

**From:** Anne Garnett <agarnett02@gmail.com>

**Sent:** Thursday, December 18, 2025 9:33 AM

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

**Cc:** Tom Garnett <shortchenpa@gmail.com>; Brooke Henley <bhinwdc@gmail.com>; Irene Garnett-Dooling <irenegarnett@gmail.com>; Bob Dooling <bert37@gmail.com>

**Subject:** Please read. Please stop the expansion or Data Centers (SB116)

**[EXTERNAL EMAIL]**

Please At least wait until you see all the positives and negatives For what you have already set in motion.

Dear County Council Members,

I am writing today regarding the urgent need to halt all action on expanding the CDI Overlay Zone until the findings of the newly revived **State-mandated data center impact study (SB 116)** are made public.

The Maryland General Assembly has acted decisively: on **[Today's Date: December 16, 2025]**, the State Senate successfully overrode Governor Wes Moore's veto of **SB 116**, the bill funding a critical, comprehensive study into the environmental, energy, and economic impacts of data center development across the state.

## **1. The New Mandate: Frederick County Cannot "Fly Blind"**

- **Bipartisan Consensus:** The successful override demonstrates a **strong, bipartisan consensus** in Annapolis that Maryland is currently "flying blind" on data center policy. The legislature agrees with the citizens: we must quantify the true cost of the AI boom before committing land and resources.
- **The Purpose of the Study:** SB 116 will compel the Department of the Environment, the Maryland Energy Administration, and the University of Maryland to produce the **exact, objective data** Frederick County needs to answer its most critical questions:
  - What will be the impact on **utility rates** for residents?
  - Is our **power grid and water supply** adequate for this scale of expansion?
  - What are the **true costs** to our environment and public health (e.g., diesel generator pollution)?
- **The Political Message:** The State of Maryland is taking the time to conduct due diligence. For the Frederick County Council to move forward now

and unilaterally expand the CDI Overlay Zone to an additional **2,200 acres** before this essential information is available is to **act in bad faith** against the spirit and intent of the entire General Assembly.

## 2. Procedural Recklessness vs. Prudent Planning

You are currently proposing expansion without having the data for the first  $\text{\$1,600 acres}$  already approved. Why accelerate this risky expansion when the State is about to provide you with the necessary roadmap?

- **The Goal is Responsible Zoning:** The study will define the **appropriate guardrails** and identify **appropriate sites**—areas that can withstand the energy and water demands without harming existing communities. Without this data, approving the expansion is the equivalent of permanently sacrificing prime land based on outdated, incomplete, and industry-funded speculation.
- **Political Consequences:** The state legislature has rejected the approach of moving forward without data. For the County Council to reject the same principle signals a deliberate disregard for prudent governance and puts you directly at odds with the will of the state—and your local constituents.

We demand that the Frederick County Council **immediately postpone all votes and decisions** related to the expansion of the CDI Overlay until the comprehensive SB 116 study is completed and its findings can inform truly responsible, site-specific zoning decisions.

Anne Garnett  
BC resident  
3264 Geranium Court  
Adamstown, MD 21710  
C-240-285-6517  
Metok Jin Ma  
Sent from my iPad

**From:** Sean Kolhoff <kolho1sj@gmail.com>  
**Sent:** Wednesday, December 17, 2025 8:56 PM  
**To:** County Executive <CountyExecutive@FrederickCountyMD.gov>; Council Members <CouncilMembers@FrederickCountyMD.gov>  
**Subject:** Data Centers in Frederick County

**[EXTERNAL EMAIL]**

Dear council members,

While I have not lived in Frederick County long, I have come to appreciate this community's connection to the natural resources available for all residents to enjoy year round. From the trails through the Catoctin Mountains to the scenic Monocacy River, there are plenty of ways to experience nature in our county.

The recent proposal to expand the presence of data centers in the county is very unfortunate and stands against the county executive's previous commitment to sustainable business development. Increasing the number of data centers in Frederick would have many downstream environmental and financial impacts on county residents.

Allowing these centers to expand unchecked will lead to increased electric costs for our community and the degradation of our treasured environmental resources. I believe this situation is dire. As members of the council, I am asking you to act in the interests of the people of Frederick County and keep our natural resources available for generations to come.

