable@FrederickCountyMD.gov>
Subject: URGENT ACTION REQUIRED Before Dec 23rd VOTE: The Council Must Use CDI-OZ to Ban Diesel Generators and Mandate Clean Tech

[EXTERNAL EMAIL]

Honorable County Executive Fitzwater and Members of the Frederick County Council,

As a resident of Adamstown, I write to underscore the most critical decision before you: **Your vote on the CDI Overlay Zone (CDI-OZ) on December 23rd will determine if over 1,000 polluting diesel generators are allowed to permanently poison our community.**

We demand that the Council use the CDI-OZ to impose new, higher standards that retroactively apply to all unfinished projects.

I. The Council's Absolute Legal Power to Intervene Now

Do not let developers claim your hands are tied. The Council absolutely retains the legal and zoning authority to stop this pollution, particularly because the **full pollution package (the 1,000+ diesel generators) is NOT yet vested or fully permitted.**

Legal/Political Lever	The Council's Authority
Zoning Amendment (CDI-OZ)	You can pass an amendment to the CDI-OZ on December 23rd that imposes new restrictions on specific uses based on public health and safety.
Site Plan Loophole	The vast majority of generators are still pending Building Permits . You have the power to pass a bill that immediately halts the issuance of any further Building Permits for fossil fuel backup systems within the CDI-OZ.
Maryland Land Use Authority	State law empowers you to impose restrictions "to preserve, enhance, or protect the general character" of the land—a direct justification against air pollution.

[Export to Sheets](#)

II. The Ethical Imperative: Ban Pollution, Mandate Clean Jobs

You face a false choice. The solution is not to eliminate jobs, but to **mandate cleaner, safer, long-term union jobs**.

- **The Diesel Lie:** The construction jobs are temporary (1-3 years). The pollution from diesel generators is **permanent** (20+ years of toxic NOx and PM2.5 emissions) that permanently threatens the health of our children near Carroll Manor Elementary.
- **The Clean Mandate:** The Council must mandate the use of zero-emission alternatives that are proven and commercially available: **Battery Energy Storage Systems (BESS) and Green Hydrogen Fuel Cells**. This provides the IBEW with the highly skilled, long-term clean energy installation and maintenance jobs they seek, without sacrificing community health.

III. The Binding Mandates We Demand Before December 23rd

We demand that the Council amend the CDI-OZ with the following two legally binding conditions:

A. Mandate the Diesel Ban and Clean Substitution

"Notwithstanding any prior site plan or conditional approval, the issuance of any new Building Permit or Occupancy Permit for any fossil-fuel-fired emergency power generator in the CDI Overlay Zone is hereby PROHIBITED. The developer shall substitute the previously planned fossil fuel backup systems with an equivalent capacity of Battery Energy Storage Systems (BESS) and/or Green Hydrogen Fuel Cells."

B. Mandate the 100% Green Power Source

"All data center facilities within the CDI Overlay Zone must achieve and maintain 100% verifiable Carbon-Free Energy (CFE) for all operational load, meeting the standard already set by industry leaders one state away."

Do not allow the loophole of SB474 to condemn Frederick County to decades of irreversible pollution. Your vote on December 23rd must uphold your duty to public health over a developer's short-term profit.

Sincerely,

Elyse Wilson

From: Mary Dague <mhdague@gmail.com>
Sent: Friday, December 12, 2025 6:52 PM
To: Council Members <CouncilMembers@FrederickCountyMD.gov>
Cc: countyexecutive@frederickcounty.gov
Subject: Please Vote Against Amazon Warehouses

Just as Americans are guaranteed due process under law, the land we develop is subject to review by the people who live there.

Yet, Adamstown residents were given no prior notice of development of 1,600 acres the Council approved for construction of data center warehouses. This development has already destroyed fertile farmland, woodland and damaged well water systems. Yet, Council has never authorized any environmental, health or cost/benefit studies for the construction already in progress.

Now Amazon has applied for a license to place infrastructure on abutting acreage. I urge you to deny this license on the grounds that no environmental, health and cost/benefit studies have been performed on this land either.

Since Carroll Manor Elementary School is a significant neighbor to the Amazon property, costly and extensive remediation will be required before any warehouse is built. Has Council addressed this renovation cost to the County taxpayers? Has Council thought about the impact on children of living and attending school in a town filled with toxic emissions? Has Council sought the advice of epidemiologists about the health of all residents?

It's my belief that an individual or a class of people who are irredeemably harmed in the future can file suit against the County. It is in Council's interest, therefore, to order studies done before voting on a license for Amazon infrastructure.

Taxpayers are also voters. Council needs to answer these questions for Adamstown and all of Frederick County.

Mary Holmes Dague
3890 Point of Rocks Road
Jefferson, Maryland 21755

From: Lauren Foley <lfoley720@gmail.com>
Sent: Friday, December 12, 2025 6:51 PM
To: Council Members <CouncilMembers@FrederickCountyMD.gov>
Subject: Overlap map for data center

[EXTERNAL EMAIL]

I remain distressed reading the news these last few days - the article from the [Frederick News Post](#) citing that the Council will likely enact a data center overlay map near Adamstown. Despite the Planning Commissions vote to limit the overlay, and a public outcry against the development. The Planning Commission limits to the overlay are responsible, if we have to have data centers at all.

I recently enjoyed an afternoon visiting a bunch of antique shops at old barns and farms around Adamstown, Buckeystown, and the surrounding area. I took friends that were visiting for the Thanksgiving holiday and we happened to drive right by the Alcoa Eastalco site. I told them data centers were coming and they were all disgusted that would be the view instead of these rolling hills, old farms, and awesome places to visit. It's shameful - the statistics and info are out now: data centers do not add jobs, they only take from communities in terms of natural resources, quality of life, scenic views, and public health.

I can't understand why the council would make this move and I deeply regret that they will. I'm disappointed. We know so much from our neighbors in Virginia and we risk losing so much of what makes living here amazing. I hope my email is one of many that you receive in this issue.

Lauren Foley
Monrovia, MD



Outlook

CDI overlay bill

From David Burrier <burrierfarmsred@gmail.com>
Date Sun 12/14/2025 11:30 AM
To Council Members <CouncilMembers@FrederickCountyMD.gov>
Cc Belinda Burrier <burrierfarmsred@outlook.com>

[EXTERNAL EMAIL]

President Young, Vice President Duckett, and fellow council members,

Frederick County Farm Bureau supports the overlay recommendations by the Frederick County Planning Commission. Our concerns with the overlay bill remain with the boundaries of the State certified Priority Preservation Areas (PPI) which will require recertification of Fredrick County agricultural programs. These programs could come under review and reduce our percentage of transfer tax from 75% to 35%. It was stated by staff that this review will not affect our certification status , but in reality there is no indication by the State that this is true since it has not been tested until now. This is more critical to Frederick County Land Preservation than ever before since MALPF was greatly reduced last year to meet budget short falls. In preview, it looks like the tough financial climate will continue into this current fiscal year, which means there will be no reprieve of funds to support our State ag preservation efforts.

Also, any expansion of the industrial zoned land will challenge land that lies in the Rural Legacy Area. The Rural Legacy programs' goal is to protect and preserve large, contiguous tracts of rich agricultural land from sprawling development. Expansion of the existing industrial zoned land into these parcels will fragment the Rural Legacy Area. Since 2003, the Rural Legacy Area has protected the land, natural resources, history and view shed of Adamstown. Before this designation can be changed, it must be heard before the State board for Rural Legacy Preservation.

The land designated for the CDI overlay bill by the planning commission will give the county revenue to move planned projects and programs forward. Also, concerns regarding power and water sources will be more readily met. As this project moves forward in our county, please consider the consequences of Fredrick County losing its eligibility of revenue for our successful farmland preservation from the State agricultural transfer taxes. The Rural Legacy and the PPA areas were selected to maintain a large number of properties to protect these high quality soils that cannot be duplicated anywhere else in Frederick County. Fredrick County agriculture is currently challenged with many demands for farmland acres, and the loss of more preservation funds could limit our industry forever.

During the workshop two weeks ago, a council member made the statement that the council was flying the plane while they were building it. This statement is likely more correct than many other comments tonight, but should signal ere to caution as this moves forward. In conclusion Fredrick County Farm Bureau strongly urges the County Council to follow the recommendation of the planning commission.

Dave Burrier, President Frederick County Farm Bureau



Outlook

Data Center Development

From Giuseppe Savona <jdsavona@aol.com>

Date Sun 12/14/2025 11:39 AM

To Council Members <CouncilMembers@FrederickCountyMD.gov>

[EXTERNAL EMAIL]

Dear Council Members

I will keep my comments brief. Before expansion of agricultural lands to additional data center development, I believe the County should assess the emerging data center campus impacts on the County, environment, and its utilities (power, water etc) before it expands the area available for future development. I do not believe it's prudent to expand the area without understanding the effects of the existing or planned projects.

Secondly. I'm currently opposed to the MPRP power line which will run within 500 yards of my home. Do we have any idea what "MPRP 2" will aesthetically do to our County?

Lastly, regarding the Eastalco data center campus, it's estimated to generate \$215 million in annual county tax revenue once operational (40 percent of the County's annual property tax revenue). What is the Net benefit/cost?

Thank you in advance for your consideration

Joe Savona
Adamstown MD

Sent from my iPhone



Outlook

Data Center Overlay

From L R <romdiver@gmail.com>

Date Sun 12/14/2025 11:50 AM

To Council Members <CouncilMembers@FrederickCountyMD.gov>

[EXTERNAL EMAIL]

Dear Council Member:

Words are important. Remember these about the Data Center:

- CRITICAL: The Critical Data Infrastructure is not critical to any Frederick County resident;
- LOOPHOLE: The well-named Quantum Loophole is already polluting Frederick's water and air;
- LESS THAN 1% OF FREDERICK COUNTY: This "limits" data centers to about 7 square miles;
- ELECTIONS: Data centers can't vote in the next County Council Election...but we can.

New Design Road is the "line in the sand". Where do you stand?

L.D. Romane, M.D.



Dec 16 Hearing same as CMES Holiday Concert

From Elyse Wilson <elysewilsonkhk@gmail.com>

Date Sat 12/13/2025 10:44 PM

To Santa Hsu <Santahsu@comcast.net>

Cc Knapp, Renee <RKnapp@FrederickCountyMD.gov>; Young, Brad <BYoung@FrederickCountyMD.gov>; County Executive <CountyExecutive@FrederickCountyMD.gov>; Council Members <CouncilMembers@FrederickCountyMD.gov>; Donald, Jerry <JDonald@FrederickCountyMD.gov>; McKay, Steve <SMcKay@FrederickCountyMD.gov>; Keegan-Ayer, MC <MCKeegan-Ayer@FrederickCountyMD.gov>; Duckett, Kavonte <KDuckett@FrederickCountyMD.gov>; Carter, Mason <MCarter@FrederickCountyMD.gov>; Amy And Sten Olsson <olssons@gmail.com>; Angie Cook <Dogmom65412@gmail.com>; Billy Beam <billbeam4th@gmail.com>; Brian Sweeney <briansweeney8911@gmail.com>; Carl Rosey <croseycool@gmail.com>; Dale Franklin <dale.franklin@yahoo.com>; Eric Schaub <Eschaub101@aol.com>; Jack Le <Jackqle@hotmail.com>; Jason Norris <jason_norris301@hotmail.com>; John Laura Noffsinger <Rymer67@msn.com>; Joseph Clark <csanddenterprisesllc@gmail.com>

[EXTERNAL EMAIL]

Dear Frederick County Council and Jessica Fitzwater,

I recently learned from a parent that the Carroll Manor Elementary School (CMES) Holiday Concert is scheduled for December 16th, the exact same evening as the final public hearing regarding the proposed data center.

This scheduling conflict is highly concerning because CMES is the school most significantly affected by the proposed development, which includes 15 Data Centers located behind it ! You all are aware the closest Data Center to this elementary school is only 1974 feet away. Parents and grandparents must now choose between attending a key school event and participating in a critical public hearing that directly impacts their children's learning environment and health.

Whether intentional or not, setting the final public hearing on the same night as the CMES Holiday Concert effectively excludes the most affected residents—CMES parents and teachers—from providing crucial input. The school event had this scheduled over three months ago and it has been on their schedule!

Therefore, I strongly request that no final decision be made on this matter until the CMES parents and teachers have had the opportunity to attend the last Public hearing they were promised , given that this issue affects them more than any other school in Frederick County, MD. You should have checked the CMES Schedule since they are the ONLY affected School.

The parents I spoke to are angry. Holiday Season and during the CMES Holiday Concert. 😠

Sincerely,

Elyse Wilson

Cc The Broader Adamstown and South Frederick Community plus this will be posted to all social media outlets.

On Sat, Dec 13, 2025 at 6:44 PM Santa Hsu <santahsu@comcast.net> wrote:

Good evening,

I grew up in Buckeystown, in fact my mother still resides there, in the very same house. I attended Carroll Manor Elementary School and for the last 23 years I have resided on East Basford Road. Over the years I watched things change in Frederick County, some good and some not.

I remember when they were building Eastalco. I thought how sad that all that beautiful land was going to become a aluminum industrial plant. Eastalco basically built their plant in the center of the property, planted trees, put up buffers and stayed away from the local residents homes. They provided jobs, paid a decent wage, offered benefits and a retirement package. It provided a good life for mostly local residents and many were able to retire comfortably.

Things changed. The former Eastalco is now Quantum Frederick or Quantum Maryland, the name depends on if you're talking to a developer or a resident. Enormous, tall, ugly concrete data centers are being built, almost right up to residential property lines. You can see these monstrosities from any of the roads that surround the property and more are being constructed .

When the data center is completed and the construction workers are gone, very few people will be employed there and most will not be local. Let's not forget about the massive number of diesel fueled, polluting generators and all the diesel fuel that will be stored on site. There are still over 550 acres that are available to be built on at the original site. An overlay to add more acreage to build more data centers just seems like greed at this point.

There are enough valid and serious

concerns with the original approved data center site that no overlay should even be considered at this time.

6 miles down the road from Quantum, heading south west on Ballenger Creek Pike you will see beautiful rolling farmland, cornfields, soybean fields, an abundance of wildlife, breathtaking sunsets and skies so clear at night you cannot count all the stars.

On February 21, 2023, The Suzanne Family Irrevocable Trust purchased the properties at [2404 & 2518 Ballenger Creek Pike, Adamstown](#), totaling approximately 257 acres for the sole purpose of building a data center. The realtor, MacRo, clearly advertised that the property was in a Priority Preservation Area and in the Carrollton Manor Rural Legacy Area Program. MacRo even listed a full page of land uses that being in the PPA would allow. Data centers, Microgrids, battery storage, solar arrays and 30 million dollars worth of an EV fleet were not on that list.

A little bit about the property at [2404 & 2518 Ballenger Creek Pike, Adamstown](#) and the surrounding area:

The Suzanne property's 257 acres has never been anything but a working crop farm. 69.3% of the soil on the property site is identified as Prime Farmland and Farmland of Statewide Importance.

The Suzanne property is not consistent with the 2012 Comprehensive Plan nor is it in the Eastalco Growth Area or the Adamstown Community Growth Area.

There is no public water or sewer and per Frederick County, none is planned.

On the Suzanne property there are two creeks that run completely across the property. The creeks both flow into the Tuscarora Creek, which is a tributary of the Potomac River. The upper creek on the Suzanne site is fed from the creek on the James Cook property, located on East Basford Road. The Cook's portion of the creek is enrolled in the Maryland Conservation Reserve Enhancement Permanent Easement Program. I doubt the State of Maryland invested their resources to plant native vegetation and put in erosion barriers in order to protect the creek only to have it run onto the Suzanne property and become polluted with industrial debris and chemicals that will end up in the Potomac River. There is also a portion of the Suzanne property that is in a FEMA Floodplain, located from the upper stream to the lower stream.

Near the center of the Suzanne property is a private Johnson family cemetery :

Thomas Johnson II: August 24, 1729 – October 2, 1778

Susan Johnson: 1767 – April, 1801

Thomas Johnson III: April 19, 1768 - (Unknown)

Fayette Johnson: October 15, 1781 – September 24, 1829

Richard Johnson: (Unknown) – August, 1828

Mi(eroded) Johnson: May, 1829 – Broken Headstone

The Suzanne property is located in the Hollowed Ground Scenic Byway area, which is part of the Underground Railroad. In their walk for freedom, the slaves, coming up from Virginia accessed what now is East Basford Road and Ballenger Creek Pike as part of their route northward. There is allegedly a former safe house that confronts the Suzanne property.

The Suzanne property is visible from Route 15, Mar-Lu-Ridge, East Basford Road and Ballenger Creek Pike. Many cyclists and motorcyclists frequent East Basford Road and Ballenger Creek Pike during the warmer months because it is a beautiful, history filled, safe area to ride with very little traffic.

There are only two roads available to access the Suzanne property, East Basford Road and Ballenger Creek Pike. The portion of Ballenger Creek Pike that is adjacent to the Suzanne site is a two lane, windy road with several sharp curves and is unsuitable for large trucks.

East Basford Road is designated as a Rural Road by the Rustic Roads Program. The Rustic Roads program is designed to preserve the county's rural character, history, and scenic beauty. To be considered for participation in the program the road must have low traffic (under 1,000 vehicles/day), low speed limits (under 35 mph) and be outside of growth areas. East Basford Road is a very narrow, unmarked, tar and chipped road and will never be asphalted or striped. The road was not designed for high volume traffic or large heavy truck traffic.

Since 2000, several different rezoning requests have been made and all the requests were denied by the county. A golf course, a large megawatt gas-burning power plant, a housing subdivision, an electrical power plant, a solar plant and a data center, all denied.

In 2023, Sam Fadul, on behalf of the Suzanne Irrevocable Family Trust requested the zoning be changed from A to GI, to construct a data center. The request was denied by the county.

On July 31, 2025, Sam Fadul, of the Suzanne Irrevocable Family Trust, again requested to have the properties at [2404 & 2518 Ballenger Creek Pike, Adamstown](#), rezoned from Agriculture to General Industrial and additionally requests to be included in the CDI overlay. Absolutely NOTHING has changed in the character of the community since Sam Fadul's last rezoning request in 2023. Qloop buried fiber cables in the Potomac Edison Transmission Line easement area, that's it.

Frederick County is known for its farmland and scenic beauty.

The East Basford Road-Ballenger Creek Pike area is rich in history and known for its picturesque farmland. This area is special, from Confederate and Union soldiers camping in the fields as they headed north, to some of the most fertile and productive soil in the State of Maryland.

I respectfully request that the county council deny the Suzanne Irrevocable Family Trust's request to be rezoned from Agricultural to General Industrial and or Limited Industrial.

I also request that the Suzanne Irrevocable Family Trust's request to be included in the CDI overlay be denied as well.

Sincerely,

Santa Hsu

[4731 E Basford Road](#)
[Frederick, MD 21703](#)

council meeting 12/16/25

From: Anne Garnett, agarnett02@gmail.com / 240-285-6517
3264 Geranium Court
Adamstown, MD 21710

Whole Council and The Executive of Frederick County,

Dear all,

To Say I am extremely disappointed in the Government of Frederick County and State Government, is a understatement.

Each and every time I come to a Council meeting or hear from our executive. This data center is going to do nothing but help in the running of things. The jobs (what jobs?) it will produce, the tax revenue it will bring in etc.

So far all it has done is stir up the Super fund site on EastAlco property. And lower wells and cause pollution in wells as well as the beginning of raising our electric Bills.

So again why is the council trying to enlarge Data Center acreage before we see the positive and negatives of what you have already done.

You have started the process with the 2000 acres of Eastalco property and you refuse to just see what happens before you enlarge the space. Why? I don't know? But I do know it is a mistake to do this now.

I also keep hearing it is not in the Councils purview to do the following get involved with the super fund area on the property (belongs to the State) The Water usage that is the State problem. The Electricity again belongs to the State.

you the Council have pushed this and it will be handed off to the next council just like it was when Eastalco came in and left a

mess. But it is This council who will be remembered for not doing the following:

Protecting the folks that live in Adamstown

Making sure the state is doing all it should to protect the Ground water, and Air in Adamstown.

Preventing the pollution of wells in Adamstown

Directing the Business building the DAta instead of letting CEnter them lead you.

And many other things that I may not know about yet.

Data CEnters are now being linked to rare cancers (as on NBC news). So This push to move on the overlay and give even more land over to building DAta Centers is a mistake in my opinion. If things prove out in a positive way you can always to it in the future.

I am not against data centers I am against the way you are doing it at this time. Data CEnters should be controlled and the Council and planning and State government, should be doing a better job of that.

DENY the Adamstown Overlay Expansion

From Edna Howard <ednahoward@yahoo.com>

Date Sun 12/14/2025 10:39 AM

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

[EXTERNAL EMAIL]

Good morning Council Members,

I am writing to ask you to DENY the overlay expansion to beyond the East Alcoa site. Let's please wait and see what the impact the already built data centers will have on the area before expanding.

This is truly an issue that will impact the Adamstown community for a number of years to come. From hundreds of gas diesel generators, to noise and dirt issues, to electric and contaminated well waters, to environmental issues, to Carroll Manor Elementary youth, to electric bills increasing and property values decreasing.

We don't need hyperscale AI data centers, but we do need clean water and air. Elected

officials aren't listening to their constituents and are still repeating the lies and empty promises in spite of the ample evidence of crimes against working class by these monstrosities. Rushing construction is dangerous since data centers can use as much water and electricity as an entire city. More than 200 environmental groups have demanded a halt to new datacenters across the US so it makes sense to wait on the overlay expansion to see what's going to happen with what's already there.

This is such a beautiful area and you are destroying it if you approve more land for them to build these data centers on. If it such a great idea, then spread them out and put them all over Frederick County.

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



FOR: County Council members

From KARLYS KLINE <kline901@comcast.net>
Date Sun 12/14/2025 12:05 PM
To Council Members <CouncilMembers@FrederickCountyMD.gov>

📎 1 attachment (408 KB)

Data Ctr, County Council, 12-16-25.pdf;

[EXTERNAL EMAIL]

Dear County Council members...Please read my attached letter regarding data centers. Thank you, Karlys Kline

Dec. 15, 2025

Frederick County Council
12 East Church Street
Frederick, MD 21701

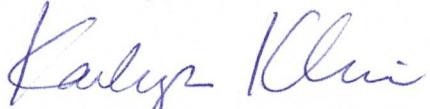
Dear President Young and Members of the Frederick County Council,

As a longtime Frederick County resident and supporter of local nonprofits, including as a founder of the Women's Giving Circle, I strongly support the expanded Critical Digital Infrastructure Overlay. Data centers generate stable tax revenue and foster partnerships that help nonprofits, including women's empowerment initiatives, extend our impact.

Since development began in 2024, these data center companies like Rowan have shown an impressive commitment to supporting community programs, including the Giving Circle and many other community-driven causes. Their sustainable development practices further align with our shared goal of responsible growth that will keep Frederick County feeling like Frederick County – hospitable, beautiful, and full of potential.

Approving this overlay is an opportunity to strengthen nonprofits, create local opportunities, and build a more resilient community. I urge your support.

Sincerely,



Karlys Kline

35 E. All Saints St
304
Frederick, MD 21701
Kline901@comcast.net
240-37-6400



Halt the Expansion of the Data Center Zone

From Seth Funk <seth.n.funk@gmail.com>

Date Sun 12/14/2025 2:29 PM

To Council Members <CouncilMembers@FrederickCountyMD.gov>

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

[EXTERNAL EMAIL]

To the Councilmembers and Council Executive of Frederick County,

My name is Seth Funk and I am emailing to demand you reject the expansion of the data center zone in Frederick County. This proposal is not only dangerous and destructive to the environment, it would cripple affordability for the citizens of Frederick County and the neighboring counties. This idea is short sighted and pushed by massive corporations who don't care about what happens to the people here; they only see massive dollar signs in their profits, and hope that by waving a tiny fraction of these profits in front of you, you'll forget that you are here to work for the people of Frederick, not Big Tech.

Affordability has, thus far, been a prominent message across the county for its people. Many of you campaigned on precisely this issue. Data centers will drive up energy costs even further at a time when people can barely afford it already. I paid nearly \$200 in electricity before the coldest parts of the season even began, and that was with significant steps to lower my energy usage before the winter months. How do you plan to build an affordable place to live and keep up with the growth of the county after their bills skyrocket and their home values plummet?

You propose to add areas that are from Priority Preservation areas and Rural Legacy Areas, but then claim that the money from the Data Centers will be used to assist with environmental projects. How is this plan even coherent? You need to destroy the environment and the work of over 15 years of protection in order to fund restarting the entire process? Should this expansion go through, this single industry will destroy all of the progress that Frederick has made in its stewardship, and all of it will have been for nothing. The complex has been given numerous "Stop Work" orders and there are two ongoing investigations with the MD Attorney General. Do you truly believe that they will respect any environmental rules you lay before them?

There are no plans to generate additional power for this complex, which will use two entire Baltimore's worth of energy, and no study has been done to understand the potential impacts it will have on the county. So, with no understanding of the future, no understanding of how this will affect your residents, and no plans to generate additional power, how is expanding the size of the data center zone wise?

My family and I have lived, worked, and died in-and-around Frederick County for generations. I know the location of my great-great-great grandfather's home before he served in the 4th Maryland in the Civil War. I have ancestors that were here for the War of Independence. We have deep connections to

this area. The skyrocketing cost of living prices, including food, housing, and energy, have already driven out so many from the area and even the state. This data center would make all of them exponentially worse, even if not expanded.

Please do not expand this zone. Do not expand it because of the promise of a small fraction from the companies now. Remember that you work for the people of Frederick County. Do not sell the future of Frederick County and the ability for working people, like me and my family, to live and raise a family in this great community.

I hope that you make the right decision for the people of Frederick, and reject this expansion.

Opposition to Overlay Zone at Quantum Frederick Site

From Steve Bruns <stevebruns@aol.com>
Date Sun 12/14/2025 1:38 PM
To Council Members <CouncilMembers@FrederickCountyMD.gov>

[EXTERNAL EMAIL]

Dear Frederick County Council Members,

Proponents of data centers talk of new jobs and tax revenues. But the jobs they speak of are few—temporary construction jobs and a handful of technicians to run the centers. In fact, the whole point of Artificial Intelligence is to eliminate jobs—by the tens of millions. It will decimate the State’s tax base.

Dario Amodei, CEO of Anthropic, predicts that AI could wipe out half of all entry-level white-collar jobs in the next one to five years and that unemployment in the US could hit 10% - 20%. Vermont Senator Bernie Sanders* says the job losses could hit 40% of registered nurses, 47% of truck drivers, 64% of accountants, 65% of teaching assistants, and 89% of fast food workers, among many other occupations.

There are many other issues that need to be addressed—water and electric power to name just two. As Senator Sanders notes, we need federal regulation. We in Maryland, however, can’t wait for federal action. Until the issues are resolved, the responsible approach for our government would be to halt further construction of data centers in Frederick County.

* <https://www.sanders.senate.gov/op-eds/ai-poses-unprecedented-threats-congress-must-act-now/>



Re: NO to Suzanne Irrevocable Trust Rezoning and Overlay Requests

From Vicki Michael <vickimichael@comcast.net>

Date Sat 12/13/2025 9:45 PM

To Angela Cook <dogmom65412@gmail.com>

Cc Santa Hsu <santahsu@comcast.net>; Knapp, Renee <RKnapp@FrederickCountyMD.gov>; Young, Brad <BYoung@FrederickCountyMD.gov>; County Executive <CountyExecutive@FrederickCountyMD.gov>; Council Members <CouncilMembers@FrederickCountyMD.gov>; Donald, Jerry <JDonald@FrederickCountyMD.gov>; McKay, Steve <SMckay@FrederickCountyMD.gov>; Keegan-Ayer, MC <MCKeegan-Ayer@FrederickCountyMD.gov>; Duckett, Kavonte <KDuckett@FrederickCountyMD.gov>; Carter, Mason <MCarter@FrederickCountyMD.gov>; Amy And Sten Olsson <olssons@gmail.com>; Billy Beam <billbeam4th@gmail.com>; Brian Sweeney <briansweeney8911@gmail.com>; Carl Rosey <croseycool@gmail.com>; Dale Franklin <dale.franklin@yahoo.com>; Eric Schaub <Eschaub101@aol.com>; Elyse Wilson <elysewilsonkhk@gmail.com>; Jack Le <Jackqle@hotmail.com>; Jason Norris <jason_norris301@hotmail.com>; John Laura Noffsinger <Rymer67@msn.com>

[EXTERNAL EMAIL]

Bravo!

Vicki Michael

Sent from my iPad

On Dec 13, 2025, at 8:40 PM, Angela Cook <dogmom65412@gmail.com> wrote:

This is beautiful. So terrifying that our property could be turned to a wasteland in the blink of an eye. See you at the meeting.

Angela Cook

On Sat, Dec 13, 2025 at 6:44 PM Santa Hsu <santahsu@comcast.net> wrote:

Good evening,

I grew up in Buckeystown, in fact my mother still resides there, in the very same house. I attended Carroll Manor Elementary School and for the last 23 years I have resided on East Basford Road. Over the years I watched things change in Frederick County, some good and some not.

I remember when they were building Eastalco. I thought how sad that all that beautiful land was going to become a aluminum industrial plant. Eastalco basically built their plant in the center of the property, planted trees, put up buffers and stayed away from the local residents homes. They provided jobs, paid a decent wage, offered benefits and

a retirement package. It provided a good life for mostly local residents and many were able to retire comfortably.

Things changed. The former Eastalco is now Quantum Frederick or Quantum Maryland, the name depends on if you're talking to a developer or a resident. Enormous, tall, ugly concrete data centers are being built, almost right up to residential property lines. You can see these monstrosities from any of the roads that surround the property and more are being constructed .

When the data center is completed and the construction workers are gone, very few people will be employed there and most will not be local. Let's not forget about the massive number of diesel fueled, polluting generators and all the diesel fuel that will be stored on site. There are still over 550 acres that are available to be built on at the original site. An overlay to add more acreage to build more data centers just seems like greed at this point.

There are enough valid and serious concerns with the original approved data center site that no overlay should even be considered at this time.

6 miles down the road from Quantum, heading south west on Ballenger Creek Pike you will see beautiful rolling farmland, cornfields, soybean fields, an abundance of wildlife, breathtaking sunsets and skies so clear at night you cannot count all the stars.