Sincerely,

Sean Kolhoff, PhD  
Frederick County, MD, Resident

**From:** Angela Cook <dogmom65412@gmail.com>  
**Sent:** Thursday, December 18, 2025 8:23 AM  
**To:** Council Members <CouncilMembers@FrederickCountyMD.gov>  
**Subject:** Overlay

**[EXTERNAL EMAIL]**

Good Morning,

I was unable to attend last night's meeting. However, I believe my neighbors covered all of my concerns.

On Tuesday even I slipped on black ice on the sidewalk beside the parking garage. Hopefully, more care will be given to that area with salt in future bad weather. Merry Christmas and Happy 2026!

Angela Cook  
4501 East Basford Road

**From:** DIANE & BRUD BICKNELL <bicknell0104@comcast.net>

**Sent:** Thursday, December 18, 2025 6:59 AM

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

**Subject:** Final Plea - Agree to the Planning Commission Recommendation and Wait for the Data Center Study

Dear Frederick Leaders,

Two days of testimony about the CDI Overlay has left me baffled. **Even the Council doesn't agree on what exactly we're getting with the data centers already approved.** Maryland has given you a sensible PAUSE button. Wait for a data center study to be completed before you approve any more data center growth, and certainly before you designate a huge area of farmland, next to long-established neighborhoods as a place for future data center complexes.

If you've read my previous emails you know where I stand. **Data Centers are NOT good neighbors.** Their massively intrusive concrete buildings overshadow homes, reduce property values, and fill the neighborhood with pollution, lights, noise, and possibly many unseen dangers that a study could reveal. You cannot dispute that they hurt the unlucky Frederick residents who live near them in communities that were approved over 50 years ago.

Please keep the approved build zone within the boundaries proposed by the Planning Commission and wait for the results of the Maryland study.

Diane Bicknell  
Char Leigh Circle  
Frederick

On 12/02/2025 12:39 PM EST DIANE & BRUD BICKNELL <[bicknell0104@comcast.net](mailto:bicknell0104@comcast.net)> wrote:

Dear Council Members, County Executive Staff, and Planning Commissioners,

As the County Council heads to the finish line with a decision about the best boundaries for data center growth in Frederick County, **I'm writing once again to speak out against the CDI overlay that includes land next to neighborhoods.** I have sent you articles about how data center growth is negatively changing small communities in Virginia, a video taken next to a data center compound in Ashburn that reveals the constant noise made by their huge air conditioning units even on a 65 degree day (email 11/4/2025), and pleas from my 6 year old granddaughter to continue to protect farmland that is home to a large variety of wildlife. I hope that one or all of my submissions has caused you to look away from the temporary monetary windfall and see how permanently damaging such a huge data center complex would be.

**Please follow the Planning Commission's proposal for a much reduced data center growth area.** This topic can always be revisited in the future once we know the exact impact that the data centers will have on our communities and resources. Please protect our beautiful farmland as well as the right to the "Frederick quality of life" for ALL of the citizens of Frederick County, and not just those who wouldn't need to worry about data centers invading their neighborhoods.

Diane Bicknell  
Char Leigh Circle  
Frederick

**From:** Tess Rollins <tessrollins@yahoo.com>  
**Sent:** Wednesday, December 17, 2025 6:23 PM  
**To:** Council Members <CouncilMembers@FrederickCountyMD.gov>  
**Subject:** Expansion of data center overlay in Adamstown

**[EXTERNAL EMAIL]**

Dear Frederick County Council Members,

I want to thank you for graciously extending time for input on this topic so all who wished to speak will have that opportunity this evening. I spoke briefly late last night and I appreciate your attention. I was clear in opposing extension of the overlay at this time.

Like so many others, I believe it is most sensible to allow time for the existing data center projects to be completed and to become fully operational, and then wait at least one year to see how that goes. Order in-depth studies on all aspects and wait until results can be studied by all appropriate agencies and organizations of concern. And only then consider approval of any additional data centers in the County.

I have some additional thoughts I was not able to share in person. You all recognize, I hope, that our County is special and so is the State. Maryland is a small state with an enormous responsibility. We are keepers of the Chesapeake Bay.