On February 21, 2023, The Suzanne Family Irrevocable Trust purchased the properties at [2404 & 2518 Ballenger Creek Pike, Adamstown](#), totaling approximately 257 acres for the sole purpose of building a data center. The realtor, MacRo, clearly advertised that the property was in a Priority Preservation Area and in the Carrollton Manor Rural Legacy Area Program. MacRo even listed a full page of land uses that being in the PPA would allow. Data centers, Microgrids, battery storage, solar arrays and 30 million dollars worth of an EV fleet were not on that list.

A little bit about the property at [2404 & 2518 Ballenger Creek Pike, Adamstown](#) and the surrounding area:

The Suzanne property's 257 acres has never been anything but a working crop farm. 69.3% of the soil on the property site is identified as Prime Farmland and Farmland of Statewide Importance.

The Suzanne property is not consistent with the 2012 Comprehensive Plan nor is it in the Eastalco Growth Area or the Adamstown Community Growth Area.

There is no public water or sewer and per Frederick County, none is planned.

On the Suzanne property there are two creeks that run completely across the property. The creeks both flow into the Tuscarora Creek, which is a tributary of the Potomac River. The upper creek on the Suzanne site is fed from the creek on the James Cook property, located on East Basford Road. The Cook's portion of the creek is enrolled in the Maryland Conservation Reserve Enhancement Permanent Easement Program. I doubt the State of Maryland invested their resources to plant native vegetation and put in erosion barriers in order to protect the creek only to have it run onto the Suzanne

property and become polluted with industrial debris and chemicals that will end up in the Potomac River. There is also a portion of the Suzanne property that is in a FEMA Floodplain, located from the upper stream to the lower stream.

Near the center of the Suzanne property is a private Johnson family cemetery :

Thomas Johnson II: August 24, 1729 – October 2, 1778

Susan Johnson: 1767 – April, 1801

Thomas Johnson III: April 19, 1768 - (Unknown)

Fayette Johnson: October 15, 1781 – September 24, 1829

Richard Johnson: (Unknown) – August, 1828

Mi(eroded) Johnson: May, 1829 – Broken Headstone

The Suzanne property is located in the Hollowed Ground Scenic Byway area, which is part of the Underground Railroad. In their walk for freedom, the slaves, coming up from Virginia accessed what now is East Basford Road and Ballenger Creek Pike as part of their route northward. There is allegedly a former safe house that confronts the Suzanne property.

The Suzanne property is visible from Route 15, Mar-Lu-Ridge, East Basford Road and Ballenger Creek Pike. Many cyclists and motorcyclists frequent East Basford Road and Ballenger Creek Pike during the warmer months because it is a beautiful, history filled, safe area to ride with very little traffic.

There are only two roads available to access the Suzanne property, East Basford Road and Ballenger Creek Pike. The portion of Ballenger Creek Pike that is adjacent to the Suzanne site is a two lane, windy road with several sharp curves and is unsuitable for large trucks.

East Basford Road is designated as a Rural Road by the Rustic Roads Program. The Rustic Roads program is designed to preserve the county's rural character, history, and scenic beauty. To be considered for participation in the program the road must have low traffic (under 1,000 vehicles/day), low speed limits (under 35 mph) and be outside of growth areas. East Basford Road is a very narrow, unmarked, tar and chipped road and will never be asphalted or striped. The road was not designed for high volume traffic or large heavy truck traffic.

Since 2000, several different rezoning requests have been made and all the requests were denied by the county. A golf course, a large megawatt gas-burning power plant, a housing subdivision, an electrical power plant, a solar plant and a data center, all denied.

In 2023, Sam Fadul, on behalf of the Suzanne Irrevocable Family Trust requested the zoning be changed from A to GI, to construct a data center. The request was denied by the county.

On July 31, 2025, Sam Fadul, of the Suzanne Irrevocable Family Trust, again requested to have the properties at [2404 & 2518 Ballenger Creek Pike, Adamstown](#), rezoned from Agriculture to General Industrial and additionally requests to be included in the CDI overlay.

Absolutely NOTHING has changed in the character of the community since Sam Fadul's last rezoning request in 2023. Qloop buried fiber cables in the Potomac Edison

Transmission Line easement area, that's it.

Frederick County is known for its farmland and scenic beauty. The East Basford Road-Ballenger Creek Pike area is rich in history and known for its picturesque farmland. This area is special, from Confederate and Union soldiers camping in the fields as they headed north, to some of the most fertile and productive soil in the State of Maryland.

I respectfully request that the county council deny the Suzanne Irrevocable Family Trust's request to be rezoned from Agricultural to General Industrial and or Limited Industrial.

I also request that the Suzanne Irrevocable Family Trust's request to be included in the CDI overlay be denied as well.

Sincerely,

Santa Hsu

4731 E Basford Road

Frederick, MD 21703



Re: URGENT ACTION REQUIRED Before Dec 23rd VOTE: The Council Must Use CDI-OZ to Ban Diesel Generators and Mandate Clean Tech

From Elizabeth Law <bettybob1758@gmail.com>

Date Sun 12/14/2025 11:23 AM

To Elyse Wilson <elysewilsonkhk@gmail.com>

Cc McKay, Steve <SMcKay@FrederickCountyMD.gov>; Donald, Jerry <JDonald@FrederickCountyMD.gov>; Luna, Nancy <NLuna@FrederickCountyMD.gov>; Duckett, Kavonte <KDuckett@FrederickCountyMD.gov>; Carter, Mason <MCarter@FrederickCountyMD.gov>; STEVE MCKAY <stevemckay@comcast.net>; Council Members <CouncilMembers@FrederickCountyMD.gov>; County Executive <CountyExecutive@FrederickCountyMD.gov>; Planning Commission <PlanningCommission@FrederickCountyMD.gov>; Venable, Victoria <Venable@FrederickCountyMD.gov>

[EXTERNAL EMAIL]

Elyse,

I concur with your assessment.

Even in the immediate future there will be at least 100 such machines near Carroll Manor Elementary School. These devices will emit copious amounts of pollution, which is well known to cause serious respiratory problems and even cancers in developing children. The excessive noise can damage hearing, especially in young children.

The advantages to the public and the environment are obvious. Batteries are silent and non-polluting. They do not need tanks holding 20,000 gallons of diesel fuel for each building or the regular truck travel on rural roads to deliver the diesel fuel.

We need to incorporate battery storage systems into all future data center sites and to add this requirement into all CDI ordinances. The technology is advancing in megawatts available for longer times and with increasing safety. Many manufacturers offer a variety of battery systems.

Thanks,

Betty Law

On Thu, Dec 11, 2025 at 3:14 PM Elyse Wilson <elysewilsonkhk@gmail.com> wrote:

Honorable County Executive Fitzwater and Members of the Frederick County Council,

As a resident of Adamstown, I write to underscore the most critical decision before you: **Your vote on the CDI Overlay Zone (CDI-OZ) on December 23rd will determine if over 1,000 polluting diesel generators are allowed to permanently poison our community.**

We demand that the Council use the CDI-OZ to impose new, higher standards that retroactively apply to all unfinished projects.

I. The Council's Absolute Legal Power to Intervene Now

Do not let developers claim your hands are tied. The Council absolutely retains the legal and zoning authority to stop this pollution, particularly because the **full pollution package (the 1,000+ diesel generators) is NOT yet vested or fully permitted.**

Legal/Political Lever	The Council's Authority
Zoning Amendment (CDI-OZ)	You can pass an amendment to the CDI-OZ on December 23rd that imposes new restrictions on specific uses based on public health and safety.
Site Plan Loophole	The vast majority of generators are still pending Building Permits . You have the power to pass a bill that immediately halts the issuance of any further Building Permits for fossil fuel backup systems within the CDI-OZ.
Maryland Land Use Authority	State law empowers you to impose restrictions "to preserve, enhance, or protect the general character" of the land—a direct justification against air pollution.

[Export to Sheets](#)

II. The Ethical Imperative: Ban Pollution, Mandate Clean Jobs

You face a false choice. The solution is not to eliminate jobs, but to **mandate cleaner, safer, long-term union jobs.**

- **The Diesel Lie:** The construction jobs are temporary (1-3 years). The pollution from diesel generators is **permanent** (20+ years of toxic NOx and PM2.5 emissions) that permanently threatens the health of our children near Carroll Manor Elementary.
- **The Clean Mandate:** The Council must mandate the use of zero-emission alternatives that are proven and commercially available: **Battery Energy Storage Systems (BESS)** and **Green Hydrogen Fuel Cells**. This provides the IBEW with the highly skilled, long-term clean energy installation and maintenance jobs they seek, without sacrificing community health.

III. The Binding Mandates We Demand Before December 23rd

We demand that the Council amend the CDI-OZ with the following two legally binding conditions:

A. Mandate the Diesel Ban and Clean Substitution

"Notwithstanding any prior site plan or conditional approval, the issuance of any new Building Permit or Occupancy Permit for any fossil-fuel-fired emergency power generator in the CDI Overlay Zone is hereby PROHIBITED. The developer shall substitute the previously planned fossil fuel backup systems with an equivalent capacity of Battery Energy Storage Systems (BESS) and/or Green Hydrogen Fuel Cells."

B. Mandate the 100% Green Power Source

"All data center facilities within the CDI Overlay Zone must achieve and maintain 100% verifiable Carbon-Free Energy (CFE) for all operational load, meeting the standard already set by industry leaders one state away."

Do not allow the loophole of SB474 to condemn Frederick County to decades of irreversible pollution. Your vote on December 23rd must uphold your duty to public health over a developer's

short-term profit.

Sincerely,

Elyse Wilson



Outlook

Stop Data Center Expansion

From Elizabeth Willis <mcbeth@mac.com>

Date Sun 12/14/2025 8:58 AM

To Council Members <CouncilMembers@FrederickCountyMD.gov>; County Executive Jessica Fitzwater <info@jessicafitzwater.com>; Planning Commission <PlanningCommission@FrederickCountyMD.gov>

Cc John Willis <macjohn@mac.com>

[EXTERNAL EMAIL]

Dear Elected Officials,

We write yet again urging you to accept the recommendations of the Planning Commission re: the proposed data center overlay.

We were dismayed to read comments in the press from some of you re: your inclination to support a hybrid approach to data center expansion, rather than accept the recommendations of the Planning Commission. We recognize that this is a complex issue, complex with different stakeholders, competing priorities and technical land use and planning issues. We can only cite any number of other jurisdictions that have cut through the noise and made wise decisions to limit data centers to preserve land, address environmental issues and mitigate negative economic impact concerns.

We were dismayed to read about the proposed use of diesel generators for the Adamstown data centers currently under construction, as it makes clear the environmental impact of even the data centers we have already approved. The normal electric grid power used by the data centers will cause so much additional greenhouse gas emissions that *Frederick County's climate policies will all be obliterated. Everything the county and the citizens have done in the last 15+ years will be undone.* Every new climate regulation and all the spending to cut emissions will be replaced by this one new industry.

We were dismayed to receive in the mail yet again, glossy, expensive advertising from the Data Center Alliance of Maryland, that "greenwashes" the impacts of the data centers, and provides misleading information about the issues and concerns that so many of your constituents have raised about the proposed data center overlay zone. It is clear who has the money to influence, and it is not your concerned constituents.

We remain dismayed that the almost daily articles in the national press addressing data center impacts, and questioning the economic promises being made- that this veritable tsunami of information does not seem to figure into the thinking of many of you as you contemplate the upcoming consequential vote.

We remain dismayed, and incredulous that the many questions raised by so many of your constituents have not been addressed. These include:

- Why hasn't there been an independent and thorough economic analysis of the impacts and costs of an expanded overlay zone?
- Why is this expansion being proposed at this time when the Data Centers Workgroup and current County regulations say there should be no data centers in Priority Preservation or Rural Legacy areas?
- Why are we proposing to expand the CDI Overlay by another 1000 acres of prime farm land, when both the county and the state appear unable to effectively monitor and regulate the significant environmental violations from the current construction?
- Where is the power to operate these data centers going to come from? More power lines like MPRP will be needed to bring in the energy for this huge data center zone. Adding another 1000 acres of data center will need even more electricity. If the power demands, and impacts on Frederick County, are still unknown for the current data center area, then how is it a good idea to double the size of the data center zone?

Continuing to wish you wisdom and courage as you work to address this vital issue.

Beth Willis mcbeth@mac.com
Dr. John Willis macjohn@mac.com
8135 Ball Rd
Frederick, MD 21704
301-514-7648



Stop Data Center Sprawl in Frederick County

From Julien Libert <j.r.libert.a@gmail.com>

Date Sun 12/14/2025 11:39 AM

[EXTERNAL EMAIL]

Hello,

I am writing to ask that we put the strictest limitation on data center development in our county. Given the costs - electric bills, home values, quality of life, mooting of so many environmental efforts county officials and residents have undertaken in recent years - we should table any expansion. The council can wait until we're on the other side of this so called AI bubble, and these very innovative companies behind this industry have come to the table with crucial new ways for them to sustainably power and cool their industries.

Thank you,

Julien

Frederick, MD



STOP THE DATA CENTER INSANITY

From Krista Ochlech <kochlech@comcast.net>

Date Sun 12/14/2025 11:16 AM

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

[EXTERNAL EMAIL]

All,

Have you seen what is happening in our community? I sincerely hope you care enough to see it for yourself.

The rapid expansion of data centers will have serious consequences for residents: increased electric bills, strain on our water supply, air pollution, noise and light pollution, and a significant loss in nearby property values. While some impacts may not be felt equally by everyone, many of us will bear the brunt of these changes. Frequent power issues, including blackouts and brownouts, are not hypothetical concerns—they affect daily life and damage appliances.

This is not the “Livable Frederick” we were promised. It feels more like Northern Virginia’s sprawl creeping into a community that many of us deliberately chose for its semi-rural character. We moved here believing Frederick County valued balance, planning, and quality of life. That belief is now being tested.

I strongly urge you to visit the affected area before voting on the data center expansion. If the expansion moves forward, the anticipated tax revenue will likely be consumed by the need for major infrastructure upgrades. Our roads are already at capacity, and surrounding neighborhoods will see declining property values through no fault of their own.

Please consider the long-term impacts on residents and the character of our community. Thoughtful growth matters and so does protecting the people who already live here.

Do the right thing. Enough is enough.

Krista Ochlech
5809 Underwood Ct
Adamstown, MD 21710

STOP the DataCenter expansion in Frederick County

From Martha Morris <morrism@gwu.edu>

Date Sun 12/14/2025 1:02 PM

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

[EXTERNAL EMAIL]

Dear Council members please review the following issues that are critical to me and my family as residents of Frederick County.

1) **No objective economic analysis has been done** or has even been proposed yet to support the huge changes to the character of the region. The Plan says that the County makes significant investments in its Growth Areas.

QUESTIONS:

- a) How much will an increased Eastalco Growth Area cost?
- b) What is the NET revenue from this huge increase in industrial activity?
- c) How will skyrocketing electric bills and crashing home values affect the financial impact of adding more data centers?

2) **Expansion of the data center zone could require the elimination of more than 1000 acres of farmland.**

All of this prime agricultural soil is in either the County Priority Preservation Area or the State Rural Legacy area, or **BOTH**. The Data Centers Workgroup and current County regulations say no data centers in Priority Preservation or Rural Legacy areas.

QUESTION: Why is this even being proposed?

3) **Both the county and the state appear unable to effectively monitor and regulate environmental violations from the current construction.**

Since start of construction the sites have racked up well over 100 major environmental violations. The complex has been given “Stop Work” orders and there are **still** two ongoing Maryland Attorney General’s Office investigations.

QUESTION: Given these limitations, why is it prudent to expand the CDI Overlay by another 1000 acres?

4) **The current, already approved, Eastalco Data Center Complex will use the same amount of electricity as TWO Baltimores.**

QUESTIONS:

- a) Where is this power going to come from? More power lines like MPRP will be needed to bring in the energy for this huge data center zone. Adding another 1000 acres of data center will need even more electricity.

b) If the power demands, and impacts on Frederick County, are still unknown for the current data center area, then how is it a good idea to double the size of the data center zone?

5) The power demands of two or three Baltimores also brings pollution to our region. The current Eastalco data center area will need over 1000 diesel generators, each the same size as a freight train locomotive.

Expanding the data center area will require even more generators. The normal electric grid power used by the data centers will cause so much additional greenhouse gas emissions that *Frederick County's climate policies will all be obliterated. Everything the county and the citizens have done in the last 15+ years will be undone.* Every new climate regulation and all the spending to cut emissions will be replaced by this one new industry.

We wish the county to act responsibly in decisions about this industrial growth that will impact residents economically and reduce the treasured landscape and important agricultural production. We very much object to expanding the data center development in the county!

Sincerely,

--
Martha Morris Shannon
Point of Rocks, Md

Urgent: Rowan is Cashing Out! The \$10 B Lie!!

From Elyse Wilson <elysewilsonkhk@gmail.com>

Date Sun 12/14/2025 12:28 PM

To Council Members <CouncilMembers@FrederickCountyMD.gov>; County Executive <CountyExecutive@FrederickCountyMD.gov>; McKay, Steve <SMcKay@FrederickCountyMD.gov>; Donald, Jerry <JDonald@FrederickCountyMD.gov>; Duckett, Kavonte <KDuckett@FrederickCountyMD.gov>; Carter, Mason <MCarter@FrederickCountyMD.gov>; Keegan-Ayer, MC <MCKeegan-Ayer@FrederickCountyMD.gov>; Knapp, Renee <RKnapp@FrederickCountyMD.gov>; Young, Brad <BYoung@FrederickCountyMD.gov>; Planning Commission <PlanningCommission@FrederickCountyMD.gov>; Venable, Victoria <VVenable@FrederickCountyMD.gov>

Cc Paula damico-Hollewa <pdhollewa@yahoo.com>; Linda Everett <linda@edgedesigngroupllc.com>; Heather Fletcher <heathertravels@yahoo.com>; Jennifer@CharltonCommunications.com <Jennifer@charltoncommunications.com>; Jenkins, Chuck (Sheriff) <CJenkins@FrederickCountyMD.gov>; Hope Green <hope.green76@yahoo.com>; Gene Butler <rollbackfarmer@comcast.net>; FRANK HOLLEWA <fjhollewa@gmail.com>; PHM <phmichael@comcast.net>; santahsu@comcast.net <Santahsu@comcast.net>; Josh Mitchell, P.E. <Jmitchell@millerbrothersinc.com>; Jordan C. Ritter <jordan.ritter@pmpbiz.com>; Luna, Nancy <NLuna@FrederickCountyMD.gov>; nanasentuo.bonsu@fox.com <nanasentuo.bonsu@fox.com>; Andrew Schotz <aschotz@newspost.com>; Marwa Barakat <mbarakat@newspost.com>; mgregory@wusa9.com <mgregory@wusa9.com>; Spencer, Darcy (NBCUniversal) <darcy.spencer@nbcuni.com>; Nancy Keen <Nancy@vanguardmgt.com>

[EXTERNAL EMAIL]

Dear Frederick County Council and County Executive Jessica Fitzwater,

I am writing to formally express my extreme concern and outrage regarding the recent news reports that Rowan Digital Infrastructure is exploring a sale of the company, potentially valuing the deal at \$10 billion.

For months, the residents of Adamstown were assured that Rowan Digital Infrastructure was a long-term "community partner" committed to responsible stewardship and delivering specific community benefits. The news that the parent company, Quinbrook Infrastructure Partners, is actively seeking to sell this asset confirms that this project was always a financial strategy designed to be "flipped" for maximum profit.

The Sale of Our Community for Profit

According to reports published on December 12, 2025, Rowan is exploring either a capital raise or a full sale of the company. The reported \$10 billion valuation is fundamentally driven by the "shovel-ready" status of its land and the controversial power and permit agreements secured here in Frederick County, Maryland.

1. Exploiting Local Approvals: Rowan secured the necessary land and obtained or is currently processing highly contested permits, including the Critical Digital Infrastructure (CDI) zoning and air quality permits related to hundreds of diesel generators for the "Bauxite" projects. They are now attempting to sell these approvals to the highest bidder.

2. Transferring Unvetted Risk: If this sale goes through, the projects and all associated environmental and community obligations will be transferred to a new, entirely unknown corporation that has made zero commitments to Frederick County. The promises Rowan made regarding noise mitigation, environmental protection, and community benefits will become worthless.

3. Breach of Trust: The residents of Adamstown did not consent to have our home packaged and sold by a private equity firm in a Wall Street transaction. We agreed to negotiate with Rowan, not a faceless entity we have never vetted.

Demand for Action

I demand that the County Council and County Executive immediately halt all pending permits and site plan approvals for Rowan Digital Infrastructure.

We cannot allow a "bait and switch" scenario where approvals are granted to one entity, only for them to immediately sell the rights to a new operator. If the applicant changes due to a sale, the application process must be reviewed from scratch. I urge you to stop allowing developers to play financial games with our air quality and the well-being of our community.

Furthermore, I must highlight that the claims of long-term economic benefits are misleading. Data centers offer minimal permanent employment, often only 20 to 25 jobs after construction per Data Centers. This is a poor trade-off for the permanent environmental impact on Frederick County, including the use of over 1,000 diesel generators for the initial 1,600 acres alone. The County should prioritize permanent, sustainable employment opportunities, such as those provided by pharmaceutical companies, over temporary data center jobs.

The County has many other choices that will provide long-term employment and environmental responsibility, thereby supporting the economy instead of damaging it in the long run.

Sincerely,

Elyse Wilson

Adamstown, MD

CC and CC the broader community of Adamstown in South Frederick, Maryland, and posting on all social media platforms

See proof of the sale below

Data Center Firm Rowan Explores Capital Raising Or Sale- The Information

Dec 12, 2025 at 18:28 GMT-5 ·

Refinitiv · Less than 1 min read

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- **DATA CENTER FIRM ROWAN
EXPLORES CAPITAL RAISING OR
SALE- THE INFORMATION**
- **A DEAL COULD VALUE ROWAN
DIGITAL INFRASTRUCTURE AT \$10
BILLION- THE INFORMATION**

From: Elyse Wilson <elysewilsonkhk@gmail.com>
Sent: Thursday, December 11, 2025 10:56 PM
To: Council Members <CouncilMembers@FrederickCountyMD.gov>; County Executive <CountyExecutive@FrederickCountyMD.gov>; McKay, Steve <SMcKay@FrederickCountyMD.gov>; Donald, Jerry <JDonald@FrederickCountyMD.gov>; Duckett, Kavonte <KDuckett@FrederickCountyMD.gov>; Carter, Mason <MCarter@FrederickCountyMD.gov>; Keegan-Ayer, MC <MCKeegan-Ayer@FrederickCountyMD.gov>; Knapp, Renee <RKnapp@FrederickCountyMD.gov>; Young, Brad <BYoung@FrederickCountyMD.gov>
Cc: Lewis Young, Karen Senator <karen.young@senate.maryland.gov>; Folden, William Senator <william.folden@senate.maryland.gov>; Pippy, Jesse Delegate <jesse.pippy@house.maryland.gov>; april.miller@house.maryland.gov; Dustin Branch <dustin@chesapeakeclimate.org>; governor.mail@maryland.gov; Alex Lima -MDE- <alex.lima@maryland.gov>; Jennifer@CharltonCommunications.com; nanasentuo.bonsu@fox.com; justin.ready@senate.maryland.gov
Subject: (1) Strategic Policy Review: Frederick County's Regulatory Authority and Techno-Economic Mandate for Sustainable Digital Infrastructure

[EXTERNAL EMAIL]

To Frederick County Council and Frederick County Executive Jessica Fitzwater,

The proposed change does not compromise your tax revenue or job creation; it simply replaces the current, environmentally toxic diesel generators with a proven, cleaner backup system. This updated technology is already operational in neighboring communities like Dickerson, MD, and Chantilly, VA. Adopting it is crucial because it will **save lives and improve public health** by mitigating serious risks associated with diesel emissions, including cancerous side effects, respiratory damage, and exacerbated cardiovascular disease.

Approving the estimated 1,000 diesel generators (under all completed permits) within 2,000 feet of Carroll Manor Elementary is a direct violation of the State's core Environmental Justice commitment to ensure 'equal protection from environmental and public health hazards.' This cluster of industrial, carcinogenic pollution near a school is precisely the type of disproportionate burden the **VOICE Executive Order** was established to prevent and must be rejected

Strategic Policy Review: Frederick County's Regulatory Authority and Techno-Economic Mandate for Sustainable Digital Infrastructure

Executive Summary: Policy Synthesis and Critical Intervention Points

Frederick County, Maryland, is currently navigating a critical regulatory confluence as it seeks to balance economic growth from the burgeoning data center industry—particularly within the **Critical Digital Infrastructure Overlay Zone (CDI-OZ)** near Adamstown—with its core objectives of environmental sustainability and quality of life preservation. This analysis confirms that while the County Council lacks the immediate, unilateral legal authority to revoke state-issued environmental permits for already-approved technology, it retains **decisive leverage** over subsequent development phases.

- **Core Finding:** Frederick County's regulatory control is strategically concentrated in its **land-use and zoning framework**, specifically via the CDI-OZ and the **Conditional Use Permit (CUP)** process. This framework provides a legally defensible pathway to mandate a transition from legacy diesel generator backup systems and inefficient cooling to modern, green solutions, such as **Battery Energy Storage Systems (BESS)** and high-efficiency **liquid cooling**, for the estimated six to eight data center facilities that have yet to receive final permits.
- **Techno-Economic Justification:** The required technological shift is justified not merely on environmental grounds but also by compelling techno-economic arguments. Detailed **Total Cost of Ownership (TCO) analysis** demonstrates that BESS and high-efficiency liquid cooling offer significant long-term **Operational Expenditure (OpEx) savings**, streamlined regulatory compliance, and a robust defense against rapid technological obsolescence, thereby validating the County's proactive long-term planning strategy.
- **Recommendation:** The County should immediately **codify zero-emission backup and advanced cooling** as non-negotiable performance standards for all pending and future CUP applications within the CDI-OZ.

Section 1: The Regulatory Confluence—Navigating State Air Quality vs. Local Land Use Control

Frederick County's capacity to influence the technology deployed by data center developers, such as Amazon Data Services and Aligned Data Centers, is defined by the complex intersection of state-level air quality permitting and local land-use zoning authority. Understanding this jurisdictional division is crucial for formulating an effective intervention strategy.

1.1. Current Status of Data Center Permits in Adamstown

Initial phases of data center development have primarily proceeded under the regulatory purview of the **Maryland Department of the Environment (MDE)**, which oversees Air Quality Permits to Construct (PTC).

Status	Developer	Permit Type	Equipment Permitted	County Control Implications
Issued	Aligned Data Centers	MDE PTC (Jan 2025)	43 diesel-fired emergency generators (42 x 3,000 kW, 1 x 1,000 kW), each with Selective Catalytic Reduction (SCR) technology.	County Council cannot unilaterally block or legally mandate replacement without significant legal challenge (vested rights).

Status	Developer	Permit Type	Equipment Permitted	County Control Implications
Draft	Amazon Data Services	MDE Draft PTC (Nov 2025)	99 diesel generators (92 x 2,750 kW emergency generators), all larger units mandated with SCR.	County's ability to demand a complete technological switch (e.g., to BESS) is limited, as the state process focuses on compliance with existing air quality standards, not technology mandates.

The Vested Rights Barrier: The issuance of the MDE PTC grants Aligned Data Centers a vested right to construct and operate this specific equipment, provided they adhere to all MDE conditions. MDE approval focuses on ensuring the facility remains a "minor source" of emissions (Oxides of Nitrogen (\$\text{NO}_x\$) below 25 tons per rolling 12-month period), requiring continuous monitoring of SCR performance indicators and mandatory stack emissions tests. This means the County cannot legally compel the replacement of these permitted diesel units with BESS technology.

The Phased Development Opportunity: Despite the advanced status of these initial permits, the overall campuses are massive, phased developments. The estimated **six to eight future data centers or phases** yet to receive air quality permits or final local entitlements represent the critical regulatory target where Frederick County can assert maximum control and mandate green technology adoption.

1.2. Defining Jurisdictional Boundaries in Maryland Environmental Law

The County Council's strategy must legally navigate the delineation between state regulatory authority and local land use authority.

- **Supremacy of MDE on Technical Permitting:** Frederick County's local regulations acknowledge the superior authority of state agencies. MDE is the sole authority for issuing PTCs for air pollution sources. Consequently, the County cannot legally require alternative pollution control devices or enforce air emission limits that conflict with MDE's approval criteria for the specific equipment covered by an **issued PTC**.
- **The Power of Land Use Control and Zoning:** The County Council's authority is robust in the realm of land use and zoning. The legal mechanism for this control is the **Conditional Use Permit (CUP)**. Frederick County's standards for CUP review are broad, including an explicit environmental criterion: the conditional use "shall not adversely affect the natural character and environment of the County." This criterion serves as the legal fulcrum for demanding technological superiority. Maryland legal precedent suggests that local jurisdictions can enforce **more stringent** environmental standards through zoning and CUP requirements, provided they are rationally tied to legitimate local interests like public health, welfare, and quality of life.

1.3. The Legal Architecture of Local Control: Critical Digital Infrastructure Overlay Zone (CDI-OZ)

The CDI-OZ is the current legislative tool designed to restrict data center development geographically and impose stringent performance standards.

- **CDI-OZ Intent and Scope:** The CDI-OZ restricts development to specific areas (e.g., Eastalco property near Adamstown) and limits the total land dedicated to data centers. Its stated intent is to prevent sprawl and preserve quality of life.
- **The Conditional Use Permit as the Fulcrum:** Since the CDI-OZ provides only the *option* for data center development, the CUP remains the crucial, final regulatory hurdle for each individual data center building. For the remaining six to eight data centers, the CDI-OZ ordinance provides the definitive legal framework to impose **new performance standards** as a precondition for CUP approval.
- **Protecting Against Regulatory Vulnerability:** The noise and pollution from diesel generators, even those with noise suppression and SCR, directly conflict with the goal of protecting quality of life near sensitive receptors (schools, residential areas). A critical point of leverage is the regulatory gap in federal rules, which exempt diesel generator use from air quality limits during energy "emergencies." This exemption allows for a substantial, unquantifiable air quality risk for residents. By mandating BESS for subsequent phases, the County proactively uses its land-use police power to protect public health against this vulnerability.

Section 2: Technological Readiness and the Case for Obsolescence

The premise that older data center technologies are rapidly becoming outdated is supported by global industry trends driven by AI workloads, sustainability pressures, and shifting regulatory burdens. The industry is quickly pivoting to BESS and liquid cooling.

2.1. Backup Power Systems: A Comparative Analysis of Diesel vs. Battery Energy Storage (BESS)

Feature	Legacy Diesel Generators (with SCR)	Battery Energy Storage Systems (BESS)
On-Site Emissions	Harmful pollutants (particulate matter, CO_2 , NO_x , etc.). SCR only addresses NO_x .	Zero On-Site Emissions.
Noise	Significant, requiring costly enclosures and setbacks.	Silent. Ideal for sensitive areas.

Feature	Legacy Diesel Generators (with SCR)	Battery Energy Storage Systems (BESS)
OpEx & Maintenance	High; requires complex fuel logistics, frequent maintenance (oil, filters), and continuous SCR monitoring/urea handling.	Low; reduced to light inspections and monitoring. Predictable utility charging costs.
Grid Function	Primarily a consumer; strains the grid during charging/testing.	Grid-Interactive Asset; provides stabilization services, stores and releases renewable energy.
Regulatory Risk	High; complex compliance burden and perpetual liability as emissions rules tighten.	Low; inherently aligned with tightening emissions rules and corporate ESG mandates.

BESS TCO Advantage: While initial Capital Expenditure (CapEx) for BESS (approx. \$2,371\$/kW) is higher than for diesel (approx. \$1,159\$/kW), the Total Cost of Ownership (TCO) shifts dramatically due to the elimination of all hidden costs: fuel volatility, complex maintenance, and burdensome regulatory compliance. Mandating BESS requires developers to adopt a technology financially hedged against future energy price volatility and environmental legislation.

2.2. Cooling Systems: The Economic and Performance Imperative for Liquid Cooling

The shift in cooling technology is driven by the massive increases in IT rack density required by modern **Artificial Intelligence (AI) workloads**.

- **The Failure of Air Cooling for AI:** Traditional air cooling cannot efficiently handle the heat density generated by modern AI hardware. By 2025, liquid cooling is

expected to dominate new hyperscale data centers. Permitting new facilities that rely solely on outdated air-cooling technology introduces a high risk of functional and economic obsolescence within a few years, exactly as the user suggests.

- **Efficiency and Resource Management:** The cooling infrastructure is a substantial portion of a data center's power usage. Liquid cooling (direct-to-chip, immersion) provides superior financial and environmental performance. Furthermore, mandating high-efficiency liquid cooling proactively mitigates the massive water consumption concerns associated with traditional evaporative cooling towers.

Section 3: Financial Risk and Total Cost of Ownership (TCO) Analysis

To legally mandate a green technology shift, the County must establish that requiring BESS and liquid cooling is a requirement for financially responsible development, not an arbitrary imposition.

3.1. Economic Feasibility of BESS Replacement

The County's mandate is supported by the economic reality that the **avoidance of diesel's OpEx and regulatory liability** far outweighs the CapEx difference. The TCO model for diesel must incorporate:

- **Fuel Volatility and Logistics:** Ongoing, volatile costs for diesel deliveries and fuel system maintenance.
- **Regulatory Compliance Burden:** Significant costs for securing and maintaining air permits, ensuring fuel quality control, managing urea handling for SCR, performing periodic emissions checks, and preparing semiannual reports.
- **Noise and Space:** Costs for enclosures, sound walls, and site setbacks.

The long-term OpEx and regulatory advantages of BESS transform the initial CapEx disparity, providing a compelling economic justification for the mandate.

3.2. Quantifying Cooling Efficiency: Financial Returns on Liquid Cooling Investment

Advanced cooling provides dramatic financial superiority over traditional air cooling, driven primarily by lower energy consumption and reduced infrastructure needs.

Cost Category	Air Cooling (10-Year TCO)	Immersion Cooling (10-Year TCO)	Savings	Percentage Reduction
Capital Expenditures (CapEx)	\$\\$53,275,500	\$\\$31,301,089	\$\\$21,974,411	41%
Annual Operations	\$\\$10,754,882	\$\\$6,633,400 / year	\$\\$4,121,482 / year	38%

Cost Category	Air Cooling (10-Year TCO)	Immersion Cooling (10-Year TCO)	Savings	Percentage Reduction
Initial (Energy) Costs				
Total Cost of Ownership (TCO)	Baseline	Reduced by \$110,994,371	\$110,994,371	39%

Source: Modeled data center TCO analysis for a 10MW AI facility.

The analysis confirms that over a decade, immersion cooling offers a staggering **39% reduction in TCO**. The County Council can legally defend a mandate for advanced cooling technology by arguing that approving inefficient infrastructure poses an undue long-term risk to the community and the economic stability of the project.

Section 4: Mechanisms for Legislative and Contractual Intervention

The window of opportunity for Frederick County to influence the environmental trajectory is immediate, coinciding with the finalization of the CDI-OZ and the permitting process for subsequent phases. The strategy is dual-track: **mandate for the future, contract for the past**.

4.1. Leveraging the Current CDI-OZ Process for New Permits (6-8 DCs)

The ongoing effort to finalize the CDI-OZ ordinance and the associated public hearings represent the definitive legislative opportunity to embed stringent performance standards.

- **Mandatory BESS Integration:** The CDI-OZ must be amended to mandate **zero-emission backup power** (BESS or equivalent) as a precondition for CUP approval. Diesel generator deployment must be either prohibited entirely or strictly limited to a minor fraction of the total required capacity. This transforms the CUP criterion of "shall not adversely affect..." into an objective, measurable, zero-emission standard.
- **Mandatory Advanced Cooling:** Require that all high-density computing loads (e.g., those exceeding a threshold of 15kW per rack) utilize **liquid-based cooling systems** to ensure the facilities are future-proofed and maximize resource efficiency.
- **Mandatory Renewable Energy Procurement:** Condition CUP approval on developers securing binding **Power Purchase Agreements (PPAs)** for 100% renewable energy or providing verifiable Renewable Energy Credits (RECs) for the entire facility's power load.

4.2. Addressing Existing Agreements and Issued Permits (Amazon/Aligned)

The County cannot legally revoke an issued MDE PTC, but it can use contractual mechanisms tied to future entitlements to drive **voluntary technology upgrades**.

- **Leveraging Future Entitlements:** The developers require continuous regulatory cooperation for subsequent entitlements, including future building permits, zoning map amendments, and changes to **water and sewer classifications**. The County can legally condition the approval of these necessary entitlements on the developer entering into a contractual agreement to voluntarily commit to phasing out or mitigating the environmental impact of their initial, MDE-permitted diesel fleets (a "Diesel Sunset Clause").
- **Community Benefit Agreements (CBAs) as Contractual Tools:** The County should utilize CBAs to secure commitments beyond regulatory minimums. The primary environmental goal should be a **binding commitment to retrofit the initial diesel infrastructure with BESS technology** within a defined timeframe (e.g., 3-5 years post-start-up). In exchange, the County can offer streamlined or expedited review processes for the future CDI-OZ phases.

Development Phase/Status	Necessary Local Approval	County Leverage Level	Recommended Policy Action
Phase 1 Diesel (MDE PTC Issued/Draft)	MDE Air Permit (Completed/Near Complete)	Low	Contractual Negotiation via CBAs to mandate future BESS retrofits; leverage future entitlements (water/zoning).
Remaining 6-8 Data Centers/Future Phases	CDI-OZ Conditional Use Permit (CUP)	High/Decisive	Amend CDI-OZ to mandate BESS and Liquid Cooling as non-negotiable performance standards for CUP approval.
Major Infrastructure Changes (Water/Sewer)	Comprehensive Plan Amendment, Zoning Map Amendment	High	Condition necessary infrastructure approvals on adoption of green technology mandates for all

Development Phase/Status	Necessary Local Approval	County Leverage Level	Recommended Policy Action
			development phases.

Section 5: Detailed Policy Recommendations and Implementation Plan

Based on the legal authority inherent in the CDI-OZ and the compelling techno-economic justification, the following recommendations outline an implementation plan for the Frederick County Council.

5.1. Codification of Green Technology Mandates (CDI-OZ Amendment)

The immediate priority is the passage of a CDI-OZ ordinance that integrates clear, objective, and ambitious technical performance standards.

- **Zero-Emission Backup Mandate:** State that BESS or equivalent zero-emission backup power is the default and mandatory standard. Diesel backup must be technically justified and strictly limited.
- **High-Efficiency Cooling Mandate:** Require the use of liquid-based cooling systems for all high-density computing loads, ensuring efficiency, reducing OpEx (up to 38%), and minimizing reliance on water-intensive evaporative towers.
- **Mandatory Renewable Energy Procurement:** Condition all CUP approvals on the developer's commitment to fully offset energy demand with verifiable renewable energy sources (PPAs or equivalent RECs) to support state and county climate goals.

5.2. Strategy for Contractual Negotiation (CBAs and Green Transitions)

For phases already permitted or nearing permit completion, contractual leverage through CBAs is essential.

- **Leveraging Financial Credibility and ESG Goals:** Publicly communicate that diesel and air cooling are financially obsolete. Use the developers' internal pressure for ESG compliance to secure a **binding "Diesel Sunset Clause"** mandating the future retrofit of the initial diesel fleet with BESS on an agreed-upon timeline.
- **Water Allocation and Resource Control:** Maintain strict control over water entitlements. Future water allocation and sewer classification changes must be conditioned upon the developer prioritizing the use of treated effluent ("gray water") and minimizing the use of potable water.

5.3. Long-Term Strategy: Adaptability and Accountability

The regulatory framework must be adaptable and resilient given the rapid evolution of digital infrastructure.

- **Mandatory Biennial Review:** The CDI ordinance must include a requirement for mandatory review on a regular basis (e.g., biannually) to swiftly adjust performance standards to incorporate the newest green technologies and address unforeseen resource impacts.
- **Third-Party Accountability and Enforcement:** To ensure strict environmental adherence, require **3rd party monitoring** of all performance metrics (sound, air quality, water use) and establish impactful enforcement mechanisms. This ensures reliable monitoring and strengthens local environmental protection.

By adopting this layered legal and technical strategy, Frederick County Council can transform the remaining planned data centers into models of sustainable digital infrastructure, minimizing adverse environmental effects while securing long-term economic benefits.

Next email is a draft specific, legally-phrased language for the proposed amendments to the CDI-OZ ordinance regarding the BESS and advanced cooling mandates.

End of Email 1. The Next email is the proposed amendments.

Elyse Wilson

301-639-4072

2799 Decatur Drive Adamstown, MD

From: Elyse Wilson <elysewilsonkhk@gmail.com>
Sent: Thursday, December 11, 2025 11:05 PM
To: Council Members <CouncilMembers@FrederickCountyMD.gov>; County Executive <CountyExecutive@FrederickCountyMD.gov>; Donald, Jerry <JDonald@FrederickCountyMD.gov>; Duckett, Kavonte <KDuckett@FrederickCountyMD.gov>; Carter, Mason <MCarter@FrederickCountyMD.gov>; McKay, Steve <SMcKay@FrederickCountyMD.gov>; Planning Commission <PlanningCommission@FrederickCountyMD.gov>; Young, Brad <BYoung@FrederickCountyMD.gov>; Keegan-Ayer, MC <MCKeegan-Ayer@FrederickCountyMD.gov>; Knapp, Renee <RKnapp@FrederickCountyMD.gov>
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Subject: Draft Amendments to the Critical Digital Infrastructure Overlay Zone (CDI-OZ) Ordinance

Dear Frederick County Council Members and County Executive Jessica Fitzwater,

Here are the detailed, legally-phrased draft amendments for the CDI-OZ ordinance, specifically focusing on the mandates for backup power and cooling systems.

Draft Amendments to the Critical Digital Infrastructure Overlay Zone (CDI-OZ) Ordinance

Proposed Addition to CDI-OZ Performance Standards for Conditional Use Permits

The following standards shall be incorporated into the CDI-OZ ordinance and shall constitute mandatory findings for the approval of any Conditional Use Permit (CUP) application for Critical Digital Infrastructure facilities, pursuant to the local land-use authority to protect the public health, safety, and welfare of Frederick County residents.

Section X.Y. Backup Power System Mandate (Zero-Emission Standard)

All Critical Digital Infrastructure facilities applying for a Conditional Use Permit (CUP) within the Critical Digital Infrastructure Overlay Zone (CDI-OZ) shall adhere to the following backup power standards:

A. Mandatory Zero-Emission Technology (BESS Default Standard):

- 1. Default Requirement:** The primary emergency and backup power system for all new and expansion data center applications shall utilize **Zero-Emission Technology**, defined as systems that produce no on-site air emissions or noise, including but not limited to Battery Energy Storage Systems (BESS) or other energy storage systems capable of meeting NFPA 110 (Standard for Emergency and Standby Power Systems) requirements.
- 2. Required Capacity:** The Zero-Emission Technology system must be sized to meet the facility's full required backup power load, as certified by a licensed professional

engineer, for a duration specified by County regulation (e.g., a minimum of four (4) hours).

B. Restriction and Limitation of Fossil Fuel-Dependent Systems (Diesel Sunset):

1. **Prohibition:** The deployment of new or additional diesel-fired or other fossil fuel-dependent generators as the primary source of emergency backup power is **prohibited** within the CDI-OZ.
2. **Exception (Technical Feasibility):** A Conditional Use Permit applicant may only request an exception to deploy a fossil fuel-dependent backup system if they provide clear and convincing evidence, verified by a qualified, independent third-party engineer approved by the County, demonstrating that Zero-Emission Technology is technically infeasible to meet the mission-critical backup requirements.
3. **Strict Limitation (If Exception Granted):** If an exception is granted, the approved fossil fuel-dependent backup system shall be limited to a maximum of **ten percent (10%)** of the total required backup capacity. Any approved fossil fuel-dependent system must:
 - Utilize the cleanest available fuel technology, prioritizing renewable natural gas (RNG) microgrids.
 - Include a binding **"Diesel Sunset Clause"** within the Conditional Use Permit agreement, mandating the retrofit and replacement of the fossil fuel system with Zero-Emission Technology within three (3) years of the facility's commencement of operations, or sooner if technically viable.

Section X.Z. Cooling System Mandate (High-Efficiency and Resource Conservation)

All Critical Digital Infrastructure facilities applying for a Conditional Use Permit (CUP) within the Critical Digital Infrastructure Overlay Zone (CDI-OZ) shall adhere to the following cooling system standards to ensure future-proofing against technological obsolescence and maximal resource efficiency:

A. Mandatory Advanced Cooling for High-Density Loads:

1. **Performance Standard:** For all computing infrastructure designed to support high-density IT loads (defined as racks exceeding an average of **fifteen (15) kilowatts (kW) per rack**), the facility shall be required to utilize **Liquid-Based Cooling Systems** (including but not limited to direct-to-chip, rear-door heat exchangers, or immersion cooling).
2. **Efficiency Justification:** The CUP application must include a comparative analysis demonstrating that the proposed cooling infrastructure meets an objective Power Usage Effectiveness (\$\text{PUE}\$) target of **1.2 or lower**, or the industry-standard best practice at the time of application, whichever is more stringent.

B. Water Resource Mitigation:

1. **Water Conservation Priority:** The CUP application shall prioritize cooling technologies that **minimize the consumption of potable water**. Applicants must demonstrate a water-use efficiency plan that maximizes the use of treated wastewater effluent ("gray water") for evaporative processes, or, failing that, utilizes high-efficiency closed-loop systems.
2. **Water Allocation Condition:** Any request for new or increased water allocation or sewer classification changes must be explicitly conditioned upon the developer

meeting the efficiency standards established in this Section and entering into a binding agreement to adhere to all County water conservation policies.

Section X.W. Renewable Energy Procurement and Accountability

A. Mandatory Renewable Energy Offset:

1. **100% Offset:** Approval of a CUP shall be conditioned upon the applicant entering into a legally binding agreement to ensure that **one hundred percent (100%)** of the facility's projected electrical energy demand is offset by verifiable renewable energy sources.
2. **Documentation:** This commitment must be documented through either:
 - o Binding long-term **Power Purchase Agreements (PPAs)** for new, local, or regional renewable energy generation.
 - o Verification of equivalent **Renewable Energy Credits (RECs)** that meet strict additionality and geographic criteria as defined by the County.

B. Biennial Review and Accountability:

1. **Mandatory Review:** The provisions of this CDI-OZ ordinance shall be subject to a **Mandatory Biennial Review** by the County Council to ensure performance standards remain current with the rapid evolution of digital infrastructure technology and to incorporate lessons learned from operational facilities.
2. **Third-Party Monitoring:** CUP approvals shall mandate the financing and installation of continuous, third-party monitoring equipment for all required performance metrics (including sound, air quality, water use, and energy consumption), with raw data submitted directly to the County for enforcement purposes.

End of Email 2: Next draft is a framework for the **Community Benefit Agreement (CBA)** to legally manage the Diesel Sunset Clause for the already-permitted phases.

Elyse Wilson

301-639-4072

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Adamstown, MD 21710

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Sent: Thursday, December 11, 2025 11:12 PM
To: Council Members <CouncilMembers@FrederickCountyMD.gov>; McKay, Steve <SMcKay@FrederickCountyMD.gov>; County Executive <CountyExecutive@FrederickCountyMD.gov>; Duckett, Kavonte <KDuckett@FrederickCountyMD.gov>; Donald, Jerry <JDonald@FrederickCountyMD.gov>; Carter, Mason <MCarter@FrederickCountyMD.gov>; Planning Commission <PlanningCommission@FrederickCountyMD.gov>; Keegan-Ayer, MC <MCKeegan-Ayer@FrederickCountyMD.gov>; Knapp, Renee <RKnapp@FrederickCountyMD.gov>; Young, Brad <BYoung@FrederickCountyMD.gov>
Cc: Folden, William Senator <william.folden@senate.maryland.gov>; Lewis Young, Karen Senator <karen.young@senate.maryland.gov>; Pippy, Jesse Delegate <jesse.pippy@house.maryland.gov>; april.miller@house.maryland.gov; Alex Lima -MDE- <alex.lima@maryland.gov>; Jennifer@CharltonCommunications.com; Dustin Branch <dustin@chesapeakeclimate.org>; nanasentuo.bonsu@fox.com; governor.mail@maryland.gov; justin.ready@senate.maryland.gov
Subject: (3) Community Benefit Agreement (CBA) Framework: Diesel Sunset and Green Transition-Frederick MD

[EXTERNAL EMAIL]

Community Benefit Agreement (CBA) Framework: Diesel Sunset and Green Transition-Frederick MD

This framework outlines the necessary contractual components for a CBA between Frederick County and the Critical Digital Infrastructure developer (the "Developer") to secure environmental benefits exceeding minimum regulatory compliance.

1. Preamble and Intent

The CBA shall legally document the Developer's voluntary commitments, recognizing that the Developer seeks ongoing partnership with the County for future phases within the CDI-OZ (e.g., subsequent Conditional Use Permits, water and sewer entitlements) and aims to align with its publicly stated Environmental, Social, and Governance (ESG) goals.

2. Key Environmental Commitment: The Diesel Sunset Clause

The core of the CBA shall be a legally binding commitment to phase out the fossil fuel-dependent backup systems permitted by the Maryland Department of the Environment (MDE) for Phase 1 of the development.

Clause 2.1. Phased Retrofit and Decommissioning Mandate

The Developer shall commit to the phased retrofitting and ultimate decommissioning of the initial diesel generator fleet at the facility located at [Specify Location, e.g., 5601 Manor Woods Road].

- **Technology Replacement:** Within **[3-5] years** from the date the facility commences commercial operations, the Developer shall complete the retrofit of all diesel generators covered by MDE Air Quality Permit-to-Construct [Specify Permit Number(s)] with **Zero-Emission Technology** (specifically Battery Energy Storage

Systems (BESS) or an alternative zero-emission technology approved by the County Council).

- **Decommissioning:** Upon successful deployment and testing of the Zero-Emission Technology, the corresponding diesel generators shall be permanently decommissioned, physically removed from the premises, and certified as such by an independent, County-approved engineer.
- **Timeline Penalty:** The CBA must specify significant, pre-determined liquidated damages (monetary penalties) for failure to meet the specified retrofit timeline, ensuring financial accountability.

Clause 2.2. Interim Emissions Mitigation

Prior to the completion of the Diesel Sunset, the Developer commits to additional localized measures to mitigate the environmental impact of the operational diesel fleet:

- **Enhanced Monitoring:** Continuous, real-time monitoring of NO_x and particulate matter ($\text{PM}_{2.5}$) emissions at the property boundary, with data shared directly and immediately with the County's Department of Environmental Health.
- **Voluntary Testing Limits:** Agree to voluntarily limit the duration and frequency of generator testing (excluding mandated emergency use) to less than the MDE maximum permitted hours per year, particularly during periods of poor air quality or near sensitive receptors.

3. Consideration from Frederick County (The Leverage)

In exchange for the legally binding environmental commitments in Section 2, the County shall provide defined considerations regarding future phases and entitlements.

Clause 3.1. Future Entitlement Review Streamlining

The County agrees to provide the Developer with a streamlined and expedited administrative review process for the following future entitlements, provided the Developer remains in full compliance with all terms of this CBA:

- Subsequent Conditional Use Permit (CUP) applications for Phases 2 and beyond (which must adhere to the new, stringent CDI-OZ green mandates).
- Requests for Zoning Map Amendments or text amendments related to the CDI-OZ boundary expansion (if applicable).
- Requests for modifications to Water and Sewer Classification Categories and/or allocation of non-potable (gray) water resources.

Clause 3.2. Regulatory Certainty

The CBA shall provide the Developer with a defined level of regulatory certainty regarding the application of the new CDI-OZ performance standards (BESS and advanced cooling mandates) to their future planned phases, ensuring consistency throughout their campus build-out.

4. Enforcement and Oversight

Clause 4.1. Independent Auditing

- **Compliance Verification:** The Developer shall fund a mandatory, annual, independent third-party audit—selected and managed by the County—to verify compliance with the terms of the Diesel Sunset Clause and the interim emissions mitigation measures.
- **Reporting:** Audit results shall be made public and submitted directly to the Frederick County Council.

Clause 4.2. Dispute Resolution and Default

- The CBA must establish clear procedures for dispute resolution (e.g., binding arbitration).
- Specify that failure to remedy any breach of the CBA within a defined cure period (e.g., 90 days) shall constitute a **Default**, giving the County the right to immediately suspend processing all pending and future discretionary entitlements for the entire data center campus (e.g., denying Phase 2 building permits, withholding water allocation approvals).

End of Email 3

Best regards,

Elyse Wilson

2799 Decatur Drive

Adamstown, MD 21710

From: Valerie Fox <vee41582@gmail.com>
Sent: Tuesday, December 9, 2025 11:47 AM
To: Council Members <CouncilMembers@FrederickCountyMD.gov>; County Executive <CountyExecutive@FrederickCountyMD.gov>; Planning Commission <PlanningCommission@FrederickCountyMD.gov>
Subject: Data Center CDI Frederick County Opposition

Dear Council Members and County Leadership,

I'm writing again as a lifetime Frederick County resident and active voter **in strong opposition to the expansion of the CDI data center overlay in Adamstown**. It's a land grab in disguise that will set a dangerous precedent.

I've attached mailers that have been received by friends in the northern part of the county, promoting the data center overlay zone. When I saw them I felt sick to my stomach. I've attached them here if you have not seen or received them at your homes. Lobbyists are fighting hard to get buy-in and are not telling the whole story. They have a major advantage in the amount of funds and resources they can commit to promoting this project. As an engaged voter, I will be closely watching how each individual Council Member votes on this issue, and I will act accordingly in future elections. We are all paying attention. I ask all of you to please fight for us and our cherished home.

The risks of the decision to expand this zone poses irreversible risks that will impact Frederick County families for generations to come.

The Planning Commission's recommendation was clear and responsible: keep data centers within the already-approved Eastalco footprint and do not expand the growth area. I strongly urge you to uphold that decision.

This is not strategic growth. It's industrial sprawl that will permanently reshape our communities. We've seen the impacts that other counties locally have experienced, resulting in large scale environmental stress, public dissatisfaction and trust- all while generating MINIMAL long term economic or civic benefit.

We deserve strong oversight measures. Frederick County is a beautiful place and has a strong agricultural base that deserves to flourish. It's important that we be stewards of the land for current and future generations.

Data center sprawl is not what we want or need in Frederick County. We are not a sacrifice zone for commercial interests.

For all these reasons, I respectfully ask you to **reject any expansion of the CDI Overlay** beyond what is already approved. The environmental, economic, and community consequences are too great and too uncertain to justify. The Planning Commission made the right call. Please follow their sound, well-reasoned recommendation.

Thank you as always for your time and service to the people of Frederick County.

Thank you,

Valerie Fox
8306 Brookmere Blvd
Frederick, MD 21702

DATA CENTERS MEAN MORE JOBS CLOSE TO HOME

BOOSTING LOCAL CONSTRUCTION WORKERS:
During construction, the Eastalco data center campus will create 8,100 jobs for local construction workers, many of whom currently commute far from home to find work.¹

POWERING PERMANENT FREDERICK COUNTY JOBS:
Once fully operational, the campus will create about 9,800 permanent jobs, from skilled trades like engineers and electricians to tech professionals.¹

KEEPING OUR WORKERS IN FREDERICK COUNTY:
For thousands of working families in Frederick County, these local jobs mean higher wages, hours saved on commutes, and finding meaningful work where they belong — close to home.

SUPPORTING LOCAL SHOPS AND RESTAURANTS:
More jobs at the Eastalco site means more money is spent in our community — at local shops and restaurants — ensuring the economic benefits are enjoyed by all.

DATA CENTERS CAN HELP REDUCE CLASS SIZES, INVEST IN GREAT TEACHERS

MARYLAND'S BEST SCHOOLS—WITHOUT RAISING TAXES:

Frederick County can be home to Maryland's best schools—without raising taxes. The new data center campus at the old Eastalco industrial site will provide a game-changing tax revenue boost that can help the county fully fund schools and give every student the education they need to build a bright future.

NEW FUNDING FOR EXCEPTIONAL TEACHERS:

Frederick County's teachers ignite curiosity and open students' eyes to possibility. Tax revenue from the Eastalco data center campus will provide new funding needed to help retain and attract exceptional teachers to every Frederick County classroom.

STEADY SCHOOL FUNDING FOR DECADES TO COME:

The Eastalco data center campus has already provided \$35 million in tax revenue to build new schools and reduce class sizes. It will also generate an estimated \$215 million in annual county tax revenue once operational.¹ If half of those funds are invested in the county's public schools, they could fund the equivalent of more than 1,800 teacher starting salaries every year.

 **DATA CENTER**
ALLIANCE OF MARYLAND
Powered by the Maryland Tech Council

FREDERICK JOBS FOR FREDERICK FAMILIES

 **DATA CENTER**
ALLIANCE OF MARYLAND
Powered by the Maryland Tech Council

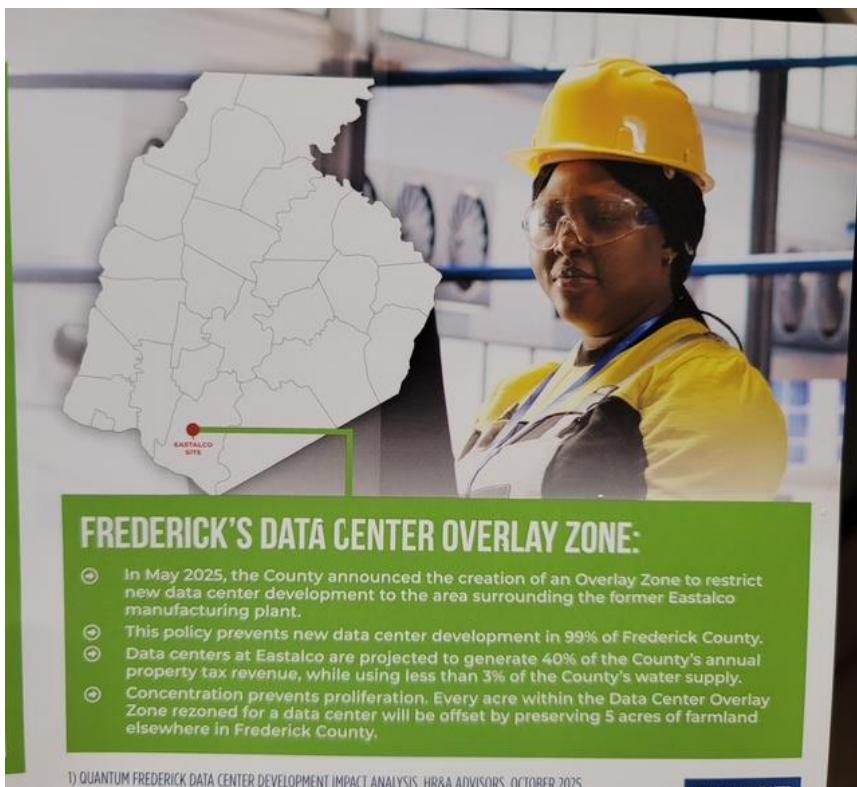
OUR KIDS DESERVE THE BEST.
NOW THEY CAN GET IT.



FREDERICK'S DATA CENTER OVERLAY ZONE:

- ④ In May 2025, the County announced the creation of an Overlay Zone to restrict new data center development to the area surrounding the former Eastalco manufacturing plant.
- ④ This policy prevents new data center development in 99% of Frederick County.
- ④ Data centers at Eastalco are projected to generate 40% of the County's annual property tax revenue, while using less than 3% of the County's water supply.
- ④ Concentration prevents proliferation. Every acre within the Data Center Overlay Zone rezoned for a data center will be offset by preserving 5 acres of farmland elsewhere in Frederick County.

1) HR&A ADVISORS QUANTUM FREDERICK ECONOMIC IMPACT ANALYSIS, OCTOBER 2025



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1) QUANTUM FREDERICK DATA CENTER DEVELOPMENT IMPACT ANALYSIS, HR&A ADVISORS, OCTOBER 2025



From: Bill Stup <wstup@aol.com>
Sent: Tuesday, December 9, 2025 3:04 PM
To: Council Members <CouncilMembers@FrederickCountyMD.gov>
Subject: Stup Farm Overlay

[EXTERNAL EMAIL]

Dear County Counsel Members,

I am writing to clear up some confusion regarding the status of our farm (see attachment). Our family has lived and worked this land for generations, and I want to provide some context that underscores our deep connection to Adamstown.

I was born and raised on our farm, and my Great Grandmother was a Thomas. Our family's roots in this area go back much further than many of those now raising complaints. This land is not simply property to us—it is heritage, stewardship, and responsibility.

I also recall when no one in Adamstown wanted Green Hill Manor or The Commons. I remember when the Adamstown area was primarily dairy farms. Change is inevitable, but the key lies in managing it responsibly. Our family has always embraced stewardship and thoughtful growth, and we continue to advocate for fairness and balance in how change is handled.

I hope this helps clarify our position and reinforces the importance of recognizing both the history and the future of our farm within the broader community.

Sincerely,
William (Bill) Stup

3607 Howard Stup Rd
Frederick, Md 21703
240-674-3141

Dear County Counsel,

My grandfather purchased our farm in 1944. When he passed away suddenly in 1959 at the age of 56, my father—only 23 years old—was left to take over. Farming was the only life he knew. While his five sisters pursued their own careers, my father stayed behind, renting the farm and purchasing all the livestock and equipment from my grandmother so she could retire.

When my grandmother passed in 1993, my aunts wanted the farm sold to collect their inheritance. My father, still too young to retire and with no savings after decades of farming, paying off his mother, and raising four children, could not afford to buy the farm outright. He even sold the house he had built himself to my sister, but it still wasn't enough.

At that point, my wife discovered government programs designed to help farmers preserve their farms. My father entered MALPF reluctantly but in good faith, under the understanding that repayment with interest would allow us to exit if circumstances ever permitted. For decades, our family relied on that belief in making decisions about our farm and our future.

With the arrival of data centers and our neighbors included in the overlay, we put our name forward as well. We have houses on the farm, and the overlay does not help our property values. Rather than fight, we sought a win-win solution: if land values are high enough, we could repay the State, and the State could use those funds to preserve even more farmland.

We never pursued leaving MALPF before because we didn't think we could afford it. But with today's land prices, repayment seems possible—and fair. Our family has carried this farm through generations, often at great personal sacrifice. We believe the State should honor the original understanding that repayment with interest allows farmers to exit the program. Anything less is either a broken promise or a failure of communication that undermines fairness.

It is important to note that our farm is not in perpetuity. My parents signed up with the State in November of 2003—a year before the current MALPF program went into effect. With the money the State would receive from our repayment, it could purchase additional farmland in Frederick County, furthering the preservation mission.

Finally, we believe our farm ties in naturally with the Giesinger, Noffsinger, and Butz farms to create a landscape that affects the least number of people in Frederick County for the Overlay.

Respectfully,

Bill Stup

3607 Howard Stup Rd

Frederick, Md 21703

From: Nick Carrera <mjcarrera@comcast.net>
Sent: Wednesday, December 10, 2025 2:19 PM
To: Council Members <CouncilMembers@FrederickCountyMD.gov>; County Executive <CountyExecutive@FrederickCountyMD.gov>
Cc: Planning Commission <PlanningCommission@FrederickCountyMD.gov>; Carrera, Nicholas <mjcarrera@comcast.net>; Carrera, Alexandra <sasha.carrera@gmail.com>; Carrera, Johnny <johnnyquercus@me.com>
Subject: Comments on CDI Overlay

County Council Members and County Executive Fitzwater,

I've seen no study from the county on net financial benefit to the county from data centers. The issue is an important one, affecting our budget and the general well-being of the county, so I've made an attempt, using what skimpy data are available to me. You can see the results in my attachment (and copied below).

It should be clear enough from my comments, but I emphasize a few points. The "economic damage" loss of about \$162 M that was presented by Peter Michael, in Council comments and in the *FNP*, is a real cost to the county. The wide divergence between Sage and HR&A results means that, without determining why they differ, you can't trust either study. The financial results I derived, based on shaky input as they are, are inadequate for planning purposes; nevertheless, the fact that they are strongly negative should be a strong cautionary signal for Council Members and for CE Fitzwater. I know we are already committed to some data centers; the question is, "How many?" My results argue for a minimal approach -- "If you're already in a hole, the first thing is to stop digging deeper!" Unless the Council has access to good data that show you can expect a net and significant positive financial benefit for the county, it's prudent to take a minimal approach before jumping in with both feet.

Attachment: Comments in anticipation of the 12/16/25 County Council meeting

Best holiday wishes,

Nick Carrera; 2602 scenic Thurston Road, FREDERICK County

I am copying the text of the attachment below, as part of this email, in case that allows easier access.

Comments related to meeting of the County Council 12.16.25 Rev 3
Submitted by Nick Carrera, 2602 Thurston Road, FREDERICK County
(This is my home and where I live full-time; it is not an office or a "doing business at" address.)

Data Center Finances – Will Costs Outweigh Revenue?

Summary: Estimated data center revenue will be \$41 M (Sage study) or \$215 M (HR&A study). Estimated costs for infrastructure and economic damage will be over \$233.5 M (using Sage jobs estimate) or over \$273.4 M (using HR&A jobs estimate). This implies that net financial outcome could be a loss of roughly \$60 M or \$200 M. The wide difference indicates that these estimates, in particular the revenue estimates, are unreliable for planning purposes. This is reason enough for concern, but it is alarming that the entire range of net financial outcome is negative. A prudent approach would be a minimal commitment for now, to see how data centers will actually work out.

Revenue estimates: There are two estimates for annual revenue from the completed Quantum project. Sage Policy estimated \$41 million. HR&A Advisors estimated \$215 million. Such a spread shows one or both figures are erroneous, so an average is meaningless and useless for planning.

Cost estimates – Infrastructure: In absence of a study by the county, Steve and Blanca Poteat used the same methodology the county uses, to estimate infrastructure costs from new jobs, once construction is finished. Job estimates were from Sage (6300 new jobs) and HR&A (9800 new jobs). The resulting infrastructure cost estimates are \$71.5 M (Sage) and \$111.4 M (HR&A).

Other costs: In the "As I see it" column in the 10/15/25 *Frederick News-Post*, Peter Michael of Michael Strategic Analysis discussed loss of property value from large industrial installations. For example, properties within about one mile get lower valuations and the county collects lower property taxes. Michael estimated that "economic damage" from the data centers would be about \$162 M. Electric bills are rising due to data centers and their appetite for energy. The cost for more energy sources and transmission lines is passed to all rate-payers, including counties. Cost to Frederick County could be substantial, but I've found no estimated figure.

Net financial outcome:

Estimated from Sage data: revenue \$41 M; costs \$71.5 M + \$162 M. **Net loss: \$192.5 M**

Estimated from HR&A: revenue \$215 M; costs \$111.4 M + \$162 M. **Net loss: \$58.4 M**

Environmental costs: We have examples from Virginia, where data centers are noisy, use large amounts of water and electricity, and add to greenhouse gases. They dominate large areas, are visually overpowering, and mostly unattractive. Their power lines are disruptive and offensive. Buddy Rizer, who has overseen their growth in Loudoun County, told our Data Centers Workgroup, "If there's anything the citizens like less than the data centers, it's the power lines."

Comments: The disparate estimates of revenue and costs quoted above give the county no reliable estimate for the net financial benefit from data centers. Speakers at Council meetings have repeatedly called for a county study of *net* financial benefits, i.e., both revenue and costs. They have been ignored, and the county has no assurance that data centers will even be a net gain. Any prudent businessman or responsible public official would want to "go slow" in such a situation.

File: Documents > County Council 12.16.25 Rev 3

From: Mark Sankey <markrsankey@gmail.com>
Sent: Thursday, December 11, 2025 3:49 PM
To: Council Members <CouncilMembers@FrederickCountyMD.gov>
Cc: County Executive <CountyExecutive@FrederickCountyMD.gov>; Venable, Victoria <Venable@FrederickCountyMD.gov>
Subject: CDI Overlay - The final Round

[EXTERNAL EMAIL]

Attached are my thoughts. God bless you all during the holidays. May you enjoy time with family, friends and all that our community offers.

Mark Sankey
Frederick, MD

CDI Policy and the Overlay

I do not hesitate to thank you all again for your service to the community. The more we see one another as people we can serve, the healthier our community will be. The issue of data centers has brought out the best, and some of the worst in us. Bearing with the lower tendencies of our humanity is one of our greatest challenges. I pray for our collective self-control.

We are now at a critical point in the process of managing data center development. Revenue is needed and this industry driven by AI is accelerating with the promise of significant revenue. For me very personally, the long term benefits are not worth the detriments to our mental and creative development and harm to the natural environment. But your responsibility to the community goes beyond my perspective. You need to weigh many factors and I will continue to support you no matter the decision on the size of the overlay.

My objective view of the size of the overlay aligns with the recommendation of the Planning Commission. This is based solidly on the current community impact of data center construction, long term environmental cost and actual expected long term revenue. Impact on the overall quality of life including energy costs and environmental impact cannot be ignored. Yes, while construction continues, employment will be at a very high level. But are all those workers Frederick County residents and taxpayers? I think not. The revenue is still significant. However we should not be fooled by self-serving economic analyses. The long term employment benefit for each data center building is no greater than a Chick-Fil-A. That is a realistic comment, not hyperbole. Many projections of employment within data centers is ridiculous.

Long term revenue is no greater than other comparable industries. That revenue would be greater should a specific property tax be in place but we recognize that is uncertain at best. Other industries have greater long term benefit than AI and its offspring. AI increases speed of information collection and can speed analysis if used by experienced persons. AI also is revealing its awful ability to outright deceive. I hope for us to encourage more beneficial industries which can provide equivalent levels of revenue.

I write this to encourage limits to the overlay for the present. It will take years to fully build out the zone as recommended by the Planning Commission. While some would want to avoid going through this process again in say 5 years, the decision to commit all the larger area now is a commitment to its use for data centers. In my view, that is not the best choice for the long term. Allow the larger area to be available for other industries when it makes sense. Limit the overlay zone to the Planning Commission proposal.

From: Carolyn Coelho <carolynlouisecoelho@gmail.com>
Sent: Friday, December 12, 2025 4:08 PM
To: Duckett, Kavonte <KDuckett@FrederickCountyMD.gov>; County Executive <CountyExecutive@FrederickCountyMD.gov>; McCarthy, Kathan <KMcCarthy@FrederickCountyMD.gov>; Cherney, Ragen <RCherney@FrederickCountyMD.gov>
Subject: Fwd: Stop the Data Center Expansion and Diesel Generators

----- Forwarded message -----

From: **Carolyn Coelho** <carolynlouisecoelho@gmail.com>
Date: Fri, Dec 12, 2025 at 4:04 PM
Subject: Stop the Data Center Expansion and Diesel Generators
To: <jfitzwater@frederickcountymd.gov>

Jessica, Council Members, Kavonte,

I am a 30 year resident of Adamstown and I strongly oppose the expansion of the Data Center and the request for the diesel generators.

The Data Center is a blight on our community. It will destroy our home values, increase our electricity bills, steal our water resources, and pollute our community.

If you let this continue, you will be complicit in poisoning children and wildlife. This egregious decision is ruining my enjoyment of my home and community.

It must be nice for you to return to a home each day that does not contain a Data Center. It must be nice for your children to attend a school that is not being poisoned by one. I wish I could say the same.

I will never vote for you or any politicians who approves of this. Amazon is not a lifelong resident of Frederick County. Their investment is self-serving. They will abandon Frederick when we are no longer profitable, and you will have nothing to show for it. They are not part of this community and we were fine before they came.

Please do not approve the expansion or the generators.

-Carolyn Coelho



Adjacent Property Owner-Public Hearing

From Mason, Jeanne K <jeanne_mason@baxter.com>

Date Fri 12/12/2025 6:07 PM

To Council Members <CouncilMembers@FrederickCountyMD.gov>

Cc Dale Mason <bdalemason@AOL.com>; jeannekmason@comcast.net <jeannekmason@comcast.net>

1 attachment (78 KB)

Scanned from USOPPW1COPY17 a Xerox Multifunction Printer.pdf;

[EXTERNAL EMAIL]

Jessica Fitzwater,

As an Adjacent Property Owner potentially impacted by Proposed Amendments, I have provided written comments, in the file below, for the hearing on December 16th.

Thank you for considering and including my comments.

Regards, Jeanne Mason

Jessica Fitzwater
County Executive
Frederick County Government
Division of Planning & Permitting

Re: Public Hearing on the Critical Infrastructure Overlay Zone - Tuesday, Dec. 16, 2025
Concerns regarding Property Owner request (Horman) for Inclusion in the Overlay Zone

Dear Ms. Fitzwater,

We are the property owners at 4800 Ballenger Creek Pike, which is adjacent to the property named Horman. The Horman property is in front of our farm and our home. We are deeply concerned by the possibility of the Horman property being rezoned to light industrial and the effect this will have on the area surrounding our home, our farm and our neighborhood. Light industrial development can increase traffic, congestion, pollution, and the potential for crime. We would like you to please consider these variables as you evaluate our request to deny the inclusion of the Horman property in the Overlay Zone:

1. Consistency with the Comprehensive Plan – the Horman property was not in the original plan. The amount of acreage (1,585.8) already specified for the CDI should be more than sufficient for the foreseeable future development. Adding this additional property and rezoning at Light Industrial does not benefit or service the community and diminishes the tranquility of the surrounding farmland area.
2. Availability of current planned facilities (roads/utilities) – Given the “country road” nature of Ballenger Creek Pike in front of our property, this road would be insufficient to handle the addition of an entrance(s) for Light Industrial activity. The proximity to our farm and the other surrounding farms would prevent road expansion. It would be a huge traffic bottleneck directly in front of our farm.
3. Compatibility with existing farmland – on the 74 acre farm we own at 4800 Ballenger Creek Pike, we are producing hay. Additionally, we have stables for horses. A busy light industrial development is not compatible with our farmland or the other farms that are adjacent to or near the Horman property.

My husband and I feel very fortunate to own a beautiful farm in Frederick County. I was born and raised in Frederick and there have been many Kefauver farms in the County. My grandfather, Rhea Kincaid, worked for the County many years ago in Soil Conservation and taught me the importance of farmland. So, we greatly appreciate the value of preserving the agricultural heritage of Frederick County and Maryland. We also appreciate the importance of development and progress and believe both have a place and value. We also believe that there is a sufficient amount of land and farms already included in the Critical Data Infrastructure (CDI) Zone. There is no benefit to the community to rezone the Horman Property to Light Industrial. And, in fact there is a meaningful detriment to our

farm and the surrounding farms and neighbors that far outweighs a request to rezone additional property. Therefore, we respectfully request that you deny the inclusion of the Horman Property in the Overlay Zone.

Regards,

Jeanne Kefauver Mason
4800 Ballenger Creek Pike
Frederick, MD 21703
Jeannek Mason@comcast.net



Public hearing: Data Center Overlay

From Lauren Bello <sportobello95@hotmail.com>

Date Fri 12/12/2025 5:13 PM

To Council Members <CouncilMembers@FrederickCountyMD.gov>

[EXTERNAL EMAIL] Good evening, I am writing to express my concerns and outrage regarding the proposed data center expansion in Adamstown. There are real and direct concerns to the neighbors, schools and local residences that are not being adequately addressed. Where is the due diligence to ensure that folks who live, work and learn in the adjacent and surrounding areas will be safe and unaffected? Where are the guarantees regarding water, air and soil safety? How are the staff and students of Carroll Manor ES being protected? How will the general public be able to monitor the air and water quality changes? How will our electric bills be affected? It is irresponsible to move forward until these questions can be adequately answered and safety guarantees put into place. Thank you for your attention. Lauren Bello Sent from my iPhone



Quantum Frederick concerns

From Dedra Salitrik <dedrasalitrik@gmail.com>

Date Fri 12/12/2025 4:32 PM

To Council Members <CouncilMembers@FrederickCountyMD.gov>

[EXTERNAL EMAIL]

Frederick County Council members:

I'm a Frederick County resident with huge concerns about the impact of the 92 backup diesel generators planned as backup power sources for the Quantum plant. My concern is due to the water and air pollution that will be caused by them. Our climate in Frederick and the health of the people and wild residents who live here will be severely and dangerously impacted by the pollution these generators will cause.

I'm writing to ask that you vote NOT to allow these generators to be added to the already fragile environment we live in. An alternative, more climate friendly method of producing power, needs to be identified. The Quantum Frederick data center will emit more than enough noise and other negative impacts including pollution without adding the diesel generators.

Sincerely,
Dedra Salitrik



Request for Review of Attached Letter – CDI Overlay Zone Consideration

From Paul Serio <arnolddeveloper@gmail.com>

Date Fri 12/12/2025 3:43 PM

To Council Members <CouncilMembers@FrederickCountyMD.gov>; Donald, Jerry <JDonald@FrederickCountyMD.gov>; Luna, Nancy <NLuna@FrederickCountyMD.gov>; McKay, Steve <SMcKay@FrederickCountyMD.gov>; Redmond, Lee <LRedmond@FrederickCountyMD.gov>; Keegan-Ayer, MC <MCKeegan-Ayer@FrederickCountyMD.gov>; Duckett, Kavonte <KDuckett@FrederickCountyMD.gov>; Carter, Mason <MCarter@FrederickCountyMD.gov>; Young, Brad <BYoung@FrederickCountyMD.gov>; Grabowski, Sarah <SGrabowski@FrederickCountyMD.gov>; Knapp, Renee <RKnapp@FrederickCountyMD.gov>

1 attachment (2 MB)

Arnold - 4315 Ballenger Creek Pike - CDI Overlay request.pdf;

[EXTERNAL EMAIL]

Dear Frederick County Council Members,

Please find attached a letter respectfully requesting the inclusion of the property located at 4315 Ballenger Creek Pike, Frederick, MD (SDAT Account #01-002341, 104.2 acres) in the proposed Critical Digital Infrastructure (CDI) Overlay Zone.

I kindly ask that you review this letter for consideration during the upcoming Frederick County Council hearing scheduled for December 16, 2025.

Thank you for your time and thoughtful consideration of this matter. Please feel free to contact me if you need any additional information or documentation.

Best regards,

--
Paul Serio

Arnold Developer Associates, Inc.
410-340-5660
arnolddeveloper@gmail.com

December 12, 2025

Frederick County Council
12 East Church Street
Frederick, MD 21701

Subject: Request for Inclusion in Proposed Critical Digital Infrastructure (CDI) Overlay Zone

Dear Members of the Frederick County Council,

I am writing to respectfully restate my request for the inclusion of the following property in the proposed Critical Digital Infrastructure (CDI) Overlay Zone, and to emphasize that this request should be considered at the upcoming Frederick County Council Legislative Meeting scheduled for December 16, 2025:

- **Property Address: 4315 Ballenger Creek Pike, Frederick, MD**
- **SDAT Account Number: 01-002341**

The inclusion of this property in the CDI Overlay Zone is essential at this time to allow the community, property owners, and potential developers to adequately plan for the future of Frederick County.

I have attended workshops hosted by both the Frederick County Planning Commission and the Frederick County Council to better understand the concerns and significance of the proposed overlay zone. As shown on the attached map, the subject property, labeled as "Arnold" is adjacent to the former Eastalco property along the southern boundary. The eastern boundary abuts both the Eastalco property and the NDR Properties parcel—both of which are currently under consideration. The entire western boundary runs along Ballenger Creek Pike, while the northern boundary is wooded, separating seven adjacent residential parcels.

Inclusion in the overlay zone represents a practical initial step to allow potential future uses of this property to be contemplated. This inclusion does not change the underlying zoning or eliminate the need to address future setback requirements, buffers, and other considerations before any significant changes occur. Rather, it enables smart planning for the future of this property, surrounding area, and Frederick County.

Additionally, I urge the Council to recognize the significant economic benefits that Frederick County can realize by capitalizing on the data center industry and its continued expansion. This sector represents a critical opportunity for job creation, tax revenue, and

long-term economic growth. The inclusion of the subject property should be considered as proactive planning will ensure Frederick County remains competitive and well-positioned to attract investment in this rapidly growing industry.

The proposed overlay zone is a forward-thinking approach to forecasting infrastructure needs and ensuring Frederick County is prepared to seize opportunities in an industry that shows no signs of diminishing.

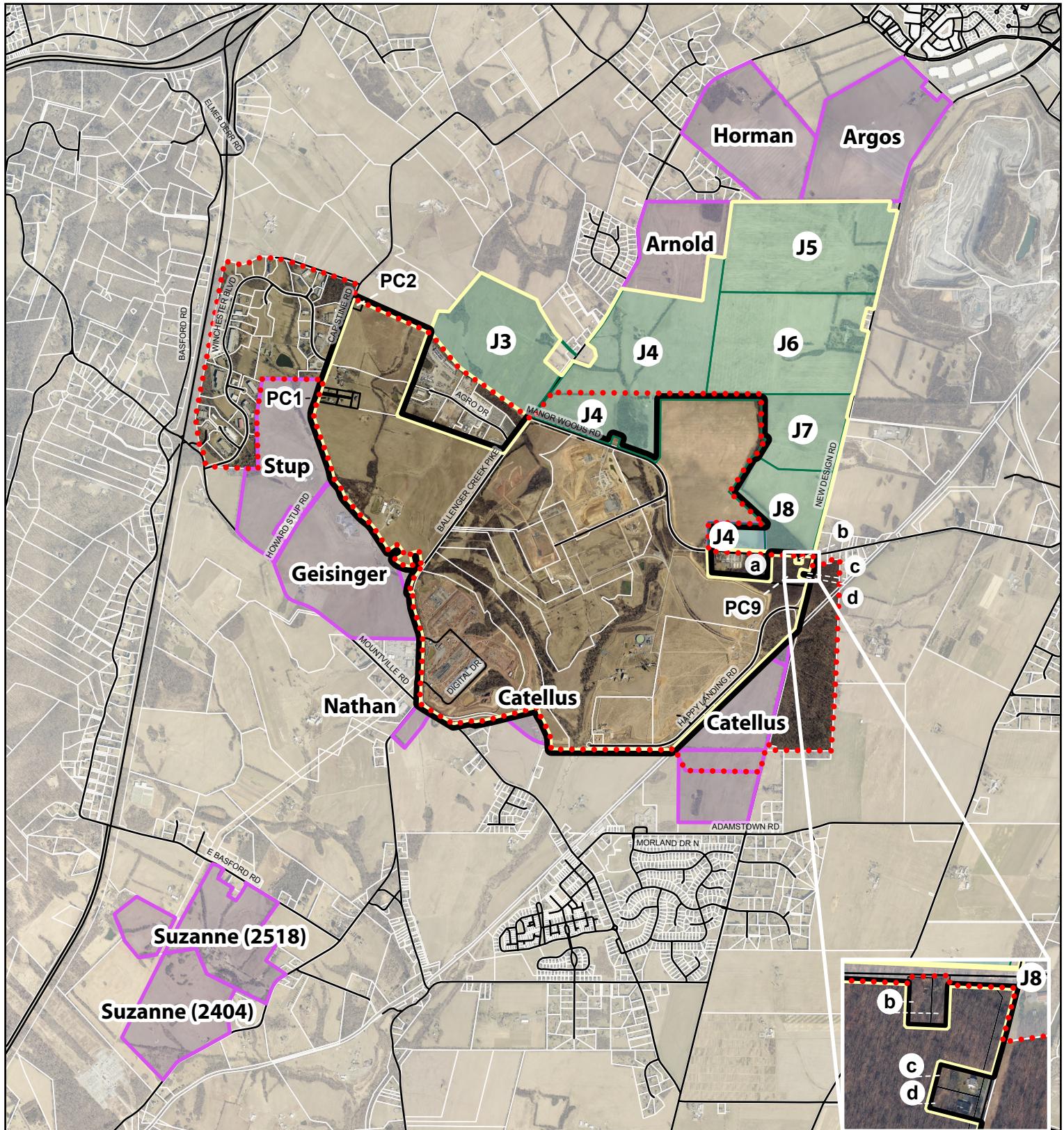
Thank you for your consideration of this request and for your commitment to planning responsibly for the future of Frederick County. Please feel free to contact me if you require additional information or documentation.

Sincerely,



Paul Serio

Arnold Developer Associates, Inc.
410-340-5660



Map A- Potential Critical Data Infrastructure (CDI) Overlay Zone Council Consideration

Legend:

- Frederick County Planning Commission(FCPC) July Draft Areas
- Property Owner Request Areas for Inclusion in the Overlay Zone
- FCPC Recommended CDI Overlay Zone
- FCPC Recommended Community Growth Area

FCPC CDI Acres	FCPC CDI % of County
1,585.8	0.37

Projection: NAD 1983 State Plane Maryland FIPS 1900 Feet
 While efforts have been made to ensure the accuracy of this map, Frederick County accepts no liability or responsibility for errors, omissions, or positional inaccuracies in the content of this map. Reliance on this map is at the risk of the user. This map is for illustration purposes only and should not be used for surveying, engineering, or site-specific analysis. Printed 11/17/2025

0 0.25 0.5 1 Miles

MAPID:540

Argos Parcel Inclusion in CDI Overlay and Rezone Request

From Eric Leigh - DEN <Eric.Leigh@quikrete.com>

Date Wed 12/10/2025 11:46 PM

To Gaines, Kimberly <KGaines@FrederickCountyMD.gov>

Cc Stewart Lamb <Stewart.Lamb@Quikrete-Materials.com>

 1 attachment (101 KB)

Argos - Frederick, MD Parcel - Inclusion in CDI Overlay and Rezone Request.docx;

[EXTERNAL EMAIL]

Hello Kim,

Please find attached a letter requesting a rezone of the "Argos" parcel as noted on the staff map for the proposed CDI Overlay. I will be present at the County Council meeting next Tuesday for comments/questions. Looking forward to the discussion. Please let me know if you have any questions ahead of the meeting.

Thank you for your time and consideration.

Eric

Eric Leigh

Acquisition, Land, and Development

QUIKRETE

5 Concourse Parkway Suite 1900

Atlanta, GA 30328

M. 720-289-5584

W. www.quikrete.com





Quikrete Construction Materials

5 Concourse Pkwy, Suite 1900

Atlanta, GA 30328

December 10, 2025

Kimberly Gaines
Livable Frederick Director
30 North Market Street
Frederick, MD 21701

Attention: Kimberly Gaines

Subject: Inclusion of Argos 175-Acre Parcel in Proposed CDI Overlay Zone and Rezone to General Industrial.

Dear Ms. Gaines:

Quikrete Construction Materials, LLC (f/k/a Argos USA, LLC), a subsidiary of Quikrete Holdings, Inc. owns a ~175-acre parcel on the SW corner of the intersection of New Design Rd and Harshman Way, identified on the planning staff map as "Argos". Quikrete has already requested that this parcel be included in the proposed Critical Data Infrastructure Overlay Zone and has met the public notice requirements per the County's instructions ahead of the upcoming Council meeting on Dec 16. In addition to inclusion in the overlay zone, Quikrete would like to request that the existing zoning be changed from Agricultural to General Industrial (GI). After reviewing the CDI Overlay ordinance and the land use code, it appears that this is a necessary step to accommodate the future construction of a data center or associated infrastructure.

This parcel has been owned by a mining and construction materials producer for over 40 years and contains a substantial limestone aggregate resource. The intent of the owner has been to recover that limestone to produce crushed stone for consumption in the County. However, Quikrete is willing to consider that the highest and best use of the land may instead be for the construction of data centers and/or supporting infrastructure.

Quikrete and its tenants on the property are already supplying many of the materials needed for the construction of these data centers. As a long-time responsible community member and with our proximity to the Eastalco project, we are working with some of the contractors to determine how we can help reduce the impact of construction on the surrounding communities and residents.

We appreciate the Council's consideration on this matter, and I look forward to being available in person at the meeting next week.

Sincerely,

QUIKRETE CONSTRUCTION MATERIALS, LLC (F/K/A ARGOS USA, LLC)

Name: Eric Leigh
Title: Manager – Acquisition, Land, and Development
Date: December 10, 2025



AI and jobs loss

From Matthew Moran <monocacybottommatt@gmail.com>
Date Sat 12/13/2025 9:55 AM
To Council Members <CouncilMembers@FrederickCountyMD.gov>

[EXTERNAL EMAIL]

Good morning esteemed council members,

I hope you all are keeping warm and cozy as we approach the holidays.

Please keep in mind that data centers are not necessarily a panacea for employment. In fact, the artificial intelligence (AI) created in data centers may eliminate far more jobs than it creates in the long run. While a few jobs may be created as a result of AI, many more jobs are likely to be replaced by AI.

A Stanford University study has found that **artificial intelligence has already eliminated a lot of jobs, especially for young people** seeking entry level jobs and that " if we listen to Ford CEO Jim Farley, half of all white collar jobs are at risk."

(<https://www.forbes.com/sites/johnkoetsier/2025/08/26/ai-kills-jobs-says-stanford-study>) Since the widespread release of ChatGPT in 2022 we have been witnessing a widespread decline of entry level employment.

The Wall Street Journal has reported that corporations are just now beginning to talk about the **jobs that will be replaced** and it is staggering. (<https://www.wsj.com/tech/ai/ai-white-collar-job-loss>)

Please consider all the jobs that will be lost as a result of the AI created by data centers.

Thank You,

Matt Moran
Monocacy Bottom Road, Adamstown



CDI overlay bill

From David Burrier <burrierfarmsred@gmail.com>
Date Sun 12/14/2025 11:30 AM
To Council Members <CouncilMembers@FrederickCountyMD.gov>
Cc Belinda Burrier <burrierfarmsred@outlook.com>

[EXTERNAL EMAIL] President Young, Vice President Duckett, and fellow council members, Frederick County Farm Bureau supports the overlay recommendations by the Frederick County Planning Commission. Our concerns with the overlay bill remain with the boundaries of the State certified Priority Preservation Areas (PPI) which will require recertification of Fredrick County agricultural programs. These programs could come under review and reduce our percentage of transfer tax from 75% to 35%. It was stated by staff that this review will not affect our certification status , but in reality there is no indication by the State that this is true since it has not been tested until now. This is more critical to Frederick County Land Preservation than ever before since MALPF was greatly reduced last year to meet budget short falls. In preview, it looks like the tough financial climate will continue into this current fiscal year, which means there will be no reprieve of funds to support our State ag preservation efforts. Also, any expansion of the industrial zoned land will challenge land that lies in the Rural Legacy Area. The Rural Legacy programs' goal is to protect and preserve large, contiguous tracts of rich agricultural land from sprawling development. Expansion of the existing industrial zoned land into these parcels will fragment the Rural Legacy Area. Since 2003, the Rural Legacy Area has protected the land, natural resources, history and view shed of Adamstown. Before this designation can be changed, it must be heard before the State board for Rural Legacy Preservation. The land designated for the CDI overlay bill by the planning commission will give the county revenue to move planned projects and programs forward. Also, concerns regarding power and water sources will be more readily met. As this project moves forward in our county, please consider the consequences of Fredrick County losing its eligibility of revenue for our successful farmland preservation from the State agricultural transfer taxes. The Rural Legacy and the PPA areas were selected to maintain a large number of properties to protect these high quality soils that cannot be duplicated anywhere else in Frederick County. Fredrick County agriculture is currently challenged with many demands for farmland acres, and the loss of more preservation funds could limit our industry forever. During the workshop two weeks ago, a council member made the statement that the council was flying the plane while they were building it. This statement is likely more correct than many other comments tonight, but should signal ere to caution as this moves forward. In conclusion Fredrick County Farm Bureau strongly urges the County Council to follow the recommendation of the planning commission. Dave Burrier, President Frederick County Farm Bureau



Data Center Development

From Giuseppe Savona <jdsavona@aol.com>

Date Sun 12/14/2025 11:38 AM

To Council Members <CouncilMembers@FrederickCountyMD.gov>

[EXTERNAL EMAIL] Dear Council Members I will keep my comments brief. Before expansion of agricultural lands to additional data center development, I believe the County should assess the emerging data center campus impacts on the County, environment, and its utilities (power, water etc) before it expands the area available for future development. I do not believe it's prudent to expand the area without understanding the effects of the existing or planned projects. Secondly. I'm currently opposed to the MPRP power line which will run within 500 yards of my home. Do we have any idea what "MPRP 2" will aesthetically do to our County? Lastly, regarding the Eastalco data center campus, it's estimated to generate \$215 million in annual county tax revenue once operational (40 percent of the County's annual property tax revenue). What is the Net benefit/cost? Thank you in advance for your consideration Joe Savona Adamstown MD Sent from my iPhone



Outlook

Data Center Overlay

From L R <romdiver@gmail.com>

Date Sun 12/14/2025 11:50 AM

To Council Members <CouncilMembers@FrederickCountyMD.gov>

[EXTERNAL EMAIL]

Dear Council Member:

Words are important. Remember these about the Data Center:

- CRITICAL: The Critical Data Infrastructure is not critical to any Frederick County resident;
- LOOPHOLE: The well-named Quantum Loophole is already polluting Frederick's water and air;
- LESS THAN 1% OF FREDERICK COUNTY: This "limits" data centers to about 7 square miles;
- ELECTIONS: Data centers can't vote in the next County Council Election...but we can.

New Design Road is the "line in the sand". Where do you stand?

L.D. Romane, M.D.

Dec. 15, 2025

Frederick County Council
12 East Church Street
Frederick, MD 21701

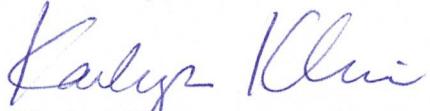
Dear President Young and Members of the Frederick County Council,

As a longtime Frederick County resident and supporter of local nonprofits, including as a founder of the Women's Giving Circle, I strongly support the expanded Critical Digital Infrastructure Overlay. Data centers generate stable tax revenue and foster partnerships that help nonprofits, including women's empowerment initiatives, extend our impact.

Since development began in 2024, these data center companies like Rowan have shown an impressive commitment to supporting community programs, including the Giving Circle and many other community-driven causes. Their sustainable development practices further align with our shared goal of responsible growth that will keep Frederick County feeling like Frederick County – hospitable, beautiful, and full of potential.

Approving this overlay is an opportunity to strengthen nonprofits, create local opportunities, and build a more resilient community. I urge your support.

Sincerely,



Karlys Kline

35 E. All Saints St
304
Frederick, MD 21701
Kline901@comcast.net
240-37-6400



Outlook

Dec 16 Hearing same as CMES Holiday Concert

From Elyse Wilson <elysewilsonkhk@gmail.com>

Date Sat 12/13/2025 10:43 PM

To Santa Hsu <Santahsu@comcast.net>

Cc Knapp, Renee <RKnapp@FrederickCountyMD.gov>; Young, Brad <BYoung@FrederickCountyMD.gov>; County Executive <CountyExecutive@FrederickCountyMD.gov>; Council Members <CouncilMembers@FrederickCountyMD.gov>; Donald, Jerry <JDonald@FrederickCountyMD.gov>; McKay, Steve <SMcKay@FrederickCountyMD.gov>; Keegan-Ayer, MC <MCKeegan-Ayer@FrederickCountyMD.gov>; Duckett, Kavonte <KDuckett@FrederickCountyMD.gov>; Carter, Mason <MCarter@FrederickCountyMD.gov>; Amy And Sten Olsson <olssons@gmail.com>; Angie Cook <Dogmom65412@gmail.com>; Billy Beam <billbeam4th@gmail.com>; Brian Sweeney <briansweeney8911@gmail.com>; Carl Rosey <croseycool@gmail.com>; Dale Franklin <dale.franklin@yahoo.com>; Eric Schaub <Eschaub101@aol.com>; Jack Le <Jackqle@hotmail.com>; Jason Norris <jason_norris301@hotmail.com>; John Laura Noffsinger <Rymer67@msn.com>; Joseph Clark <csanddenterprisesllc@gmail.com>; Judy Rosey <jprosey@hotmail.com>; Kelly Le <kellyod518@aol.com>; Laura Franklin <1momof5@gmail.com>; Mary Beam <beamery@comcast.net>; Peter Michael <phmichael@comcast.net>; Rachel Hornyak <rachel.frymark@gmail.com>; Sarah Gilbert <gillie111@gmail.com>; Stacey Toumey <satuomey@comcast.net>; Steve Black <Steveblack2313@gmail.com>; Tom Vaughn <ctv1027@gmail.com>; Tony Checchia <tonylchecchia@gmail.com>; Vicki Michael <vickimichael@comcast.net>; vicki07@hotmail.com <vicki07@hotmail.com>; whitesands12@gmail.com <whitesands12@gmail.com>; William West <wsrkwest@gmail.com>; Dakota <dakota.g.farr@gmail.com>; Paula damico-Hollewa <pdhollewa@yahoo.com>; Hope Green <hope.green76@yahoo.com>; Gene Butler <rollbackfarmer@comcast.net>; Jennifer@CharltonCommunications.com <Jennifer@charltoncommunications.com>; Jenkins, Chuck (Sheriff) <CJenkins@FrederickCountyMD.gov>; FRANK HOLLEWA <fjhollewa@gmail.com>; Andrew Schotz <aschotz@newspost.com>; Planning Commission <PlanningCommission@FrederickCountyMD.gov>; Michael OConnor <moconnor@cityoffrederickmd.gov>; Folden, William Senator <william.folden@senate.maryland.gov>; Miller, April Delegate <april.miller@house.maryland.gov>; Pippy, Jesse Delegate <jesse.pippy@house.maryland.gov>; Heather Fletcher <heathertravels@yahoo.com>

[EXTERNAL EMAIL]

Dear Frederick County Council and Jessica Fitzwater,

I recently learned from a parent that the Carroll Manor Elementary School (CMES) Holiday Concert is scheduled for December 16th, the exact same evening as the final public hearing regarding the proposed data center.

This scheduling conflict is highly concerning because CMES is the school most significantly affected by the proposed development, which includes 15 Data Centers located behind it ! You all are aware the closest Data Center to this elementary school is only 1974 feet away. Parents and grandparents must now choose between attending a key school event and participating in a critical public hearing that directly impacts their children's learning environment and health.

Whether intentional or not, setting the final public hearing on the same night as the CMES Holiday Concert effectively excludes the most affected residents—CMES parents and teachers—from providing crucial input. The school event had this scheduled over three months ago and it has been on their

schedule!

Therefore, I strongly request that no final decision be made on this matter until the CMES parents and teachers have had the opportunity to attend the last Public hearing they were promised , given that this issue affects them more than any other school in Frederick County, MD. You should have checked the CMES Schedule since they are the ONLY affected School.

The parents I spoke to are angry. Holiday Season and during the CMES Holiday Concert. 😠

Sincerely,

Elyse Wilson

Cc The Broader Adamstown and South Frederick Community plus this will be posted to all social media outlets.

On Sat, Dec 13, 2025 at 6:44 PM Santa Hsu <santahsu@comcast.net> wrote:

Good evening,

I grew up in Buckeystown, in fact my mother still resides there, in the very same house. I attended Carroll Manor Elementary School and for the last 23 years I have resided on East Basford Road. Over the years I watched things change in Frederick County, some good and some not.

I remember when they were building Eastalco. I thought how sad that all that beautiful land was going to become a aluminum industrial plant. Eastalco basically built their plant in the center of the property, planted trees, put up buffers and stayed away from the local residents homes. They provided jobs, paid a decent wage, offered benefits and a retirement package. It provided a good life for mostly local residents and many were able to retire comfortably.

Things changed. The former Eastalco is now Quantum Frederick or Quantum Maryland, the name depends on if you're talking to a developer or a resident. Enormous, tall, ugly concrete data centers are being built, almost right up to residential property lines. You can see these monstrosities from any of the roads that surround the property and more are being constructed .

When the data center is completed and the construction workers are gone, very few people will be employed there and most will not be local. Let's not forget about the massive number of diesel fueled, polluting generators and all the diesel fuel that will be stored on site. There are still over 550 acres that are available to be built on at the original site. An overlay to add more acreage to build more data centers just seems like greed at this point.

There are enough valid and serious concerns with the original approved data center site that no overlay should even be considered at this time.

6 miles down the road from Quantum, heading south west on Ballenger Creek Pike you will see beautiful rolling farmland, cornfields, soybean fields, an abundance of wildlife, breathtaking sunsets and skies so clear at night you cannot count all the stars.

On February 21, 2023, The Suzanne Family Irrevocable Trust purchased the properties at [2404](#) & [2518 Ballenger Creek Pike, Adamstown](#), totaling approximately 257 acres for the sole purpose of building a data center. The realtor, MacRo, clearly advertised that the property was in a Priority Preservation Area and in the Carrollton Manor Rural Legacy Area Program. MacRo even listed a full page of land uses that being in the PPA would allow. Data centers, Microgrids, battery storage, solar arrays and 30 million dollars worth of an EV fleet were not on that list.

A little bit about the property at [2404](#) & [2518 Ballenger Creek Pike, Adamstown](#) and the surrounding area:

The Suzanne property's 257 acres has never been anything but a working crop farm. 69.3% of the soil on the property site is identified as Prime Farmland and Farmland of Statewide Importance.

The Suzanne property is not consistent with the 2012 Comprehensive Plan nor is it in the Eastalco Growth Area or the Adamstown Community Growth Area.

There is no public water or sewer and per Frederick County, none is planned.

On the Suzanne property there are two creeks that run completely across the property. The creeks both flow into the Tuscarora Creek, which is a tributary of the Potomac River. The upper creek on the Suzanne site is fed from the creek on the James Cook property, located on East Basford Road. The Cook's portion of the creek is enrolled in the Maryland Conservation Reserve Enhancement Permanent Easement Program. I doubt the State of Maryland invested their resources to plant native vegetation and put in erosion barriers in order to protect the creek only to have it run onto the Suzanne property and become polluted with industrial debris and chemicals that will end up in the Potomac River. There is also a portion of the Suzanne property that is in a FEMA Floodplain, located from the upper stream to the lower stream.

Near the center of the Suzanne property is a private Johnson family cemetery :

Thomas Johnson II: August 24, 1729 – October 2, 1778

Susan Johnson: 1767 – April, 1801

Thomas Johnson III: April 19, 1768 - (Unknown)

Fayette Johnson: October 15, 1781 – September 24, 1829

Richard Johnson: (Unknown) – August, 1828

Mi(eroded) Johnson: May, 1829 – Broken Headstone

The Suzanne property is located in the Hollowed Ground Scenic Byway area, which is part of the Underground Railroad. In their walk for freedom, the slaves, coming up from Virginia accessed what now is East Basford Road and Ballenger Creek Pike as part of their route northward. There is allegedly a former safe house that confronts the Suzanne property.

The Suzanne property is visible from Route 15, Mar-Lu-Ridge, East Basford Road and Ballenger Creek Pike. Many cyclists and motorcyclists frequent East Basford Road and Ballenger Creek Pike during the warmer months because it is a beautiful, history filled, safe area to ride with very little traffic.

There are only two roads available to access the Suzanne property, East Basford Road and Ballenger Creek Pike. The portion of Ballenger Creek Pike that is adjacent to the Suzanne site is a two lane, windy road with several sharp curves and is unsuitable for large trucks.

East Basford Road is designated as a Rural Road by the Rustic Roads Program. The Rustic Roads program is designed to preserve the county's rural character, history, and scenic beauty. To be considered for participation in the program the road must have low traffic (under 1,000 vehicles/day), low speed limits (under 35 mph) and be outside of growth areas. East Basford Road is a very narrow, unmarked, tar and chipped road and will never be asphalted or striped. The road was not designed for high volume traffic or large heavy truck traffic.

Since 2000, several different rezoning requests have been made and all the requests were denied by the county. A golf course, a large megawatt gas-burning power plant, a housing subdivision, an electrical power plant, a solar plant and a data center, all denied.

In 2023, Sam Fadul, on behalf of the Suzanne Irrevocable Family Trust requested the zoning be changed from A to GI, to construct a data center. The request was denied by the county.

On July 31, 2025, Sam Fadul, of the Suzanne Irrevocable Family Trust, again requested to have the properties at [2404 & 2518 Ballenger Creek Pike, Adamstown](#), rezoned from Agriculture to General Industrial and additionally requests to be included in the CDI overlay. Absolutely NOTHING has changed in the character of the community since Sam Fadul's last rezoning request in 2023. Qloop buried fiber cables in the Potomac Edison Transmission Line easement area, that's it.

Frederick County is known for its farmland and scenic beauty.

The East Basford Road-Ballenger Creek Pike area is rich in history and known for its picturesque farmland. This area is special, from Confederate and Union soldiers camping in the fields as they headed north, to some of the most fertile and productive soil in the State of Maryland.

I respectfully request that the county council deny the Suzanne Irrevocable Family Trust's request to be rezoned from Agricultural to General Industrial and or Limited Industrial.

I also request that the Suzanne Irrevocable Family Trust's request to be included in the CDI overlay be denied as well.

Sincerely,
Santa Hsu
[4731 E Basford Road](#)
[Frederick, MD 21703](#)

council meeting 12/16/25

From: Anne Garnett, agarnett02@gmail.com / 240-285-6517
3264 Geranium Court
Adamstown, MD 21710

Whole Council and The Executive of Frederick County,

Dear all,

To Say I am extremely disappointed in the Government of Frederick County and State Government, is a understatement.

Each and every time I come to a Council meeting or hear from our executive. This data center is going to do nothing but help in the running of things. The jobs (what jobs?) it will produce, the tax revenue it will bring in etc.

So far all it has done is stir up the Super fund site on EastAlco property. And lower wells and cause pollution in wells as well as the beginning of raising our electric Bills.

So again why is the council trying to enlarge Data Center acreage before we see the positive and negatives of what you have already done.

You have started the process with the 2000 acres of Eastalco property and you refuse to just see what happens before you enlarge the space. Why? I don't know? But I do know it is a mistake to do this now.

I also keep hearing it is not in the Councils purview to do the following get involved with the super fund area on the property (belongs to the State) The Water usage that is the State problem. The Electricity again belongs to the State.

you the Council have pushed this and it will be handed off to the next council just like it was when Eastalco came in and left a

mess. But it is This council who will be remembered for not doing the following:

Protecting the folks that live in Adamstown

Making sure the state is doing all it should to protect the Ground water, and Air in Adamstown.

Preventing the pollution of wells in Adamstown

Directing the Business building the DAta instead of letting CEnter them lead you.

And many other things that I may not know about yet.

Data CEnters are now being linked to rare cancers (as on NBC news). So This push to move on the overlay and give even more land over to building DAta Centers is a mistake in my opinion. If things prove out in a positive way you can always to it in the future.

I am not against data centers I am against the way you are doing it at this time. Data CEnters should be controlled and the Council and planning and State government, should be doing a better job of that.

DENY the Adamstown Overlay Expansion

From Edna Howard <ednahoward@yahoo.com>

Date Sun 12/14/2025 10:39 AM

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

[EXTERNAL EMAIL]

Good morning Council Members,

I am writing to ask you to DENY the overlay expansion to beyond the East Alcoa site. Let's please wait and see what the impact the already built data centers will have on the area before expanding.

This is truly an issue that will impact the Adamstown community for a number of years to come. From hundreds of gas diesel generators, to noise and dirt issues, to electric and contaminated well waters, to environmental issues, to Carroll Manor Elementary youth, to electric bills increasing and property values decreasing.

We don't need hyperscale AI data centers, but we do need clean water and air. Elected

officials aren't listening to their constituents and are still repeating the lies and empty promises in spite of the ample evidence of crimes against working class by these monstrosities. Rushing construction is dangerous since data centers can use as much water and electricity as an entire city. More than 200 environmental groups have demanded a halt to new datacenters across the US so it makes sense to wait on the overlay expansion to see what's going to happen with what's already there.

This is such a beautiful area and you are destroying it if you approve more land for them to build these data centers on. If it such a great idea, then spread them out and put them all over Frederick County.

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



Halt the Expansion of the Data Center Zone

From Seth Funk <seth.n.funk@gmail.com>

Date Sun 12/14/2025 2:28 PM

To Council Members <CouncilMembers@FrederickCountyMD.gov>

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

[EXTERNAL EMAIL]

To the Councilmembers and Council Executive of Frederick County,

My name is Seth Funk and I am emailing to demand you reject the expansion of the data center zone in Frederick County. This proposal is not only dangerous and destructive to the environment, it would cripple affordability for the citizens of Frederick County and the neighboring counties. This idea is short sighted and pushed by massive corporations who don't care about what happens to the people here; they only see massive dollar signs in their profits, and hope that by waving a tiny fraction of these profits in front of you, you'll forget that you are here to work for the people of Frederick, not Big Tech.

Affordability has, thus far, been a prominent message across the county for its people. Many of you campaigned on precisely this issue. Data centers will drive up energy costs even further at a time when people can barely afford it already. I paid nearly \$200 in electricity before the coldest parts of the season even began, and that was with significant steps to lower my energy usage before the winter months. How do you plan to build an affordable place to live and keep up with the growth of the county after their bills skyrocket and their home values plummet?

You propose to add areas that are from Priority Preservation areas and Rural Legacy Areas, but then claim that the money from the Data Centers will be used to assist with environmental projects. How is this plan even coherent? You need to destroy the environment and the work of over 15 years of protection in order to fund restarting the entire process? Should this expansion go through, this single industry will destroy all of the progress that Frederick has made in its stewardship, and all of it will have been for nothing. The complex has been given numerous "Stop Work" orders and there are two ongoing investigations with the MD Attorney General. Do you truly believe that they will respect any environmental rules you lay before them?

There are no plans to generate additional power for this complex, which will use two entire Baltimore's worth of energy, and no study has been done to understand the potential impacts it will have on the county. So, with no understanding of the future, no understanding of how this will affect your residents, and no plans to generate additional power, how is expanding the size of the data center zone wise?

My family and I have lived, worked, and died in-and-around Frederick County for generations. I know the location of my great-great-great grandfather's home before he served in the 4th Maryland in the Civil War. I have ancestors that were here for the War of Independence. We have deep connections to

this area. The skyrocketing cost of living prices, including food, housing, and energy, have already driven out so many from the area and even the state. This data center would make all of them exponentially worse, even if not expanded.

Please do not expand this zone. Do not expand it because of the promise of a small fraction from the companies now. Remember that you work for the people of Frederick County. Do not sell the future of Frederick County and the ability for working people, like me and my family, to live and raise a family in this great community.

I hope that you make the right decision for the people of Frederick, and reject this expansion.



NO to Suzanne Irrevocable Trust Rezoning and Overlay Requests

From Santa Hsu <santahsu@comcast.net>
Date Sat 12/13/2025 6:44 PM
To Knapp, Renee <RKnapp@FrederickCountyMD.gov>; Young, Brad <BYoung@FrederickCountyMD.gov>; County Executive <CountyExecutive@FrederickCountyMD.gov>; Council Members <CouncilMembers@FrederickCountyMD.gov>; Donald, Jerry <JDonald@FrederickCountyMD.gov>; McKay, Steve <SMCKay@FrederickCountyMD.gov>; Keegan-Ayer, MC <MCKeegan-Ayer@FrederickCountyMD.gov>; Duckett, Kavonte <KDuckett@FrederickCountyMD.gov>; Carter, Mason <MCarter@FrederickCountyMD.gov>; Amy And Sten Olsson <olssons@gmail.com>; Angie Cook <Dogmom65412@gmail.com>; Billy Beam <billbeam4th@gmail.com>; Brian Sweeney <briansweeney8911@gmail.com>; Carl Rosey <croseycool@gmail.com>; Dale Franklin <dale.franklin@yahoo.com>; Eric Schaub <Eschaub101@aol.com>; Elyse Wilson <elysewilsonkhk@gmail.com>; Jack Le <Jackqle@hotmail.com>; Jason Norris <jason_norris301@hotmail.com>; John Laura Noffsinger <Rymer67@msn.com>; Joseph Clark <csanddenterprisesllc@gmail.com>; Judy Rosey <jprosey@hotmail.com>; Kelly Le <kellyod518@aol.com>; Laura Franklin <1momof5@gmail.com>; Mary Beam <beamery@comcast.net>; Peter Michael <phmichael@comcast.net>; Rachel Hornyak <rachel.frymark@gmail.com>; Sarah Gilbert <gillie111@gmail.com>; Stacey Toumey <satuomey@comcast.net>; Steve Black <steveblack2313@gmail.com>; Tom Vaughn <ctv1027@gmail.com>; Tony Checchia <tonylchecchia@gmail.com>; Vicki Michael <vickimichael@comcast.net>; vicki07@hotmail.com <vicki07@hotmail.com>; whitesands12@gmail.com <whitesands12@gmail.com>; William West <wsrkwest@gmail.com>; Dakota <dakota.g.farr@gmail.com>

[EXTERNAL EMAIL]

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I respectfully request that the county council deny the Suzanne Irrevocable Family Trust's request to be rezoned from Agricultural to General Industrial and or Limited Industrial.

I also request that the Suzanne Irrevocable Family Trust's request to be included in the CDI overlay be denied as well.

Sincerely,
Santa Hsu
4731 E Basford Road
Frederick, MD 21703

Opposition to Overlay Zone at Quantum Frederick Site

From Steve Bruns <stevebruns@aol.com>
Date Sun 12/14/2025 1:37 PM
To Council Members <CouncilMembers@FrederickCountyMD.gov>

[EXTERNAL EMAIL]

Dear Frederick County Council Members,

Proponents of data centers talk of new jobs and tax revenues. But the jobs they speak of are few—temporary construction jobs and a handful of technicians to run the centers. In fact, the whole point of Artificial Intelligence is to eliminate jobs—by the tens of millions. It will decimate the State’s tax base.

Dario Amodei, CEO of Anthropic, predicts that AI could wipe out half of all entry-level white-collar jobs in the next one to five years and that unemployment in the US could hit 10% - 20%. Vermont Senator Bernie Sanders* says the job losses could hit 40% of registered nurses, 47% of truck drivers, 64% of accountants, 65% of teaching assistants, and 89% of fast food workers, among many other occupations.

There are many other issues that need to be addressed—water and electric power to name just two. As Senator Sanders notes, we need federal regulation. We in Maryland, however, can’t wait for federal action. Until the issues are resolved, the responsible approach for our government would be to halt further construction of data centers in Frederick County.

* <https://www.sanders.senate.gov/op-eds/ai-poses-unprecedented-threats-congress-must-act-now/>



Please No Data center expansion

From Jenn Murray <jmurray1017@gmail.com>

Date Sat 12/13/2025 6:54 PM

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

[EXTERNAL EMAIL] Hello, I am asking you to vote no to the data center expansion plan. I am a resident of Adamstown Maryland and this expansion will drastically change everything I love about my community for the worst. When I moved to Adamstown 21 years ago until recently it had been a very quiet community. In the past few months it has gotten noisy and there has been significantly more traffic due to the data centers already being built. I ask the county council to vote no to the expansion plan so we can see if these data centers offer any benefits to the community or have an extreme negative effects. There is currently two data center sites and we have no way to know how these are going to effect the community. I ask vote no to the expansion plan and give it a few years to determine the effect. If these data centers do not have an impact after a few years then decide on re-zoning then. Please do not make a decision that could have catastrophic consequences that cannot be reversed. Thanks, Jennifer Murray

Re: Data Center

From BRENDA SCHROEDER <brendaleeschroeder@msn.com>

Date Sat 12/13/2025 11:37 AM

To Constituent Services <constituentservices@FrederickCountyMD.gov>; Council Members <CouncilMembers@FrederickCountyMD.gov>

[EXTERNAL EMAIL]

Dear County Executive Fitzwater and County Council Members:

In my previous message, I outlined my objections to the data center project. I included an Instagram link that had more information backing up my objection. I am today, including a second Instagram link. It clearly states all of my objections to the data center proposal. It is stating the truth through humor. But it is still the truth.



Charlie Berens on Instagram:
"Coming to a town near you . . .
#invention #robots #comedy
#howto"
instagram.com

Please do not succumb to the lies. No good can come to us, our county, or our planet from this data center. Please stop this project. Thank you.

Sincerely,
Brenda Schroeder

On Dec 7, 2025, at 2:31 PM, BRENDA SCHROEDER <brendaleeschroeder@msn.com> wrote:

Dear County Executive Fitzwater:

I am emailing with my many concerns about the data center being proposed for the Eastalco campus. I am greatly concerned about the hazards to our environment, the added air and water pollution from the massive amounts of energy required, the increased energy costs to our county residents due to the new infrastructure needed and the massive draw on our energy providers, and above all, privacy concerns over the data being held. The latter is especially worrisome, given the current administration in Washington DC. I am hoping that your committee is looking into all of these matters and putting safeguards into place to protect us. I am also sending along a link to an Instagram post about how Finland is dealing with some of these same issues. https://www.instagram.com/p/DR5E8FFExlu/?img_index=7&igsh=MWxoZG5vZmk1Z2E2Mg==

Sincerely,
Brenda Schroeder



Re: Dec 16 Hearing same as CMES Holiday Concert

From PHM <phmichael@comcast.net>

Date Sun 12/14/2025 10:35 AM

To Elyse Wilson <elysewilsonkhk@gmail.com>

Cc Santa Hsu <Santahsu@comcast.net>; Knapp, Renee <RKnapp@FrederickCountyMD.gov>; Young, Brad <BYoung@FrederickCountyMD.gov>; County Executive <CountyExecutive@FrederickCountyMD.gov>; Council Members <CouncilMembers@FrederickCountyMD.gov>; Donald, Jerry <JDonald@FrederickCountyMD.gov>; McKay, Steve <SMckay@FrederickCountyMD.gov>; Keegan-Ayer, MC <MCKeegan-Ayer@FrederickCountyMD.gov>; Duckett, Kavonte <KDuckett@FrederickCountyMD.gov>; Carter, Mason <MCarter@FrederickCountyMD.gov>; Amy And Sten Olsson <olssons@gmail.com>; Angie Cook <Dogmom65412@gmail.com>; Billy Beam <billbeam4th@gmail.com>; Brian Sweeney <briansweeney8911@gmail.com>; Carl Rosey <croseycool@gmail.com>; Dale Franklin <dale.franklin@yahoo.com>; Eric Schaub <Eschaub101@aol.com>; Jack Le <Jackqle@hotmail.com>; Jason Norris <jason_norris301@hotmail.com>; John Laura Noffsinger <Rymer67@msn.com>; Joseph Clark <csanddenterprisesllc@gmail.com>; Judy Rosey <jprosey@hotmail.com>; Kelly Le <kellyod518@aol.com>; Laura Franklin <1momof5@gmail.com>; Mary Beam <beamery@comcast.net>; Rachel Hornyak <rachel.frymark@gmail.com>; Sarah Gilbert <gillie111@gmail.com>; Stacey Toumey <satuomey@comcast.net>; Steve Black <Steveblack2313@gmail.com>; Tom Vaughn <ctv1027@gmail.com>; Tony Checchia <tonylchecchia@gmail.com>; Vicki Michael <vickimichael@comcast.net>; Zoning Group 2 <vicki07@hotmail.com>; Zoning Group 1 <whitesands12@gmail.com>; William West <wsrkwest@gmail.com>; Dakota <dakota.g.farr@gmail.com>; Paula damico-Hollewa <pdhollewa@yahoo.com>; Hope Green <hope.green76@yahoo.com>; Gene Butler <rollbackfarmer@comcast.net>; Jennifer@CharltonCommunications.com <Jennifer@charltoncommunications.com>; Jenkins, Chuck (Sheriff) <CJenkins@FrederickCountyMD.gov>; FRANK HOLLEWA <fjhollewa@gmail.com>; Andrew Schotz <aschotz@newspost.com>; Planning Commission <PlanningCommission@FrederickCountyMD.gov>; Michael OConnor <moconnor@cityoffrederickmd.gov>; Folden, William Senator <william.folden@senate.maryland.gov>; Miller, April Delegate <april.miller@house.maryland.gov>; Pippy, Jesse Delegate <jesse.pippy@house.maryland.gov>; Heather Fletcher <heathertravels@yahoo.com>

[EXTERNAL EMAIL]

Board of County Commissioners Members:

I would like to second the request of Adamstown resident Elyse Wilson that the Board of County Commissioners provide the teachers and families of the Carroll Manor Elementary School the opportunity to attend a rescheduled public hearing on the proposed data center overlay.

Respectfully submitted,

Peter H. Michael

2455 Ballenger Creek Pike
Adamstown, Maryland 21710

E> phmichael@comcast.net

T> 301.874.0235

W> peterhmichael.com



Re: NO to Suzanne Irrevocable Trust Rezoning and Overlay Requests

From Angela Cook <dogmom65412@gmail.com>

Date Sat 12/13/2025 8:40 PM

To Santa Hsu <santahsu@comcast.net>

Cc Knapp, Renee <RKnapp@FrederickCountyMD.gov>; Young, Brad <BYoung@FrederickCountyMD.gov>; County Executive <CountyExecutive@FrederickCountyMD.gov>; Council Members <CouncilMembers@FrederickCountyMD.gov>; Donald, Jerry <JDonald@FrederickCountyMD.gov>; McKay, Steve <SMcKay@FrederickCountyMD.gov>; Keegan-Ayer, MC <MCKeegan-Ayer@FrederickCountyMD.gov>; Duckett, Kavonte <KDuckett@FrederickCountyMD.gov>; Carter, Mason <MCarter@FrederickCountyMD.gov>; Amy And Sten Olsson <olssons@gmail.com>; Billy Beam <billbeam4th@gmail.com>; Brian Sweeney <briansweeney8911@gmail.com>; Carl Rosey <croseycool@gmail.com>; Dale Franklin <dale.franklin@yahoo.com>; Eric Schaub <Eschaub101@aol.com>; Elyse Wilson <elysewilsonkhk@gmail.com>; Jack Le <Jackqle@hotmail.com>; Jason Norris <jason_norris301@hotmail.com>; John Laura Noffsinger <Rymer67@msn.com>; Joseph Clark <csanddenterprisesllc@gmail.com>; Judy Rosey <jprosey@hotmail.com>; Kelly Le <kellyod518@aol.com>; Laura Franklin <1momof5@gmail.com>; Mary Beam <beamery@comcast.net>; Peter Michael <phmichael@comcast.net>; Rachel Hornyak <rachel.frymark@gmail.com>; Sarah Gilbert <gillie111@gmail.com>; Stacey Toumey <satuomey@comcast.net>; Steve Black <steveblack2313@gmail.com>; Tom Vaughn <ctv1027@gmail.com>; Tony Checchia <tonylchecchia@gmail.com>; Vicki Michael <vickimichael@comcast.net>; vicki07@hotmail.com <vicki07@hotmail.com>; whitesands12@gmail.com <whitesands12@gmail.com>; William West <wsrkwest@gmail.com>; Dakota <dakota.g.farr@gmail.com>

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This is beautiful. So terrifying that our property could be turned to a wasteland in the blink of an eye.
See you at the meeting.

Angela Cook

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Sincerely,
Santa Hsu

4731 E Basford Road
Frederick, MD 21703



Outlook

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To Angela Cook <dogmom65412@gmail.com>

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[EXTERNAL EMAIL]

Bravo!

Vicki Michael

Sent from my iPad

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The Suzanne property is not consistent with the 2012 Comprehensive Plan nor is it in the Eastalco Growth Area or the Adamstown Community Growth Area.

There is no public water or sewer and per Frederick County, none is planned.

On the Suzanne property there are two creeks that run completely across the property. The creeks both flow into the Tuscarora Creek, which is a tributary of the Potomac River.

The upper creek on the Suzanne site is fed from the creek on the James Cook property, located on East Basford Road. The Cook's portion of the creek is enrolled in the Maryland Conservation Reserve Enhancement Permanent Easement Program. I doubt the State of Maryland invested their resources to plant native vegetation and put in erosion barriers in order to protect the creek only to have it run onto the Suzanne property and become polluted with industrial debris and chemicals that will end up in the Potomac River. There is also a portion of the Suzanne property that is in a FEMA Floodplain, located from the upper stream to the lower stream.

Near the center of the Suzanne property is a private Johnson family cemetery :

Thomas Johnson II: August 24, 1729 – October 2, 1778

Susan Johnson: 1767 – April, 1801

Thomas Johnson III: April 19, 1768 - (Unknown)

Fayette Johnson: October 15, 1781 – September 24, 1829

Richard Johnson: (Unknown) – August, 1828

Mi(eroded) Johnson: May, 1829 – Broken Headstone

The Suzanne property is located in the Hollowed Ground Scenic Byway area, which is part of the Underground Railroad. In their walk for freedom, the slaves, coming up from Virginia accessed what now is East Basford Road and Ballenger Creek Pike as part of their route northward. There is allegedly a former safe house that confronts the Suzanne property.

The Suzanne property is visible from Route 15, Mar-Lu-Ridge, East Basford Road and Ballenger Creek Pike. Many cyclists and motorcyclists frequent East Basford Road and Ballenger Creek Pike during the warmer months because it is a beautiful, history filled, safe area to ride with very little traffic.

There are only two roads available to access the Suzanne property, East Basford Road and Ballenger Creek Pike. The portion of Ballenger Creek Pike that is adjacent to the Suzanne site is a two lane, windy road with several sharp curves and is unsuitable for large trucks.

East Basford Road is designated as a Rural Road by the Rustic Roads Program. The Rustic Roads program is designed to preserve the county's rural character, history, and scenic beauty. To be considered for participation in the program the road must have low traffic (under 1,000 vehicles/day), low speed limits (under 35 mph) and be outside of growth areas. East Basford Road is a very narrow, unmarked, tar and chipped road and will never be asphalted or striped. The road was not designed for high volume traffic or large heavy truck traffic.

Since 2000, several different rezoning requests have been made and all the requests were denied by the county. A golf course, a large megawatt gas-burning power plant, a housing subdivision, an electrical power plant, a solar plant and a data center, all denied.

In 2023, Sam Fadul, on behalf of the Suzanne Irrevocable Family Trust requested the zoning be changed from A to GI, to construct a data center. The request was denied by the county.

On July 31, 2025, Sam Fadul, of the Suzanne Irrevocable Family Trust, again requested to have the properties at [2404 & 2518 Ballenger Creek Pike, Adamstown](#), rezoned from Agriculture to General Industrial and additionally requests to be included in the CDI overlay.

Absolutely NOTHING has changed in the character of the community since Sam Fadul's last rezoning request in 2023. Qloop buried fiber cables in the Potomac Edison Transmission Line easement area, that's it.

Frederick County is known for its farmland and scenic beauty.

The East Basford Road-Ballenger Creek Pike area is rich in history and known for its picturesque farmland. This area is special, from Confederate and Union soldiers camping in the fields as they headed north, to some of the most fertile and productive soil in the State of Maryland.

I respectfully request that the county council deny the Suzanne Irrevocable Family Trust's request to be rezoned from Agricultural to General Industrial and or Limited Industrial.

I also request that the Suzanne Irrevocable Family Trust's request to be included in the CDI overlay be denied as well.

Sincerely,

Santa Hsu

[4731 E Basford Road](#)
[Frederick, MD 21703](#)



Slow down: Vote NO on overlay zone expansion beyond FCPC recommendation

From Jean Cavanaugh <jeancavanaugh@fastmail.fm>
Date Sat 12/13/2025 6:21 PM
To Council Members <CouncilMembers@FrederickCountyMD.gov>

[EXTERNAL EMAIL]

Dear Councilmembers,

What's the hurry to expand the FCPC recommended overlay zone? Data centers will have such a huge and unknown impact on Adamstown and the entirety of Frederick County, it is vital we wait until there's been formal independent studies. I am hoping the State legislature overturns the Governor's veto of a data center study. If they did, that's another reason to delay expanding the overlay zone.

I understand the need for revenue. The numbers thrown out by the executive branch would make anyone salivate - \$50M a year? However, we don't know if that is gross or net income, what the costs to the county would be to maintain, repair, repay, buy more agricultural land, etc. The county has not done a formal independent economic impact study. We need that done before decisions are made on expanding the overlay zone.

Another thing we don't know is what the final tax rates will be (real estate and personal property), if data centers doing federal government business will be exempt, if the state or even the county will give additional tax benefits now or later. All those pieces would be part of an economic impact study.

Data centers' massive water and energy use continue to trouble me. I have heard a rumor about gray water being pumped from nearby, but at the same time the data centers need over a million gallons a day in potable water? Why aren't they required to use new technologies, like Council member Donald suggested?

In drought situations - that would be every summer - are the 400 generators going to be running 24/7? Will they be diesel, natural gas or propane, with propane being the quietest option? How can the county regulate all of that?

The county needs to require that the data center produce as much of its own power as possible. I understand solar panels alone won't meet much of their ravenous need, but it's a start.

I'd also like to see the county have a succession plan for when these data centers are obsolete. A study done for the state could look at such eventualities.

Thank you for voting NO on the overlay zone expansion beyond the FCPC recommendations.

Jean Cavanaugh
7108 Ridge Crest Dr
Frederick, MD 21702



Source: The Frederick News-Post True Cost Data Centers

From Elyse Wilson <elysewilsonkhk@gmail.com>

Date Sat 12/13/2025 8:13 PM

To Council Members <CouncilMembers@FrederickCountyMD.gov>; Young, Brad <BYoung@FrederickCountyMD.gov>; Knapp, Renee <RKnapp@FrederickCountyMD.gov>; Keegan-Ayer, MC <MCKeegan-Ayer@FrederickCountyMD.gov>; STEVE MCKAY <stevemckay@comcast.net>; Donald, Jerry <JDonald@FrederickCountyMD.gov>; Carter, Mason <MCarter@FrederickCountyMD.gov>; governor.mail@maryland.gov <governor.mail@maryland.gov>; Planning Commission <PlanningCommission@FrederickCountyMD.gov>; nanasentuo.bonsu@fox.com <nanasentuo.bonsu@fox.com>; County Executive <CountyExecutive@FrederickCountyMD.gov>; Pickett, Amy E <amy.pickett@fcps.org>; Folden, William Senator <william.folden@senate.maryland.gov>; Pippy, Jesse Delegate <jesse.pippy@house.maryland.gov>; Duckett, Kavonte <KDuckett@FrederickCountyMD.gov>; Jenkins, Chuck (Sheriff) <CJenkins@FrederickCountyMD.gov>; Jennifer@CharltonCommunications.com <Jennifer@charltoncommunications.com>

[EXTERNAL EMAIL]

Source: The Frederick News-Post Trading farms for fumes: the true cost of data centers

<https://share.google/ITrQuDz9VJ9WQclbW>



Outlook

Stop Data Center Expansion

From Elizabeth Willis <mcbeth@mac.com>

Date Sat 12/13/2025 10:39 PM

To Council Members <CouncilMembers@FrederickCountyMD.gov>; County Executive Jessica Fitzwater <info@jessicafitzwater.com>; Planning Commission <PlanningCommission@FrederickCountyMD.gov>

Cc John Willis <macjohn@mac.com>

[EXTERNAL EMAIL]

Dear Elected Officials,

We write yet again urging you to accept the recommendations of the Planning Commission re: the proposed data center overlay.

We were dismayed to read comments in the press from some of you re: your inclination to support a hybrid approach to data center expansion, rather than accept the recommendations of the Planning Commission. We recognize that this is a complex issue, complex with different stakeholders, competing priorities and technical land use and planning issues. We can only cite any number of other jurisdictions that have cut through the noise and made wise decisions to limit data centers to preserve land, address environmental issues and mitigate negative economic impact concerns.

We were dismayed to read about the proposed use of diesel generators for the Adamstown data centers currently under construction, as it makes clear the environmental impact of even the data centers we have already approved. The normal electric grid power used by the data centers will cause so much additional greenhouse gas emissions that *Frederick County's climate policies will all be obliterated. Everything the county and the citizens have done in the last 15+ years will be undone.* Every new climate regulation and all the spending to cut emissions will be replaced by this one new industry.

We were dismayed to receive in the mail yet again, glossy, expensive advertising from the Data Center Alliance of Maryland, that “greenwashes” the impacts of the data centers, and provides misleading information about the issues and concerns that so many of your constituents have raised about the proposed data center overlay zone. It is clear who has the money to influence, and it is not your concerned constituents.

We remain dismayed that the almost daily articles in the national press addressing data center impacts, and questioning the economic promises being made- that this veritable tsunami of information does not seem to figure into the thinking of many of you as you contemplate the upcoming consequential vote.

We remain dismayed, and incredulous that the many questions raised by so many of your constituents have not been addressed. These include:

- Why hasn't there been an independent and thorough economic analysis of the impacts and costs of an expanded overlay zone?
- Why is this expansion being proposed at this time when the Data Centers Workgroup and current County regulations say there should be no data centers in Priority Preservation or Rural Legacy areas?
- Why are we proposing to expand the CDI Overlay by another 1000 acres of prime farm land, when both the county and the state appear unable to effectively monitor and regulate the significant environmental violations from the current construction?
- Where is the power to operate these data centers going to come from? More power lines like MPRP will be needed to bring in the energy for this huge data center zone. Adding another 1000 acres of data center will need even more electricity. If the power demands, and impacts on Frederick County, are still unknown for the current data center area, then how is it a good idea to double the size of the data center zone?

Continuing to wish you wisdom and courage as you work to address this vital issue.

Beth Willis mcbeth@mac.com
Dr. John Willis macjohn@mac.com
8135 Ball Rd
Frederick, MD 21704
301-514-7648



Stop Data Center Sprawl in Frederick County

From Julien Libert <j.r.libert.a@gmail.com>

Date Sun 12/14/2025 11:39 AM

[EXTERNAL EMAIL] Hello, I am writing to ask that we put the strictest limitation on data center development in our county. Given the costs - electric bills, home values, quality of life, mooting of so many environmental efforts county officials and residents have undertaken in recent years - we should table any expansion. The council can wait until we're on the other side of this so called AI bubble, and these very innovative companies behind this industry have come to the table with crucial new ways for them to sustainably power and cool their industries. Thank you, Julien Frederick, MD



STOP THE DATA CENTER INSANITY

From Krista Ochlech <kochlech@comcast.net>

Date Sun 12/14/2025 11:16 AM

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

[EXTERNAL EMAIL]

All,

Have you seen what is happening in our community? I sincerely hope you care enough to see it for yourself.

The rapid expansion of data centers will have serious consequences for residents: increased electric bills, strain on our water supply, air pollution, noise and light pollution, and a significant loss in nearby property values. While some impacts may not be felt equally by everyone, many of us will bear the brunt of these changes. Frequent power issues, including blackouts and brownouts, are not hypothetical concerns—they affect daily life and damage appliances.

This is not the “Livable Frederick” we were promised. It feels more like Northern Virginia’s sprawl creeping into a community that many of us deliberately chose for its semi-rural character. We moved here believing Frederick County valued balance, planning, and quality of life. That belief is now being tested.

I strongly urge you to visit the affected area before voting on the data center expansion. If the expansion moves forward, the anticipated tax revenue will likely be consumed by the need for major infrastructure upgrades. Our roads are already at capacity, and surrounding neighborhoods will see declining property values through no fault of their own.

Please consider the long-term impacts on residents and the character of our community. Thoughtful growth matters and so does protecting the people who already live here.

Do the right thing. Enough is enough.

Krista Ochlech
5809 Underwood Ct
Adamstown, MD 21710

STOP the DataCenter expansion in Frederick County

From Martha Morris <morrism@gwu.edu>

Date Sun 12/14/2025 1:02 PM

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

[EXTERNAL EMAIL]

Dear Council members please review the following issues that are critical to me and my family as residents of Frederick County.

1) **No objective economic analysis has been done** or has even been proposed yet to support the huge changes to the character of the region. The Plan says that the County makes significant investments in its Growth Areas.

QUESTIONS:

- a) How much will an increased Eastalco Growth Area cost?
- b) What is the NET revenue from this huge increase in industrial activity?
- c) How will skyrocketing electric bills and crashing home values affect the financial impact of adding more data centers?

2) **Expansion of the data center zone could require the elimination of more than 1000 acres of farmland.**

All of this prime agricultural soil is in either the County Priority Preservation Area or the State Rural Legacy area, or **BOTH**. The Data Centers Workgroup and current County regulations say no data centers in Priority Preservation or Rural Legacy areas.

QUESTION: Why is this even being proposed?

3) **Both the county and the state appear unable to effectively monitor and regulate environmental violations from the current construction.**

Since start of construction the sites have racked up well over 100 major environmental violations. The complex has been given “Stop Work” orders and there are **still** two ongoing Maryland Attorney General’s Office investigations.

QUESTION: Given these limitations, why is it prudent to expand the CDI Overlay by another 1000 acres?

4) **The current, already approved, Eastalco Data Center Complex will use the same amount of electricity as TWO Baltimores.**

QUESTIONS:

- a) Where is this power going to come from? More power lines like MPRP will be needed to bring in the energy for this huge data center zone. Adding another 1000 acres of data center will need even more electricity.

b) If the power demands, and impacts on Frederick County, are still unknown for the current data center area, then how is it a good idea to double the size of the data center zone?

5) The power demands of two or three Baltimores also brings pollution to our region. The current Eastalco data center area will need over 1000 diesel generators, each the same size as a freight train locomotive.

Expanding the data center area will require even more generators. The normal electric grid power used by the data centers will cause so much additional greenhouse gas emissions that *Frederick County's climate policies will all be obliterated. Everything the county and the citizens have done in the last 15+ years will be undone.* Every new climate regulation and all the spending to cut emissions will be replaced by this one new industry.

We wish the county to act responsibly in decisions about this industrial growth that will impact residents economically and reduce the treasured landscape and important agricultural production. We very much object to expanding the data center development in the county!

Sincerely,

--
Martha Morris Shannon
Point of Rocks, Md

Urgent: Rowan is Cashing Out! The \$10 B Lie!!

From Elyse Wilson <elysewilsonkhk@gmail.com>

Date Sun 12/14/2025 12:28 PM

To Council Members <CouncilMembers@FrederickCountyMD.gov>; County Executive <CountyExecutive@FrederickCountyMD.gov>; McKay, Steve <SMcKay@FrederickCountyMD.gov>; Donald, Jerry <JDonald@FrederickCountyMD.gov>; Duckett, Kavonte <KDuckett@FrederickCountyMD.gov>; Carter, Mason <MCarter@FrederickCountyMD.gov>; Keegan-Ayer, MC <MCKeegan-Ayer@FrederickCountyMD.gov>; Knapp, Renee <RKnapp@FrederickCountyMD.gov>; Young, Brad <BYoung@FrederickCountyMD.gov>; Planning Commission <PlanningCommission@FrederickCountyMD.gov>; Venable, Victoria <VVenable@FrederickCountyMD.gov>

Cc Paula damico-Hollewa <pdhollewa@yahoo.com>; Linda Everett <linda@edgedesigngroupllc.com>; Heather Fletcher <heathertravels@yahoo.com>; Jennifer@CharltonCommunications.com <Jennifer@charltoncommunications.com>; Jenkins, Chuck (Sheriff) <CJenkins@FrederickCountyMD.gov>; Hope Green <hope.green76@yahoo.com>; Gene Butler <rollbackfarmer@comcast.net>; FRANK HOLLEWA <fjhollewa@gmail.com>; PHM <phmichael@comcast.net>; santahsu@comcast.net <Santahsu@comcast.net>; Josh Mitchell, P.E. <Jmitchell@millerbrothersinc.com>; Jordan C. Ritter <jordan.ritter@pmpbiz.com>; Luna, Nancy <NLuna@FrederickCountyMD.gov>; nanasentuo.bonsu@fox.com <nanasentuo.bonsu@fox.com>; Andrew Schotz <aschotz@newspost.com>; Marwa Barakat <mbarakat@newspost.com>; mgregory@wusa9.com <mgregory@wusa9.com>; Spencer, Darcy (NBCUniversal) <darcy.spencer@nbcuni.com>; Nancy Keen <Nancy@vanguardmgt.com>

[EXTERNAL EMAIL]

Dear Frederick County Council and County Executive Jessica Fitzwater,

I am writing to formally express my extreme concern and outrage regarding the recent news reports that Rowan Digital Infrastructure is exploring a sale of the company, potentially valuing the deal at \$10 billion.

For months, the residents of Adamstown were assured that Rowan Digital Infrastructure was a long-term "community partner" committed to responsible stewardship and delivering specific community benefits. The news that the parent company, Quinbrook Infrastructure Partners, is actively seeking to sell this asset confirms that this project was always a financial strategy designed to be "flipped" for maximum profit.

The Sale of Our Community for Profit

According to reports published on December 12, 2025, Rowan is exploring either a capital raise or a full sale of the company. The reported \$10 billion valuation is fundamentally driven by the "shovel-ready" status of its land and the controversial power and permit agreements secured here in Frederick County, Maryland.

1. Exploiting Local Approvals: Rowan secured the necessary land and obtained or is currently processing highly contested permits, including the Critical Digital Infrastructure (CDI) zoning and air quality permits related to hundreds of diesel generators for the "Bauxite" projects. They are now attempting to sell these approvals to the highest bidder.

2. Transferring Unvetted Risk: If this sale goes through, the projects and all associated environmental and community obligations will be transferred to a new, entirely unknown corporation that has made zero commitments to Frederick County. The promises Rowan made regarding noise mitigation, environmental protection, and community benefits will become worthless.
3. Breach of Trust: The residents of Adamstown did not consent to have our home packaged and sold by a private equity firm in a Wall Street transaction. We agreed to negotiate with Rowan, not a faceless entity we have never vetted.

Demand for Action

I demand that the County Council and County Executive immediately halt all pending permits and site plan approvals for Rowan Digital Infrastructure.

We cannot allow a "bait and switch" scenario where approvals are granted to one entity, only for them to immediately sell the rights to a new operator. If the applicant changes due to a sale, the application process must be reviewed from scratch. I urge you to stop allowing developers to play financial games with our air quality and the well-being of our community.

Furthermore, I must highlight that the claims of long-term economic benefits are misleading. Data centers offer minimal permanent employment, often only 20 to 25 jobs after construction per Data Centers. This is a poor trade-off for the permanent environmental impact on Frederick County, including the use of over 1,000 diesel generators for the initial 1,600 acres alone. The County should prioritize permanent, sustainable employment opportunities, such as those provided by pharmaceutical companies, over temporary data center jobs.

The County has many other choices that will provide long-term employment and environmental responsibility, thereby supporting the economy instead of damaging it in the long run.

Sincerely,

Elyse Wilson
Adamstown, MD
CC and CC the broader community of Adamstown in South Frederick, Maryland, and posting on all social media platforms

See proof of the sale below

Data Center Firm Rowan Explores Capital Raising Or Sale- The Information

Dec 12, 2025 at 18:28 GMT-5 ·

Refinitiv · Less than 1 min read

ooo

- **DATA CENTER FIRM ROWAN
EXPLORES CAPITAL RAISING OR
SALE- THE INFORMATION**
- **A DEAL COULD VALUE ROWAN
DIGITAL INFRASTRUCTURE AT \$10
BILLION- THE INFORMATION**

From: Mary Perry <perry.mary.106@gmail.com>
Sent: Monday, December 15, 2025 1:58 PM
To: Council Members <CouncilMembers@FrederickCountyMD.gov>
Cc: County Executive <CountyExecutive@FrederickCountyMD.gov>; Planning Commission <PlanningCommission@FrederickCountyMD.gov>
Subject: Enough is enough

[EXTERNAL EMAIL]

Dear Frederick County Council Members,

Please preserve the beautiful rural county we call home and limit data centers to the Planning Commission CDI-OZ recommendations.

Data centers at the East Alco site are an appropriate use for a former industrial area, but expanding them to include much more unspoiled and productive farmland is short-sighted, especially if we can't provide power or water to them without bankrupting ourselves.

The ineffective oversight of the present data center development makes it unacceptable to allow too many more data centers since the consequences may be fiscally and environmentally detrimental.

The Planning Commission made thoughtful recommendations about including the Windridge and Noffsinger properties in the CDI-OZ, and I support that recommendation.

We all need data centers, but the proposed CD-OZ is more than enough.

Thanks for listening!

Sincerely,

Mary Ellen Perry

8410 Peters Rd

Frederick, MD

21704

Sent from my iPhone

From: Charles Zitrick <charles.zitrick@gmail.com>
Sent: Sunday, December 14, 2025 4:18 PM
To: Council Members <CouncilMembers@FrederickCountyMD.gov>
Subject: End the Data Center Overlay

[EXTERNAL EMAIL]

County Council Members,

I am resident at 5600 Calvert Dr., Frederick, MD 21703. If you look at my address, my neighborhood, Windsor Estates, is in the crosshairs of the Data Center Overlay plan.

You have received a steady flood of negative comments about this data center plan. I'll state my most important point first as I am not sure you'll read my whole letter. My message is this, "If it looks too good to be true, it is." The assurance of fast and easy tax revenue for the County is simply too good to be true...and not worth the negative impacts.

I'll share three links of articles published in the past two months as a small sample that demonstrate our concerns.

[Harvard Business Review](#) "Mitigating the Public Health Impacts of AI Data Centers"

[Rolling Stone](#): "The Precedent is Flint: How Oregon's Data Center Boom is Supercharging a Water Crisis"

[Financial Review](#): "Amazon Data Centers in US linked to 'rare cancers and miscarriages'"

The specifics listed in those articles above, and many others, are not present in the happy little flyers being sent by the Data Center Alliance of Maryland.

Our request is a simple one, and matches the suggestion of the County Planning Commission; do not extend the plan north beyond the original Eastalco site. Let the project already approved finish, put a 5 year moratorium on new data centers, and see just how perverse the negative impacts will be. Our health, our wells, our well being, our children's health, and our sense of community are not worth supposedly easy tax money.

I'll keep my letter brief because I'm sure by now you realize that the residents of Frederick County do not want these data centers. Do you value our health, well being, property value, peace of mind, and sense of community? Or do you believe that "easy" tax dollars are worth chasing?

Please make the right choice and end this nightmare.

Charles Zitrick

Sent from my iPhone

From: Sonia Demiray <sonia@demirayink.com>
Sent: Friday, December 12, 2025 2:29 PM
To: County Executive <CountyExecutive@FrederickCountyMD.gov>; Council Members <CouncilMembers@FrederickCountyMD.gov>
Cc: Planning Commission <PlanningCommission@FrederickCountyMD.gov>
Subject: Comment on Critical Digital Infrastructure Overlay and Proposed Zoning Map Amendments

[EXTERNAL EMAIL]

Dear Members of the Frederick County Council-

On December 16 and 23, County Council Members will hold public hearings on the critical infrastructure, its proposed zoning map amendments, and potentially intend to make a final decision on the actual area-size and location of data centers in Frederick County. On behalf of Frederick County and Maryland members of the Climate Communications Coalition, we urge you to pause. Please do not make any final decision until we have implemented a full environmental impact and viability study for each potential data center, in addition to any technology that could reduce their impact on our communities. These studies will cover air, noise, and light pollution, water and electricity use, electricity price hikes to Frederick Residents and Marylanders, in addition to the loss of land and property values. We are expecting an override of the Governor's misguided Veto of the Data Center Impact Study Bill proposed by Senator Lewis-Young (SB116/HB270), which will shed light on the energy implications, electrical infrastructure, in addition to air and water impact concerns. This impact study bill is common sense and bipartisan. Frederick Residents deserve a cautious and responsible implementation of any new infrastructure that will have an outsized impact on our homes, water, electric bills, farms, and businesses.

In addition to pausing to have enough data to make an informed decision, we urge that any data center development:

- 1) Heed the Frederick County Planning Commission's recommendations to limit the area of the Adamstown Quantum Site to its present size, as also loudly and repeatedly asked for by your constituents;
- 2) Require that data centers pay for their own transmission lines and clean energy generation - while our bills are skyrocketing, the trillion-dollar AI industry gets a free pass, and our vital clean energy transition is being upended by their needs; and,
- 3) Demand that any data center and their occupants use batteries as backup, not diesel generators. Regarding generators, we ask that you deny Amazon's application to install 100 diesel generators which necessarily will operate frequently (or constantly) until the grid is up to par. These fumes will travel to surrounding Adamstown, Buckeystown, and City of Frederick, in addition to the adjacent schools and retirement homes. "Exhaust from diesel engines brings a complex mixture of soot and gases to roadways (and nearby homes), cities, farms, and other places. Health concerns about diesel exhaust relate not only to cancer, but also to other health problems such as lung and heart diseases." I urge

you to read about all the threats to our health from diesel fumes listed by the American Cancer Association here:

<https://www.cancer.org/cancer/risk-prevention/chemicals/diesel-exhaust-and-cancer.html>

Finally, the County Council [Charter](#) Article #3 states that: "In accordance with Section 202 of this Charter, the Council may enact public local laws for the peace, good government, health, safety or welfare of the County and on all subjects that have been delegated to the County under the Maryland Constitution and by the laws of the State." We ask that you put the health, safety, and welfare of Frederick County Residents above potential- still unknown- net profits from disruptive data centers.

Respectfully,
Sonia Demiray
Executive Director, Climate Communications Coalition
Resident of Petersville, Frederick County, MD

Sonia Demiray
Climate Communications Coalition
202-744-2948
ClimateCC.org

From: Mary Perry <perry.mary.106@gmail.com>
Sent: Monday, December 15, 2025 1:58 PM
To: Council Members <CouncilMembers@FrederickCountyMD.gov>
Cc: County Executive <CountyExecutive@FrederickCountyMD.gov>; Planning Commission <PlanningCommission@FrederickCountyMD.gov>
Subject: Enough is enough

[EXTERNAL EMAIL]

Dear Frederick County Council Members,
Please preserve the beautiful rural county we call home and limit data centers to the Planning Commission CDI-OZ recommendations.

Data centers at the East Alco site are an appropriate use for a former industrial area, but expanding them to include much more unspoiled and productive farmland is short-sighted, especially if we can't provide power or water to them without bankrupting ourselves.

The ineffective oversight of the present data center development makes it unacceptable to allow too many more data centers since the consequences may be fiscally and environmentally detrimental.

The Planning Commission made thoughtful recommendations about including the Windridge and Noffsinger properties in the CDI-OZ, and I support that recommendation.

We all need data centers, but the proposed CD-OZ is more than enough.

Thanks for listening!

Sincerely,
Mary Ellen Perry
8410 Peters Rd
Frederick, MD
21704
Sent from my iPhone

From: Sharon Garlena <sharong0722@gmail.com>
Sent: Monday, December 15, 2025 1:53 PM
To: Council Members <CouncilMembers@FrederickCountyMD.gov>; County Executive <CountyExecutive@FrederickCountyMD.gov>; Planning Commission <PlanningCommission@FrederickCountyMD.gov>
Subject: Fwd: Data center

[EXTERNAL EMAIL]

I provide a link with information regarding how a report linked Amazon data centers to miscarriages and rare cancers, drawing concerns about data centers' presence in central Ohio. <https://www.nbc4i.com/.../report-links-data-center-to.../...>

From: Sharon Garlena <sharong0722@gmail.com>
Sent: Wednesday, October 15, 2025 8:39 AM
To: Planning Commission <PlanningCommission@FrederickCountyMD.gov>
Subject: Data center

[EXTERNAL EMAIL]

Frederick County Planning Commission
30 N. Market Street
Frederick, MD 21701

RE: Opposition to the Expansion of the Data Center in Frederick County

Dear Members of the Planning Commission,

I am writing to express my strong opposition to the proposed expansion of the data center within Frederick County, Maryland. While I understand the need for technological infrastructure in our increasingly digital world, the environmental, economic, and community-related consequences of this project outweigh its proposed benefits.

1. Environmental Concerns

Data centers are extremely energy- and water-intensive. Given the growing concerns about climate change and the local push toward sustainable development, expanding such facilities runs counter to the county's stated environmental goals. Data centers often require vast amounts of electricity, potentially drawing from non-renewable sources and stressing local grids. Moreover, these facilities sometimes use millions of gallons of water for cooling, which can strain our local water resources, especially during dry seasons.

2. Noise and Light Pollution

Large data centers operate 24/7 and often generate significant noise from cooling systems and backup generators. The constant humming and operational sounds can negatively impact nearby residents' quality of life. Additionally, light pollution from facility operations can disturb both human and animal habitats, further disrupting the natural environment and rural character of Frederick County.

3. Minimal Local Economic Benefit

While proponents argue that data centers bring jobs and investment, the reality is that these facilities are typically automated and require relatively few long-term employees. The jobs they do create are often specialized and may not benefit local residents. Compared to the amount of land and resources they consume, the return on community investment is minimal.

4. Land Use and Community Impact

Frederick County has long been appreciated for its rural charm, natural beauty, and small-town character. Expanding industrial infrastructure like data centers could set a precedent that encourages more large-scale, high-impact developments. This may lead to further suburban sprawl, loss of agricultural land, and erosion of the county's identity and appeal.

5. Precedent for Unchecked Growth

Approving this expansion may open the floodgates for future development that is incompatible with the county's long-term vision. Our community must consider not just short-term gains but the long-term consequences of allowing large-scale industrial facilities in or near residential and rural areas.

For these reasons, I respectfully urge the Frederick County Planning Commission to reject the proposed expansion of the data center and to prioritize projects that align more closely with the county's values of sustainability, responsible growth, and community well-being.

Thank you for your consideration.

Sincerely,

Sharon Garlena
Frederick, MD 21703
sharong0722@gmail.com

From: Lydon Blood <lydonb@icloud.com>
Sent: Monday, December 15, 2025 1:25 PM
To: lydonb@icloud.com
Subject: Reject the Expanded Data Center Overlay Proposal

[EXTERNAL EMAIL]

Hello Frederick County Officials,

I am writing to you today to express concern about data centers and the expanded overlay zone.

As I understand it, the currently approved location will use as much power as **two Baltimores**. With energy prices continuing to increase and Maryland not providing enough electricity already, how can this area sustain the currently approved location and additional data centers? These costs will undoubtedly be passed along to residents in the county. Due to the national administration's idiotic economic policy, people on average are paying higher costs for goods all around. How can people continue to pay more and more for *everything*. The environmental costs of additional data centers massively concerning, too. The existing facility will have a plethora of diesel generators and will use a massive amount of water. What impacts will this have to our local water system and our air quality? How will it impact our local farmers? Asthma is already proven to be a side effect of living near industrial zones. How will people, and especially children, fare with more and more data centers?

Corporations have become ultra wealthy on the backs of working class labor and the fact that they pay hardly any tax compared to what average citizens pay. For all the fear mongering in America about "socialism," people do not bat an eye when corporations receive massive handouts or when special laws or zones are approved for their business or when the negative environmental costs of business decisions are socialized. Socialism for the rich is what we see all over the country and now, big tech is here to put their boot on our necks. As elected officials, you have a responsibility to do what is best for those in Frederick. I don't see how you can responsibly approve development for something that has so many unanswered questions that will impact all of Frederick.

While the potential tax revenue being dangled in front of public officials is appealing and could help our drastically underfunded school system or help improve existing infrastructure, the skyrocketing electric bills, environmental and health impacts are majorly concerning. These concerns far outweigh any potential benefits of additional data centers. I call on you to strongly reject the expanded overlay zone proposal.

Thank you,
Lydon

From: Elizabeth Law <bettybob1758@gmail.com>
Sent: Monday, December 15, 2025 11:44 AM
To: Council Members <CouncilMembers@FrederickCountyMD.gov>; County Executive <CountyExecutive@FrederickCountyMD.gov>; Planning Commission <PlanningCommission@FrederickCountyMD.gov>; Victoria Venable <vvenable216@gmail.com>; Murray, Patrick <PMurray@FrederickCountyMD.gov>
Subject: Comments: Dec. 16 County Council Public Comments on CDI-ZO

[EXTERNAL EMAIL]

County Council Members and all,

Data Center Frontier has an excellent article discussing the most likely areas for data center expansion.

Despite the desperation of lobbyists like the Maryland Tech Council, the industry is not clamoring to come to Frederick County. This is why it is prudent to limit the CDI Zone to the present Eastalco site or at most the expanded area recommended by the Planning Council.

The Data Center Power Squeeze - Mapping the Real Limits of AI Scale Growth

Key Highlights

- AI workloads are significantly more energy-intensive, with data center electricity consumption expected to reach 134 GW by 2030, nearly tripling current levels.
- Mapping tools like national capacity maps, hosting capacity maps, and real-time congestion dashboards are vital for site selection and risk management amid grid constraints.
- **Regions such as Pennsylvania, Texas, Atlanta, Ohio, and emerging markets like Phoenix and Las Vegas are identified as strategic hubs due to their power potential, infrastructure, and untapped resources.**
- The industry must innovate in energy sourcing, including utilizing underused assets like non-powered dams and retired industrial sites, to meet future demand sustainably.
- Overcoming grid bottlenecks requires collaboration between public and private sectors, policy innovation, and technological advancements to unlock new power sources and expand capacity.

It is easy to read the entire article once you have joined *Data Center Frontier* with a simple sign in.

<https://www.datacenterfrontier.com/energy/article/55333263/the-data-center-power-squeeze-mapping-the-real-limits-of-ai-scale-growth>

Thank you,
Betty Law
1758 Wheyfield Dr.
Frederick, MD 21701

From: msimpson2005 bennettscreekfarm.com <msimpson2005@bennettscreekfarm.com>
Sent: Monday, December 15, 2025 12:55 PM
To: Council Members <CouncilMembers@FrederickCountyMD.gov>
Subject: I oppose Data Center expansion in Frederick County

[EXTERNAL EMAIL]

Hello,

I am writing to voice my opposition to expanding data centers in Frederick County beyond the current location in the East Alco area.

I question the promises of economic growth from data centers. To me, they result in noise, massive energy consumption, and few local jobs.

I am not saying that we halt AI development, but we should pursue it responsibly. For data centers to truly benefit communities, there should be investments in infrastructure that help everyone. I would like to see proof that data centers won't drive up costs for those of us living in Frederick County.

I am opposed to placing date centers near residential areas. Doing so will bring in noise 24/7 and increase our utility bills, as well as reducing the value of our properties. More powerlines will be required, and who knows where they will go? Will that become a future issue for residents?

It makes me wonder why Frederick County is pushing so hard to bring in an industry with so few pros and with far more cons. Please do not allow data center sprawl in our beautiful county. Please follow the prudent recommendations of the Planning Committee and do not allow data centers to take over Frederick County.

Thank you, Margy Simpson
2149 Thurston Road. Frederick MD 21704

From: Elizabeth Law <bettybob1758@gmail.com>
Sent: Monday, December 15, 2025 1:27 PM
To: Council Members <CouncilMembers@FrederickCountyMD.gov>; County Executive <CountyExecutive@FrederickCountyMD.gov>; Planning Commission <PlanningCommission@FrederickCountyMD.gov>
Cc: Victoria Venable <vvenable216@gmail.com>; Murray, Patrick <PMurray@FrederickCountyMD.gov>
Subject: Public Comments - Dec 16 County Council Meeting on CDI-ZO- Use of BESS to Reduce Use of Emergency Diesel Generators

[EXTERNAL EMAIL]

Council President Brad Young, Vice President Kavonte Duckett and Council Members, I appeal to you to:

- 1 - Limit the size of the CDI Zone to its present size or at most to the size recommended by the Planning Commission and
- 2 - Incorporate language into every CDI ordinance stating that emergency power will include backup energy storage systems or BESS.

The data center landscape has changed drastically since 2021 when the previous County Executive welcomed Quantum Frederick to the Eastalco site.

Both the data center industry and the power industry are massive and complicated. These two systems are being forced into one system. There will be growing pains with winners and losers.

AI chips demand ever more power and infrastructure. Equipment delivery time and cost keeps increasing due to demand. Industry leaders are stampeding to generating states. All this extends the timeline for full buildout of the existing site at Adamstown. FERC is determining a new national structure for delivering power to data centers and for allocating the enormous costs more fairly. Restructuring will take time and introduces uncertainty. Smart players will step back to see how this plays out before investing. This means more slowdown.

This is not the time for expansion. This is the time to limit the CDI Zone to its present size or at most add only the properties recommended by the Planning Commission. Nothing prevents a future county council from expanding the CDI Zone if this experiment proves to be of true benefit to the community.

Limiting the size of the CDI zone can be to our advantage. It can give us time to replace one of the most obnoxious and unwelcome aspects of data centers: emergency diesel generators.

Replacing diesel generators with BESS – Backup Energy Storage Systems

We need to incorporate battery storage systems into all future data center sites by adding this requirement into all CDI ordinances. Battery technology is advancing rapidly; providing more emergency power for longer times and with increasing safety. Many manufacturers offer a variety of battery systems. Who knows what the battery storage capability will be in 5 years?

In your zeal to bring as many data centers to Frederick County as possible, the County Council has repeatedly evaded the fact that there is an elementary school less than 2000 feet from an industrial site that may someday contain as many as 1000 diesel generators, each equivalent to those used on railroad locomotives.

In the short term, there will be at least 100 such machines near the Carroll Manor Elementary School. These devices will emit copious amounts of pollution, which is well

known to cause serious respiratory problems and even cancers in developing children. The excessive noise can damage hearing, especially in young children. It is negligence not to incorporate a solution that would reduce these risks. Should even a small number of children be affected, the parents could bring a lawsuit against the data center, the property owner and Frederick County for having permitted such an industrial scale operation in proximity to an elementary school.

Especially if you truly care about our children you need to open your mind to including emergency battery storage systems as part of the emergency power at all future data centers.

Battery Energy Storage Systems are now available that can supply emergency power in excess of 4 hours. Most outages are short. The batteries would prevent the diesel generators from being called during such short outages.

As a sole source of emergency power, while the batteries are supplying power to the data center, processing can be transferred to a sister data center that is outside the outage area. With the data center reduced to only critical functions, such as maintaining memory, a minimum of diesel generators would be needed. This reduces the number and frequency of diesel generators running at full load.

In a hybrid system with diesel generators, the batteries could be used for the first 4 hours, then power could transfer to the diesel generators. This would prevent 4 hours of diesel fumes and particulates from entering the atmosphere. **This is especially important considering the placement of data centers next to schools and residential areas.**

The advantages to the public and the environment are obvious. Batteries are silent and non-polluting. They do not need tanks holding 20,000 gallons of diesel fuel for each building or the regular truck travel on rural roads to deliver the diesel fuel.

This will mean more jobs for electrical workers.

Taking these actions would show due diligence by the Industry and county government. You could be protecting yourself from the cost of a negligence lawsuit resulting from ignoring a safer emergency power alternative.

Please –

1 - Limit the CDI zone to the present Eastalco footprint or only add properties recommended by the Planning Commission

2 - Incorporate language into every CDI ordinance stating that emergency power will include battery storage systems.

Thank you,

Elizabeth Law, P.E. (retired)

1758 Wheyfield Dr.

Frederick, Maryland 21701

[Solving for Data Center Power Needs with Battery Energy Storage | Flexgen](#)

[How Battery Energy Storage Systems \(BESS\) power data centers - Schneider Electric Blog](#)

From: Judy Rosey <jprosey@hotmail.com>
Sent: Monday, December 15, 2025 10:13 AM
To: Knapp, Renee <RKnapp@FrederickCountyMD.gov>; Young, Brad <BYoung@FrederickCountyMD.gov>; County Executive <CountyExecutive@FrederickCountyMD.gov>; Council Members <CouncilMembers@FrederickCountyMD.gov>; Donald, Jerry <JDonald@FrederickCountyMD.gov>; McKay, Steve <SMcKay@FrederickCountyMD.gov>; Keegan-Ayer, MC <MCKeegan-Ayer@FrederickCountyMD.gov>; Duckett, Kavonte <KDuckett@FrederickCountyMD.gov>; Carter, Mason <MCarter@FrederickCountyMD.gov>
Subject: Vote NO on Overlay and Rezoning for Suzanne Irrevocable Trust

[EXTERNAL EMAIL]

Dear council members,

I am one of the residents living on East Basford Road. I am not going to repeat all of the information that several of my neighbors have written about why this property should not be rezoned. Besides, they are much more eloquent than I am and they have done a great job researching all of the history of this area. However, I wanted you to know where I stand as well. I have friends that come to visit me just because they want to sit on my porch and see the beautiful views of the surrounding farmland that they don't have at their homes. My family moved here from Montgomery County in 2004, largely because it was rural and reminded me of where I grew up in Pennsylvania and where my husband grew up in Kansas. When we had to fight against the solar farm a few years ago, I was so very happy that the county council understood us and backed us up. This time there is much more at stake for us. We teach our children to keep their promises unless it hurts someone. I'm sure you do as well. I hope that you will keep your promises to protect this land that is marked as a priority preservation area for agriculture. You know that if you were living here, you would not vote to rezone this area. If I'm not mistaken, there is a lot of untouched land in Frederick County that could be used for industrial use. Please do not destroy our area. Thank you.

Judy Rosey

From: Sabrina Williams <sabrinaylynnell221@gmail.com>
Sent: Monday, December 15, 2025 9:41 AM
To: Council Members <CouncilMembers@FrederickCountyMD.gov>; County Executive <CountyExecutive@FrederickCountyMD.gov>; Planning Commission <PlanningCommission@FrederickCountyMD.gov>
Subject: Please Reject the Proposed Data Center Expansion!

[EXTERNAL EMAIL]

Dear Frederick County Executive and Members of the County Council,

My name is Sabrina Williams, and I am a Frederick County resident/voter/constituent. I'm writing to urge you to **reject the proposal to expand zoning for data centers in Frederick County.**

This expansion would have profound and lasting consequences for the county's environmental health, economic stability, and overall quality of life. The primary beneficiaries of this proposal are large technology corporations whose interests are not aligned with those of the people who live and work here. We, the residents, are the ones who will be here to deal with the long-term damage once construction is complete.

What is being offered in return is a small fraction of the profits these corporations stand to gain. To date, there has been **no independent, objective economic analysis demonstrating meaningful benefits to county residents.** Meanwhile, the proposal would eliminate more than 1,000 acres of protected and essential land, undoing well over a decade of environmental preservation and planning. The county also lacks the tools to adequately regulate the environmental impacts of these facilities, particularly with respect to water usage, energy consumption, and long-term sustainability.

Perhaps most concerning, there is **no credible plan to offset the enormous energy demand** of the existing data center complex—whose usage is already comparable to that of two cities the size of Baltimore. Expanding this footprint would introduce a massive new strain on the energy grid, likely driving already-high energy costs even higher for residents and small businesses. We are being asked to accept significant environmental degradation, higher costs of living, and irreversible land loss without a clear understanding of the true economic impact or a viable plan to mitigate the harm.

This is not responsible planning. It is a lopsided gamble that sacrifices protected land, environmental progress, and long-term community wellbeing in exchange for short-term, uncertain gains.

Your responsibility is to serve the people of Frederick County and to ensure this remains a healthy, vibrant place for working families, not just today, but for generations to come. This

proposal does not meet that standard. It will make life harder, more expensive, and less sustainable for the very people you were elected to represent.

I respectfully urge you to reject this expansion and to take meaningful action to prevent further damage to our county.

Sincerely,

/s/

Sabrina Williams
Ballenger Creek resident and voter
(240) 475-7649

From: Elyse Wilson <elysewilsonkhk@gmail.com>
Sent: Sunday, December 14, 2025 7:48 PM
To: Council Members <CouncilMembers@FrederickCountyMD.gov>; McKay, Steve <SMcKay@FrederickCountyMD.gov>; Donald, Jerry <JDonald@FrederickCountyMD.gov>; Knapp, Renee <RKnapp@FrederickCountyMD.gov>; Young, Brad <BYoung@FrederickCountyMD.gov>; Duckett, Kavonte <KDuckett@FrederickCountyMD.gov>; Carter, Mason <MCarter@FrederickCountyMD.gov>; Keegan-Ayer, MC <MCKeegan-Ayer@FrederickCountyMD.gov>
Cc: Jim Ballard <comusmail-yahoo@yahoo.com>; Elizabeth Law <bettybob1758@gmail.com>; Theresa Furnari <tafurnari10@gmail.com>; Elizabeth Bauer <cdnlizard@gmail.com>; William Steigelmann <bsteig@aol.com>; Grayzeck Ed <egrayzec833@gmail.com>; Kevin Sellner <ksellner@gmail.com>; Steve Black <steveblack2313@gmail.com>; Todd Jones-Prettyman <deco3899@hotmail.com>; Brandon Hill <bhill@rollingdoorsllc.com>; Patrice Gallagher <pgallj@aol.com>; Kai Hagen <kaihagen@gmail.com>; Karen Russell <ccwgfredco@gmail.com>; rkaltenbaugh <rkaltenbaugh@mac.com>; Mary LaRocco <mellenlaroc@gmail.com>; susan lauterbach <salauterbach@comcast.net>; Renee Hamidi <renee@thevpc.org>; David Lillard <david.lillard@catoctinlandtrust.org>; Faith Klareich <faith@klareich.com>; James Wagner <james.wagner@gmail.com>; steven jakubczyk <jakubczyksteven@gmail.com>; Marjorie Rosensweig <marjorierosensweig@gmail.com>; Mark Faris <mark.faris@stopmprp.org>; Joanne Frederick <joanne.frederick@stopmprp.org>; Brandon Moffitt <bmoffit1@gmail.com>; Dave Arndt <roseca2010@gmail.com>; Jenny Teeter <jennyteeter@comcast.net>; Betsy McFarland <betsymcfarland@gmail.com>; Shawn McIntosh <smhasler14@gmail.com>; glenschulze <glenschulze@comcast.net>; Gallegos Carl <gallegos.carl332@gmail.com>; James Coulombe <duetto14@gmail.com>; Grayscale2 <grayscale2@protonmail.com>; Brian Sweeney <briansweeney8911@gmail.com>; Anneblack515@gmail.com; Sonia Demiray <soniademiray@climatecc.org>; Bill Crouch <bcrouch@conservationfund.org>; CJW Date Center Work Group <cjw-data-center-group@googlegroups.com>; twheeler@bayjournal.com; Jennifer Alcorn <friendsofjennalcorn@gmail.com>; Jerry Donald <jerrydonald371@gmail.com>; Scott Lasher <scott.lasher@yahoo.com>; Elyse Wilson <elysewilsonkhk@gmail.com>; PHM <phmichael@comcast.net>; pbrehm <pbrehm@comcast.net>; Laila Riazi <lailariazi@gmail.com>; Sarah Hempel Irani <hello@sarahforfrederick.com>; Hope Green <hope.green76@yahoo.com>; Gene Butler <rollbackfarmer@comcast.net>; Paula damico-Hollewa <pdhollewa@yahoo.com>; FRANK HOLLEWA <fjhollewa@gmail.com>; Linda Everett <linda@edgedesigngroupllc.com>; Mary Dague <mhdague@gmail.com>; santahsu@comcast.net
Subject: IMMEDIATE VOTE WARNING: The Documented Political Suicide regarding the CDI Overlay Vote

[EXTERNAL EMAIL]

Dear Council Members,

I am writing as a constituent to present you with an **irrefutable political risk assessment** ahead of the vote on the CDI Overlay expansion.

A vote to approve this massive expansion now is an act of **political, procedural, and environmental recklessness** that has a proven track record of ending political careers.

1. The Clear Electoral Cost: A List of Political Casualties

The link between a pro-data center vote and voter punishment is now a central reality in U.S. politics. Politicians who have prioritized tech industry subsidies over constituent well-being have been swiftly and decisively removed from office:

Official Name (Pro-DC Stance)	Position Lost (State/County)	New/Winning Anti-DC Candidate	Political Driver & Outcome
Ann Wheeler	Chair-at-Large, Prince William County Board of Supervisors, Virginia	Deshundra Jefferson (Challenger)	Lost the primary after pushing the massive Digital Gateway project. Voters punished her for prioritizing industry sprawl over community quality of life.
Geary Higgins	Delegate, House of Delegates (District 30), Virginia	John McAuliff (Challenger)	McAuliff flipped the seat by making the " Data Center Geary " campaign a laser-focus on his opponent's industry ties and the direct impact on utility bills.
Tim Echols	Public Service Commissioner (PSC), Georgia	Alicia Johnson (Challenger)	Lost a statewide race. PSC incumbents were penalized for approving rate hikes needed to fund massive grid upgrades for data centers, demonstrating the power of the " My Power Bill is Too High " message.

Official Name (Pro-DC Stance)	Position Lost (State/County)	New/Winning Anti-DC Candidate	Political Driver & Outcome
Fitz Johnson	Public Service Commissioner (PSC), Georgia	Peter Hubbard (Challenger)	Lost a statewide race. Voters issued a clear rebuke against the regulatory board that was seen as prioritizing corporate energy demands over residential consumers.
Entire Town Council	Town Council, Warrenton, Virginia	New Anti-DC Majority	The entire governing body was voted out in the November 2024 election by highly organized residents, resulting in a 100% political turnover because of their support for a data center project.
Other Pro-DC Supervisors	Prince William County Board of Supervisors, Virginia	Multiple Anti-DC Challengers	The political turbulence over the Digital Gateway led to other incumbents facing aggressive opposition or deciding not to run, realizing the

Official Name (Pro-DC Stance)	Position Lost (State/County)	New/Winning Anti-DC Candidate	Political Driver & Outcome
			political cost was too high.

2. Procedural Recklessness and Health Risks

You propose expanding the CDI Overlay by approximately **2,200 acres** when the initial **1,600 acres** are not even up and running!!

- **Failure of Due Diligence:** The Council is proceeding with **NO verifiable, objective data** confirming that Frederick County has adequate power or water capacity for the first phase, let alone the expanded zone.
- **Procedural Scandal:** The Council is aware that **Maryland Senator Karen Lewis Young** and other legislators are actively working in Annapolis, including on **December 16th**, to **override Governor Wes Moore's veto** of the essential **Data Center Impact Analysis Bill**. Pushing this vote through now, before that mandatory, state-level analysis is secured, confirms the Council is afraid of what the data will reveal.
- **Cancer-Causing Pollution:** You are committing the community to the long-term, unmitigated health risks associated with the massive **diesel generators** that will emit **cancer-causing Particulate Matter and Nitrogen Oxides** into our air, increasing local healthcare burdens.

3. Integrity and Economic Deception

- **Developer Integrity is Compromised:** The community is aware that **Rowan** lied about the project's benefits and is planning to **sell the company immediately after securing approval**. Voting "Yes" now confirms the Council supports a company that has acted in **bad faith towards the residents**.
- **The Job Deception:** You are choosing temporary construction jobs and 25 permanent maintenance jobs over high-value, long-term employment from **clean-tech manufacturing** or R&D that would provide **hundreds of permanent, high-wage jobs**.

The voice of the people is clear. A vote to expand the CDI Overlay is an act of political self-destruction that sacrifices the permanent well-being of Frederick County for a short-term, compromised gain. We expect your vote to align with the interests of the citizens you were elected to represent.

Sincerely,
Elyse Wilson

Adamstown MD

CC and BCC: The Broader Adamstown and South Frederick Community

From: kellyod518@aol.com <kellyod518@aol.com>
Sent: Sunday, December 14, 2025 9:35 PM
To: Knapp, Renee <RKnapp@FrederickCountyMD.gov>; Young, Brad <BYoung@FrederickCountyMD.gov>; County Executive <CountyExecutive@FrederickCountyMD.gov>; Council Members <CouncilMembers@FrederickCountyMD.gov>; Donald, Jerry <JDonald@FrederickCountyMD.gov>; McKay, Steve <SMcKay@FrederickCountyMD.gov>; Keegan-Ayer, MC <MCKeegan-Ayer@FrederickCountyMD.gov>; Duckett, Kavonte <KDuckett@FrederickCountyMD.gov>; Carter, Mason <MCarter@FrederickCountyMD.gov>
Cc: vicki07@hotmail.com; whitesands12@gmail.com; santahsu@comcast.net; phmichael@comcast.net; olssons@gmail.com; Dogmom65412@gmail.com; billbeam4th@gmail.com; briansweeney8911@gmail.com; coseycool@gmail.com; dale.franklin@yahoo.com; Eschaub101@aol.com; elysewilsonkhk@gmail.com; Jackqle@hotmail.com; jason_norris301@hotmail.com; Rymer67@msn.com; csanddenterprisesllc@gmail.com; jprosey@hotmail.com; kellyod518@aol.com; 1momof5@gmail.com; beamery@comcast.net; rachel.frymark@gmail.com; gillie111@gmail.com; satuomey@comcast.net; steveblack2313@gmail.com; ctv1027@gmail.com; tonylchecchia@gmail.com; vickimichael@comcast.net; wsrkwest@gmail.com
Subject: Vote NO on Overlay and Rezoning for Suzanne Irrevocable Trust

[EXTERNAL EMAIL]

Dear Frederick County Councilmembers,

I have lived in Frederick County since 2011, when my husband and I purchased our home on East Basford Road. Years before that, we would visit friends here and always felt drawn to Adamstown because of the open space, the beautiful rural landscape, the peace and quiet and the wildlife. We both grew up in Montgomery County, and finding the home we're in now felt like a once-in-a-lifetime opportunity. Living here and raising our family here has truly been a dream.

But things are incredibly really fast in this community. Just miles down the road, the Quantum Frederick data center campus is under construction. I am not anti-development, and I understand that the Eastalco site was already zoned industrial. What I do not understand is why, before that project is anywhere near completion — and before we even know its true impacts — this expansion is being pushed to cover several hundred more acres. The driving force seems to be the promise of tax revenue, which is not even well defined. Meanwhile, the people who actually live here are the ones who will suffer from the noise, the traffic, the water contamination risks, diminished property values and the loss of the rural character that drew us all here in the first place.

Many of the parcels shown on the proposed overlay map are within Rural Legacy Areas and Priority Preservation Areas. The Data Center Workgroup report that County Executive Fitzwater approved clearly states that data centers are not appropriate in RLAs, PPAs, or agricultural preservation zones. Yet several of these protected parcels are on the maps. These lands were protected for a reason, and moving forward with this proposal contradicts the county's own planning guidance and preservation commitments. Also this idea of "replacing" preserved land taken for the overlay with five acres of preservation in another

part of the county is yet another blow to our current situation. We have a lot to lose and nothing to gain here. How is this fair?

I am also struggling to understand why the entire allowable “1%” of CDI development is being concentrated exclusively in and around Adamstown, one of the smallest communities in the county. Adamstown is only 0.16% of the county’s total land area, yet the overlay would make our area eligible for nearly four times the size of Adamstown for data center development. This is inequitable and unreasonable. The maps really do not show what this actually looks like on the ground. I drive past these farms and fields just about every day, and it makes me sick to imagine these scenic, historic, rural properties replaced with huge, ugly concrete boxes.

I want to specifically comment too on the request from the Suzanne Irrevocable Trust to rezone and be included in the overlay. This is one that hits closer, as this property backs up directly to my backyard. This land also has RLA and PPA designations that have existed since 1998 and 2010. Past County Councils have rejected every industrial proposal here since 2000 because the land has long been recognized as incompatible with industrial use, including the original rezoning request from the Suzanne Trust itself that was denied once before, in 2023. Nothing about the land has changed since. And when this property was sold, the listing made clear that its uses were limited because of these preservation designations, so this was known from the start.

There are so many other reasons this property should be denied for both rezoning and overlay inclusion:

- It contains prime farmland soils. Nearly 70% of the site is classified as Prime Farmland or Farmland of Statewide Importance.
- It lies partly in a FEMA floodplain, with two creeks running through it, one of which is protected under the Maryland CREP program.
- It holds historic significance, including gravestones dating back to the 1700s and its location along the Hallowed Ground route. Access to the property is from East Basford Road and Ballenger Creek Road. East Basford is narrow and tar and chipped to preserve its historic character and is not meant for heavy truck traffic. Ballenger Creek Road is also narrow and winding.
- The applicants are not just asking for data centers, they have also indicated a desire to build a microgrid battery facility and an anaerobic digestion plant, which poses serious fire, air-quality and environmental hazards.
- Our homes depend entirely on private wells. The water demand for data centers is enormous, and even the construction phase at Quantum has already affected wells nearby. Many of us are genuinely afraid for our water, our health and safety, our property values and for the future of this community.
- We know that data centers require massive new power infrastructure. We fear this will become a domino effect — one industrial approval leading to the next, and then another.

You have a responsibility to uphold Frederick County’s planning principles and preservation designations and that means:

1. Voting NO on the CDI Overlay as currently drawn, AND
2. Voting NO on the rezoning and overlay request for the Suzanne Irrevocable Trust.

If the Council chooses to move forward with any form of overlay at all, the absolute minimum standard should be what the Planning Commission recommended: exclude all parcels in PPA and RLA and protect the Suzanne property and surrounding farmland from industrial development.

Adamstown is a small, rural community. We cannot and should not have to bear the entire burden of the county's CDI allowance. This is sprawl, right here in Adamstown. Please protect the RLA and PPAs you have promised to steward, and the residents who call this place home. Please vote NO.

Thank you for your time and consideration.

Sincerely,

Kelly Le
4721 East Basford Road
Frederick, MD 21703

From: Darlene DeFrehn <dmdefrehn@gmail.com>
Sent: Sunday, December 14, 2025 11:52 PM
To: Council Members <CouncilMembers@FrederickCountyMD.gov>; County Executive <CountyExecutive@FrederickCountyMD.gov>; Planning Commission <PlanningCommission@FrederickCountyMD.gov>
Subject: Stop the Overlay!

[EXTERNAL EMAIL]

Dear Council Members, County Executive, and Planning Commission:

Please, Stop the Overlay! Please don't make a decision now that will allow the Data Centers to move in and destroy our community and Frederick County. We do not believe that there are benefits to our area. There are not adequate roads for the huge number of oversized vehicles to roll through the community. I beg each of you to drive down the roads around the Data Centers. Mountville, Ballenger Creek, New Design, and Buckeystown Pike around the Data Center. Take a look at the lack of shoulders on the roads and ask yourself where you would go if a large construction vehicle was coming the other direction and taking up a portion of your lane. It is very concerning. I am concerned about public safety.

I am also devastated that the decision to go forward with the Overlay will further lower property values and raise costs of electricity. It will also take away prime agricultural lands that are protected at this time. The added generators is a serious threat to the environment, residents and students at the Carroll Manor Elementary School. These are only a few of many issues.

Please Do Not Sell Us Out for financial gain. STOP the Overlay!

Sincerely,

Darlene DeFrehn
Adamstown resident, concerned citizen, and voter.

--

Darlene M. DeFrehn
5404 George St.
Adamstown, MD 21710

c-301.785.3127

From: Karen Lazo <LazoFamily@comcast.net>
Sent: Monday, December 15, 2025 12:07 AM
To: County Executive <CountyExecutive@FrederickCountyMD.gov>
Subject: STOP THE PERMITS & stop expanding the overlay

[EXTERNAL EMAIL]

To whom it may concern: This data center expansion MUST stop! We are losing our green Frederick County because of financial greed. We don't want those generators added! Stop the permits if the applicant is selling the company!

Thanks for noting my comment! Karen Lazo and Family

From: Austin Dyches <adyches@gmail.com>
Sent: Monday, December 15, 2025 5:56 AM
To: Council Members <CouncilMembers@FrederickCountyMD.gov>; County Executive <CountyExecutive@FrederickCountyMD.gov>; Planning Commission <PlanningCommission@FrederickCountyMD.gov>
Subject: NO to Data Centers

[EXTERNAL EMAIL]

Council,

my name is Austin Dyches. I'm an army intel vet and I live here and work in data/tech for the government. The AI boom is not sustainable and is driven by private capital. These data centers pollute the environment and drive up costs for area residents.

I urge you to take consideration of your local residents' needs **and vote no** on any item brought to the committee which would expand data centers in Frederick Co.

Thanks for your time,
Austin

From: Darren Andrews <Darren@talon-construction.com>
Sent: Monday, December 15, 2025 8:19 AM
To: Council Members <CouncilMembers@FrederickCountyMD.gov>
Subject: STOP DATE CENTER EXPANSION
Good Morning,

I am a resident of Frederick County and have been for over 50 years. Although I was okay with the initial adoption of the data centers on the old Eastalco parcel, primarily because I thought that it would be a good use for a sight whose soil was questionable, I have a much harder time accepting the expansion of the data centers, especially, onto pristine farmland.

I know that many of you on the council are also long time residents of Frederick County. I ask you these same questions. Are data centers a good use of pristine farmland? If you are a long time reside of Frederick County, you'll remember how we used to say that we hope Frederick County never becomes like Montgomery County. Well..... we are approaching this very thing.

Have any of you driven New Design Road and passed the, almost endless shuttling, of possibly undocumented workers back and forth between hotels and the construction site?

I'm not sure if any would be good publicity for re-election if it is found out that many of these workers are undocumented. Does ICE know of these buses bringing in workers to the site?

Regardless of whether these workers are documented or undocumented, we need to say NO to potential further expansion and heed the advice of the planning commission.

Thank you,

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

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



"Fall in love with your home all over again"



From: Carolyn Coelho <carolynlouisecolho@gmail.com>
Sent: Friday, December 12, 2025 4:08 PM
To: Duckett, Kavonte <KDuckett@FrederickCountyMD.gov>; County Executive <CountyExecutive@FrederickCountyMD.gov>; McCarthy, Kathan <KMcCarthy@FrederickCountyMD.gov>; Cherney, Ragen <RCherney@FrederickCountyMD.gov>
Subject: Fwd: Stop the Data Center Expansion and Diesel Generators

[EXTERNAL EMAIL]

----- Forwarded message -----

From: **Carolyn Coelho** <carolynlouisecolho@gmail.com>
Date: Fri, Dec 12, 2025 at 4:04 PM
Subject: Stop the Data Center Expansion and Diesel Generators
To: <jfitzwater@frederickcountymd.gov>

Jessica, Council Members, Kavonte,

I am a 30 year resident of Adamstown and I strongly oppose the expansion of the Data Center and the request for the diesel generators.

The Data Center is a blight on our community. It will destroy our home values, increase our electricity bills, steal our water resources, and pollute our community.

If you let this continue, you will be complicit in poisoning children and wildlife. This egregious decision is ruining my enjoyment of my home and community.

It must be nice for you to return to a home each day that does not contain a Data Center. It must be nice for your children to attend a school that is not being poisoned by one. I wish I could say the same.

I will never vote for you or any politicians who approves of this. Amazon is not a lifelong resident of Frederick County. Their investment is self-serving. They will abandon Frederick when we are no longer profitable, and you will have nothing to show for it. They are not part of this community and we were fine before they came.

Please do not approve the expansion or the generators.

-Carolyn Coelho

From: kmkinsey@comcast.net <kmkinsey@comcast.net>
Sent: Monday, December 15, 2025 9:01 AM
To: Council Members <CouncilMembers@FrederickCountyMD.gov>
Subject: Mobilize Frederick/Comments on CDI Overlay Zone Map

[EXTERNAL EMAIL]

Dear President Young, Vice-President Duckett, and Members of the Council,

In advance of the December 16th hearing on the CDI Overlay Zone Map,

attached are Mobilize Frederick's comments. For the reasons discussed in our comments, we urge you to confine the overlay zone to the existing Quantum Frederick campus for the present.

Thank you for the opportunity to comment on this important matter which is before the Council.

Sincerely,

Kathy Kinsey

Kathy Kinsey

Chair, Government Affairs Committee

Mobilize Frederick

240-608-5954

kmkinsey@comcast.net



December 15, 2025

President Brad Young
Vice-President Kavonté Duckett
Members of the Frederick County Council
Winchester Hall
12 Church Street
Frederick, Maryland 21701

Dear President Young, Vice-President Duckett, and Members of the Council,

As you consider the County Executive's proposal to establish a Critical Digital Infrastructure Overlay Zone, we strongly urge you to confine the Overlay Zone to the existing Quantum Frederick campus. This is the most prudent course of action for the near term. The County currently lacks sufficient information about the long-term net economic benefits, the conversion of agriculturally zoned properties on the County's agricultural preservation goals, and the energy, environmental, climate, and health impacts of data centers to accurately weigh the costs and benefits of hyperscale data center development. Moving ahead too quickly could have far-reaching adverse impacts on the County and the quality of life for its residents.

The Need for a Comprehensive Independent Data Center Impact Study

There is widespread recognition of the need for a comprehensive data center impact study. Data center developers and other proponents of an expanded Overlay Zone often cite job growth and the projected tax revenues generated by data center development as important benefits that warrant expansion of data center development in the County, but these benefits may be illusory. First, construction jobs are temporary, and they comprise a majority of the projected new jobs.¹ Once construction is complete, it is undisputed that

¹ It was noteworthy that testimony from members of the International Brotherhood of Electrical Workers at the December 2nd Legislative Workshop acknowledged that many IBEW members who currently work on the Quantum Frederick campus do not live in Frederick County.

only a small number of permanent employees will be needed to support operations at each data center.

Second, a sound cost-benefit analysis cannot begin and end solely with job growth and revenue projections. It must consider the energy, environmental, climate, health, and other costs associated with data center development. Any decision to expand the Overlay Zone beyond the existing Quantum Frederick campus footprint should only occur after the completion of a state-wide or County-specific comprehensive *independent* cost benefit analysis that accounts for these impacts and informs any need for the establishment of further guardrails.

Uncertainty about the Impacts of Additional Electricity Load and Water Needs to Serve the Existing Catellus Campus

More than 500 acres within the existing Catellus campus remains available for data center development. The impacts of the additional load on grid capacity and ratepayers, as well as the availability of water for cooling purposes have not been adequately assessed. Accordingly, without a better understanding of how electricity supply and water capacity will affect development of the existing campus, expanding the Overlay Zone beyond the boundaries of the Catellus campus is premature.

Cumulative Emissions from Operation of Backup Diesel Generators

One important and unquantified impact on air quality are the aggregated criteria pollutant emissions from multiple diesel generators operating simultaneously across a fully built-out Quantum Frederick campus during maintenance and testing operations, or in the event of a grid outage or failure. Current State regulations do not authorize the Maryland Department of the Environment to consider the cumulative emissions impact as part of the permitting process for diesel generators not under common control or ownership. State legislation that would require a cumulative impact analysis as part of the air quality permitting process will be introduced in the upcoming Maryland General Assembly session to address this major flaw in the permitting process. Passage of the legislation would provide an important safeguard for adjacent communities. Expansion of the Overlay Zone should be deferred until the permitting process for backup diesel generators is revised to factor in cumulative emissions impacts.

Impact on Agricultural Preservation and Green Infrastructure Goals

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

agricultural preservation programs and goals. Moreover, the proposed footprint of the Overlay Zone and expanded Eastalco Community Growth Area would abut two residential communities and extend data center development very close to the southern boundary of the Ballenger Creek Community Growth Area, effectively eliminating much of the green buffer that currently separates these two large growth areas.

Impact on County's Ability to Meet Climate Goals and Renewable Energy Targets

Across the Country, rapid growth of the data center industry is straining the grid and is projected to result in increased reliance on new fossil fuel generation. The recently published joint City/County Climate and Energy Action Plan acknowledges that data centers are projected to be the County's single largest contributor to future greenhouse gas emissions. A decision to expand the Overlay Zone beyond the existing Quantum Frederick campus should not be made without understanding the impacts on the County's ability to meet its climate goals and renewable energy targets.

For all the above reasons, we urge you to adopt a cautious and sound approach to expansion of the data center sector in Frederick County.

Thank you for the opportunity to comment on this important matter.

KATHY KINSEY
Chair, Government Affairs Committee
Mobilize Frederick

cc: Karen Cannon, Executive Director



Fwd: CDI-OZ - Noffsinger Property

From Tom Natelli <tomnatelli@natelli.com>

Date Mon 12/15/2025 1:47 PM

To County Executive <CountyExecutive@FrederickCountyMD.gov>; Council Members <CouncilMembers@FrederickCountyMD.gov>

Cc Carpenter, Deborah <DCarpenter@FrederickCountyMD.gov>; Superczynski, Denis <DSuperczynski@FrederickCountyMD.gov>; Flom, Karin <KFlom@FrederickCountyMD.gov>; Gaines, Kimberly <KGaines@FrederickCountyMD.gov>

1 attachment (71 KB)

Letter to County Executive & County Council RE - Noffsinger 12-15-2025.pdf;

[EXTERNAL EMAIL]

I'm resending this with the proper group email box for the County Council this time! My error on the first try.

Warm regards.

Tom

----- Forwarded message -----

From: **Tom Natelli** <tomnatelli@natelli.com>

Date: Mon, Dec 15, 2025 at 1:39 PM

Subject: CDI-OZ - Noffsinger Property

To: <countyexecutive@frederickcountymd.gov>, <countycouncil@frederickcountymd.gov>

Cc: Carpenter, Deborah <DCarpenter@frederickcountymd.gov>, Superczynski, Denis <DSuperczynski@frederickcountymd.gov>, Flom, Karin <KFlom@frederickcountymd.gov>, Gaines, Kimberly <KGaines@frederickcountymd.gov>

Please see the attached correspondence submitted for the record for the Noffsinger Property.

Warm regards,

Tom

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This email contains information that may be confidential. If you receive this email in error and are not the intended recipient, please delete and notify the sender at Natelli Communities.

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This email contains information that may be confidential. If you receive this email in error and are not the intended recipient, please delete and notify the sender at Natelli Communities.

**Manor Woods Road Properties, LLC
3501 Urbana Pike
Frederick, Maryland 21704**

December 15, 2025

Sent via email

County Executive Jessica Fitzwater
Frederick County Council Members
Winchester Hall
12 E Church Street
Frederick, MD 20701

Re: Noffsinger Property within the CDI Overlay Zone

Dear County Executive Fitzwater and Council Members:

The Noffsinger Property comprises a total of 103.58 acres across seven parcels of land. **Approximately 95.60 acres are already zoned General Industrial.** Approximately 7.98 acres (designated PC1 on the Planning Commission recommendation maps) is currently zoned AG. In addition, approximately 63 of the 103 acres already carries an S5/W5 water and sewer category designation.

The Planning Commission has recommended that all of the Noffsinger Property be included in the CDI-Overlay Zone and within the Growth area boundary. The Planning Commission has also recommended that the 7.98 acres (PC1) currently zoned AG be Comp Plan designated for GI zoning. The Planning Commission has further recommended that a small portion of the property (PC2) be advanced to S5/W5 as a clean-up matter, so the designation aligns with the balance of that larger parcel. We appreciate the Planning Commission's recommendations.

As the Council makes its final decisions concerning the Critical Digital Infrastructure Overlay Zone, we are writing to request that the Council build upon the recommendations made by the Planning Commission and take the steps necessary to unify the zoning and water and sewer category designations across all 7 parcels now, in order to avoid lengthy administrative processes necessary to clean up the zoning and unify the water and sewer category designations in the future.

We would appreciate it if the Council would apply GI zoning now to the 7.98 acres currently zoned AG; and advance the Water and Sewer Category to S5/W5 now for the parcels not yet advanced to this designation so that the entire 103.58 acres has unified zoning and water and sewer designations.

I'd note here that none of the 103.58 acres is currently within a priority preservation or rural legacy area. Part of the property already has an approved Letter of Understanding, permitting up to 1,600,000 square feet of CDI facilities, and the parcel was granted a water and sewer category change in 2023, advancing it to S5/W5 for the purposes of planning utility extensions to the site. The property also has an approved Detailed Load Study issued by First Energy to supply power to the site. Applying GI zoning now to the 7.98 acres (PC1) will allow for a more thoughtful and comprehensive approach to the final planning for the overall property. We will not be seeking additional density associated with the addition of the 7.98 acres to a development plan for the site. It will simply permit a more thoughtful execution of a development plan for the overall property.

Please let me know if you would like to discuss this request in any more detail, and we appreciate your consideration.

Sincerely,



Tom Natelli
Manor Woods Road Properties, LLC

cc: Debbie Carpenter
Kim Gaines
Denis Superczynski
Karin Flom



Public hearing: Data Center Overlay

From Lauren Bello <sportobello95@hotmail.com>

Date Fri 12/12/2025 5:13 PM

To Council Members <CouncilMembers@FrederickCountyMD.gov>

[EXTERNAL EMAIL] Good evening, I am writing to express my concerns and outrage regarding the proposed data center expansion in Adamstown. There are real and direct concerns to the neighbors, schools and local residences that are not being adequately addressed. Where is the due diligence to ensure that folks who live, work and learn in the adjacent and surrounding areas will be safe and unaffected? Where are the guarantees regarding water, air and soil safety? How are the staff and students of Carroll Manor ES being protected? How will the general public be able to monitor the air and water quality changes? How will our electric bills be affected? It is irresponsible to move forward until these questions can be adequately answered and safety guarantees put into place. Thank you for your attention. Lauren Bello Sent from my iPhone



Quantum Frederick concerns

From Dedra Salitrik <dedrasalitrik@gmail.com>

Date Fri 12/12/2025 4:32 PM

To Council Members <CouncilMembers@FrederickCountyMD.gov>

[EXTERNAL EMAIL]

Frederick County Council members:

I'm a Frederick County resident with huge concerns about the impact of the 92 backup diesel generators planned as backup power sources for the Quantum plant. My concern is due to the water and air pollution that will be caused by them. Our climate in Frederick and the health of the people and wild residents who live here will be severely and dangerously impacted by the pollution these generators will cause.

I'm writing to ask that you vote NOT to allow these generators to be added to the already fragile environment we live in. An alternative, more climate friendly method of producing power, needs to be identified. The Quantum Frederick data center will emit more than enough noise and other negative impacts including pollution without adding the diesel generators.

Sincerely,
Dedra Salitrik



Request for Review of Attached Letter – CDI Overlay Zone Consideration

From Paul Serio <arnolddeveloper@gmail.com>

Date Fri 12/12/2025 3:43 PM

To Council Members <CouncilMembers@FrederickCountyMD.gov>; Donald, Jerry <JDonald@FrederickCountyMD.gov>; Luna, Nancy <NLuna@FrederickCountyMD.gov>; McKay, Steve <SMcKay@FrederickCountyMD.gov>; Redmond, Lee <LRedmond@FrederickCountyMD.gov>; Keegan-Ayer, MC <MCKeegan-Ayer@FrederickCountyMD.gov>; Duckett, Kavonte <KDuckett@FrederickCountyMD.gov>; Carter, Mason <MCarter@FrederickCountyMD.gov>; Young, Brad <BYoung@FrederickCountyMD.gov>; Grabowski, Sarah <SGrabowski@FrederickCountyMD.gov>; Knapp, Renee <RKnapp@FrederickCountyMD.gov>

1 attachment (2 MB)

Arnold - 4315 Ballenger Creek Pike - CDI Overlay request.pdf;

[EXTERNAL EMAIL]

Dear Frederick County Council Members,

Please find attached a letter respectfully requesting the inclusion of the property located at 4315 Ballenger Creek Pike, Frederick, MD (SDAT Account #01-002341, 104.2 acres) in the proposed Critical Digital Infrastructure (CDI) Overlay Zone.

I kindly ask that you review this letter for consideration during the upcoming Frederick County Council hearing scheduled for December 16, 2025.

Thank you for your time and thoughtful consideration of this matter. Please feel free to contact me if you need any additional information or documentation.

Best regards,

--
Paul Serio

Arnold Developer Associates, Inc.
410-340-5660
arnolddeveloper@gmail.com

December 12, 2025

Frederick County Council
12 East Church Street
Frederick, MD 21701

Subject: Request for Inclusion in Proposed Critical Digital Infrastructure (CDI) Overlay Zone

Dear Members of the Frederick County Council,

I am writing to respectfully restate my request for the inclusion of the following property in the proposed Critical Digital Infrastructure (CDI) Overlay Zone, and to emphasize that this request should be considered at the upcoming Frederick County Council Legislative Meeting scheduled for December 16, 2025:

- **Property Address: 4315 Ballenger Creek Pike, Frederick, MD**
- **SDAT Account Number: 01-002341**

The inclusion of this property in the CDI Overlay Zone is essential at this time to allow the community, property owners, and potential developers to adequately plan for the future of Frederick County.

I have attended workshops hosted by both the Frederick County Planning Commission and the Frederick County Council to better understand the concerns and significance of the proposed overlay zone. As shown on the attached map, the subject property, labeled as “Arnold” is adjacent to the former Eastalco property along the southern boundary. The eastern boundary abuts both the Eastalco property and the NDR Properties parcel—both of which are currently under consideration. The entire western boundary runs along Ballenger Creek Pike, while the northern boundary is wooded, separating seven adjacent residential parcels.

Inclusion in the overlay zone represents a practical initial step to allow potential future uses of this property to be contemplated. This inclusion does not change the underlying zoning or eliminate the need to address future setback requirements, buffers, and other considerations before any significant changes occur. Rather, it enables smart planning for the future of this property, surrounding area, and Frederick County.

Additionally, I urge the Council to recognize the significant economic benefits that Frederick County can realize by capitalizing on the data center industry and its continued expansion. This sector represents a critical opportunity for job creation, tax revenue, and

long-term economic growth. The inclusion of the subject property should be considered as proactive planning will ensure Frederick County remains competitive and well-positioned to attract investment in this rapidly growing industry.

The proposed overlay zone is a forward-thinking approach to forecasting infrastructure needs and ensuring Frederick County is prepared to seize opportunities in an industry that shows no signs of diminishing.

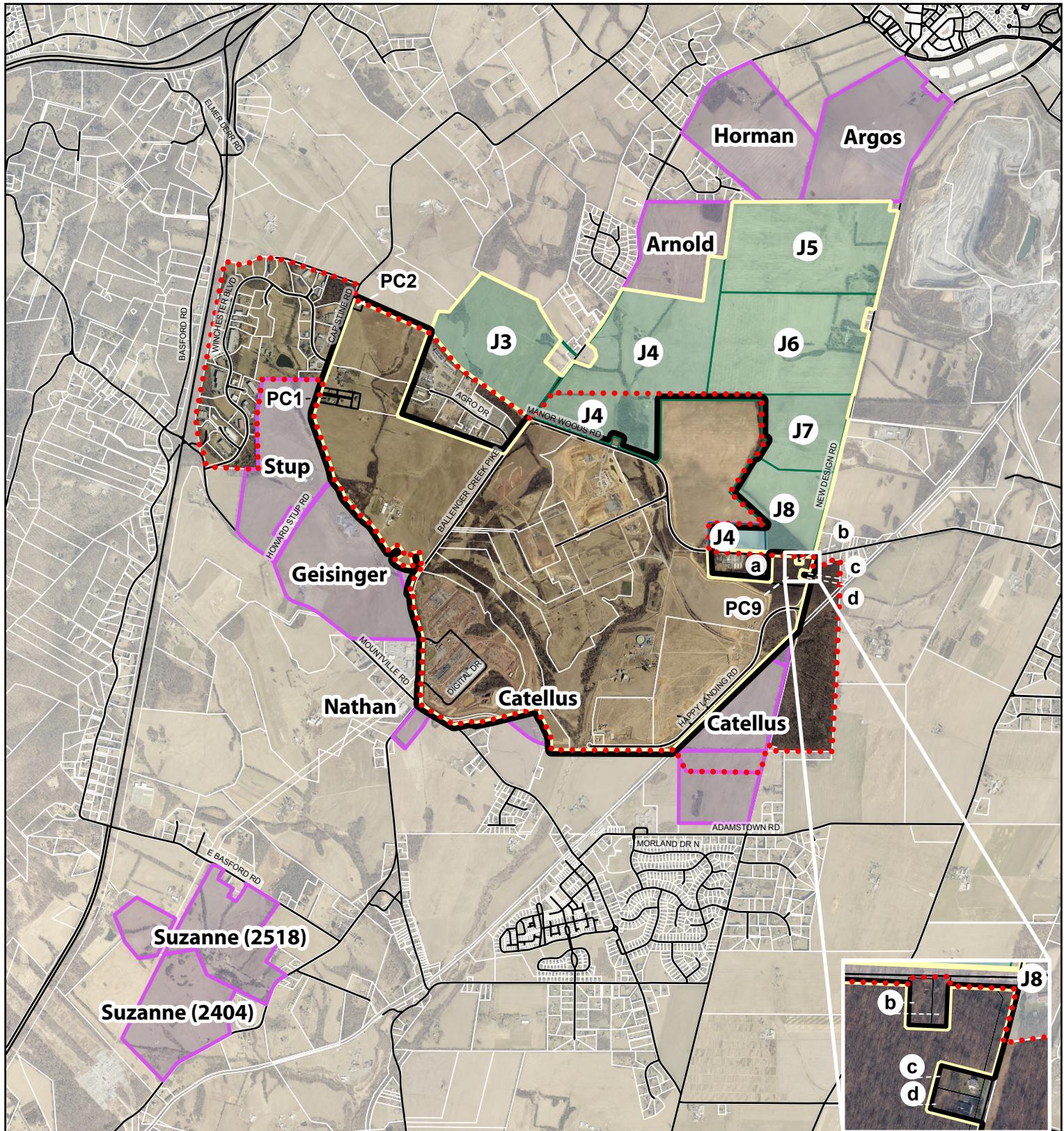
Thank you for your consideration of this request and for your commitment to planning responsibly for the future of Frederick County. Please feel free to contact me if you require additional information or documentation.

Sincerely,



Paul Serio

Arnold Developer Associates, Inc.
410-340-5660



Map A- Potential Critical Data Infrastructure (CDI) Overlay Zone Council Consideration

Legend:

- Frederick County Planning Commission(FCPC) July Draft Areas
- Property Owner Request Areas for Inclusion in the Overlay Zone
- FCPC Recommended Community Growth Area

FCPC CDI Acres	FCPC CDI % of County
1,585.8	0.37

Projection: NAD 1983 State Plane Maryland FIPS 1900 Feet
 While efforts have been made to ensure the accuracy of this map, Frederick County accepts no liability or responsibility for errors, omissions, or positional inaccuracies in the content of this map. Reliance on this map is at the risk of the user. This map is for illustration purposes only and should not be used for surveying, engineering, or site-specific analysis. Printed 11/17/2025

0 0.25 0.5 1 Miles

MAPID:540

The Case Against the Suzanne Trust's Request to Rezone

The Trust's Request: 2404 and 2518 Ballenger Creek Pike from agricultural to industrial zoning and to be included in the data center overlay

These two properties have never been planned for anything other than agriculture.

They are within the Carrollton Manor Rural Legacy Area, a Frederick County Priority Preservation Area, and an area designated by both Scenic America and Scenic Maryland as "worthy of preservation." They are not in or near the proposed data center overlay.

Broad Public Policy Favors Rural Character- There has been no change of character in the area that includes the applicant's two parcels. The applicant's "change of character" argument concerning a recently installed fiber line as justification for rezoning is spurious.

Both addresses lie amidst 22 federal, state, and locally designated areas intended to preserve southern Frederick County as rural, scenic and not intended for industry. The two parcels are within some of these designations and near all of the others. These 22 official designations underscore that governments at all three levels view the character of southern Frederick County as special and deserving to remain rural and protected as a matter of public policy intent. See the list below.

The State of Maryland local Priority Preservation Area in southern Frederick County is designated by statute as preferably to remain rural and zoned for agriculture, woodlands, parkland, and other pastoral uses. The 19,337-acre Area contains a large concentration of preserved farmland on some of the most fertile and productive agricultural soils in the county. The local Priority Preservation Area has nearly 4,000 acres of officially preserved land, over 20 percent of its total.

Frederick County Council Vow-

Voters elect Members of the County Council to protect the interests of their constituents, their welfare and their properties, and to *not harm constituents*. Approval of either of the Suzanne Trust requests would manifestly harm constituents.

Suzanne Trust Property Unrelated to Overlay- The two subject properties lie more than two miles distant from the closest property proposed to be rezoned in the overlay and more than a mile from Eastalco. In both cases, *everything* in between is farmland. There is no justification for the County to rezone the parcels for industrial use by skipping over miles of farmland to add these two distant parcels to the overlay as applicants have requested.

Long Established Official History Against Rezoning the Subject Property-

All six of six official decisions by the County over the last 23 years were to deny requests to rezone either 2404 or 2518 Ballenger Creek Pike from agricultural to industrial or anything else.

- In **2002**, when Dynegy Inc. requested rezoning the 2404 Ballenger Creek Pike farm (at that time "the Beachley Farm"), now owned by the Suzanne Trust, from agricultural to heavy industry, the County refused.
- In **2002**, when Duke Energy requested rezoning three farms adjacent to 2404 Ballenger Creek Pike from agricultural to heavy industry, the County refused.
- In **2016** when the then owner of 2518 Ballenger Creek Pike (at that time "the Ginsburg farm") asked to have that parcel rezoned from agricultural to heavy industry to convert the entire farm into a solar array, the County refused.
- In **2020**, when Duke Energy again investigated prospects of building a power plant near the subject properties, Duke withdrew when it became clear that the previous County Executive and County Council would be opposed.
- In **2021**, when the then owner of 2518 Ballenger Creek Pike (at that time "the Ginsburg farm") asked to have the parcel rezoned to permit construction of a housing cluster, the County refused because the parcel could not pass required percolation tests.

- In **2025**, the County Planning Commission refused the Trust's request to include the parcels in the overlay. Consideration by the Board of County Commissioners should pay particular attention to this correct recommendation of the Planning Commission.

Long Recognized Environment Threat-

The Suzanne Trust stated its intention to construct what it describes as a "lithium battery storage facility" which is completely at odds with protecting clean water, creeks and wells.

If the county rezoned the Suzanne land and a toxic and dangerous industrial plant were built, prime soil would become a brownfield. Brownfields, like cancers, turn greenfield land into blighted brownfields. Brownfields can never be farmland again. It is well researched that industrial blight such as this attracts further blight because "the blight is there already."

Freedom Creek and Northstar Creek both flow through the Suzanne property, joining at a cattle farm at 2455 Ballenger Creek Pike where they become Tuscarora Creek which enters the Potomac River three miles downstream. The rising point of the year-round North Star Creek is a spring on the Suzanne property. The farm immediately upstream at 2454 Ballenger Creek Pike raises sheep which are watered by Freedom Creek which also flows through a grain farm at 4501 East Basford Road. All three farms, which directly abut the Suzanne property, rely on the two creeks as their sole water source for their animals and crops. All homes abutting Suzanne, including the sheep farm at 4830 East Basford Road and a higher number of homes nearby, rely on their wells that could be fed by the two creeks.

The Suzanne property also includes the Thomas Family Cemetery.

Personal Economic Damages- If the Trust's rezoning request were approved, the estimate of lost property values just for the 20 homes directly adjacent to the Trust property is from \$1,256,400 to \$1,868,400, an average of \$78,120 per family, with the estimate for farms higher. This estimate was performed by a court-certified expert witness in economic damages. A loss of this magnitude would be the largest financial hit that most families would ever experience. It is this great harm that those who elected you look to the Board of County Commissioners to protect us from.

As an example, a property directly adjacent to the Suzanne Trust property would suffer a six-figure drop in value if the Trust property were industrialized. This property, settled in 1768, is on the Maryland Registry of Historic Properties and is a Frederick County Landmark. It is covered by a permanent conservation easement donated to the Maryland Environmental Trust. Its owners have long been active in the civic benefit to the Frederick County community and don't want to have to give up their home because of intrusive heavy industry 25 feet away. All of their neighbors fear the same.

=====

Federal, State, and locally designated areas assigned to preserve most of southern Frederick County as rural, scenic and, for the most part, not intended for development.

County

- County of Frederick Rural Legacy Program
- Carrollton Manor Land Trust (includes Suzanne property)
- County of Frederick agricultural zoning (includes Suzanne property)
- Sugarloaf Mountain Natural Area Park
- Monocacy Natural Resources Area Park
- Future County park at 2131 Ballenger Creek Pike (0.6 to from Suzanne property)

State

- Maryland Rural Legacy Program
- Agricultural Land Preservation Foundation Farmland Preservation Partnership Program
- Mid-Maryland Frederick Rural Legacy Area (Carrollton Manor, includes Suzanne property)
- Carrollton Manor Rural Legacy Area (38,265 acres, 60 square miles, includes Suzanne property)

- Washington Run Rural Area Historic District (0.5 mile to Suzanne property)
- Maryland Environmental Trust Preservation Easement Program (25 feet to Suzanne property)

Federal

- United States Department of Transportation US Route 15 Historic Corridor
- United States Department of Transportation Catoctin Mountain Scenic Byway
- Journey Through Hallowed Ground National Scenic Byway
- Journey Through Hallowed Ground National Heritage Area
- United States Park Service Civil War Heritage Area
- United States Park Service Chesapeake & Ohio Canal National Historic Park
- United States Park Service Chesapeake & Ohio Canal National Byway
- United States Park Service Monocacy National Battlefield

Conservation Organizations

- Scenic America recognition of surrounding area (includes Suzanne property)
- Scenic Maryland recognition of surrounding area (includes Suzanne property)