The entire state has impacts on the Bay. All of the streams and creeks that supply our forests and fields flow into the rivers that enter the Bay. Our Potomac River conditions have been brought back from a terrible low, but still need improvement. Water conditions of our rivers are impacted by the health of our lands; the vegetation, soils, drainage, runoff, and contamination. Let's wait and see how the data centers in Adamstown affect our impacts on the Bay before adding more land to be used in this way.

Maryland also has some of the best soil for farming right here in Central Maryland and on the Eastern Shore. Soils on the Eastern Shore are being degraded by saltwater influx. Our soils are secure except for development taking them out of agricultural use. The MPRP power lines that will serve Virginia data centers are set to destroy valuable farm and agrotourism properties if allowed to proceed. Let's pause and consider our role in the State before destroying more farmland and greenspaces.

Maryland has such a diversity of landscapes and beauty. Our precious Frederick County has it all. Mountains, lakes, riverfronts, forests, pastures, and the wonderful crop fields that delight us with different colors throughout the seasons. We have space. Space to breathe. Space for our eyes to see way beyond our offices and homes. That is also space for our minds to rest, think, contemplate, invent, create. Let's pause before trading precious, precious space for technology and money.

So very many concerns have been laid before you by the people of the County, many of them lifelong residents. Yes, times change. But values don't have to. Standards don't have to. I think we must find a way to maintain our core truth. That the people of Frederick County, the ones who are here for the long haul, are proud of its heritage, its beauty, it's agriculture, and its down-home hospitality. Let's, please, not lose that.

Thank you all for your efforts on behalf of those who count on you.

Respectfully,

Celeste Rollins

[Tessrollins@yahoo.com](mailto:Tessrollins@yahoo.com)

240-815-0844

[Yahoo Mail: Search, Organize, Conquer](#)

**From:** Elizabeth Bauer <ebenvision@gmail.com>

**Sent:** Wednesday, December 17, 2025 6:47 PM

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

**Subject:** Comments on Overlay

**[EXTERNAL EMAIL]**

All,

Please see my attached comments regarding the CDI Overlay. I was unable to comment on all my points last evening and am submitting the remainder for your consideration.

Thank you again for taking the time to hear the thoughts from the community.

Regards,

Elizabeth Bauer

**From:** Marcie Zampini <marciezampini@gmail.com>  
**Sent:** Friday, December 19, 2025 7:53 AM  
**To:** Council Members <CouncilMembers@FrederickCountyMD.gov>; County Executive <CountyExecutive@FrederickCountyMD.gov>; Planning Commission <PlanningCommission@FrederickCountyMD.gov>  
**Subject:** Re: Data Center Comments

[EXTERNAL EMAIL]

<https://youtu.be/f40SFNcTOXo?si=bgS7Qmn2XG3VymAa>

If highly recommend watching this so you can be sure to make the smart decision.

Respectfully,  
Marcie Zampini  
[marciezampini@gmail.com](mailto:marciezampini@gmail.com)

On Tue, Dec 16, 2025, 3:35 PM Marcie Zampini <[marciezampini@gmail.com](mailto:marciezampini@gmail.com)> wrote:  
You are misguided if you think data centers will help Frederick County. The economic impacts are only at the outset, when the datacenters are being built. Once they are built, the economic impacts decrease as shown in the study linked.

If you build data centers, you will likely cause water and energy costs to increase beyond what the county can support. I cannot believe you all get paid to consider this, and yet none of you have reviewed the economic impacts and what happened to NOVA. You should be removed from your roles if even I, a simple constituent, is able to understand this in about 15 minutes.

I will be sure to spread this study around the Frederick community so the people know what you're trying to accomplish and how it will make their lives more expensive based on what happened to NOVA. People are LEAVING NOVA because of this? How do I know? I live up here but work in NOVA and I hear the homeowners down there discussing this.

You're going to steal the water from Frederick citizens, and the data center won't produce jobs for them. This is asinine to me.

<https://jlarc.virginia.gov/landing-2024-data-centers-in-virginia.asp>

## Economic Impacts

- **Benefits are mainly from construction:** Data centers provide substantial positive economic benefits, primarily through the massive **capital investment** during their initial construction phase.

- **High-paying jobs, fewer employees:** Data center jobs are generally high-paying, but the facilities employ relatively few full-time operational staff compared to other industries. Construction, however, supports a much larger number of workers (around 1,500 at the height of building a typical center).
- **Overall contribution:** The industry is estimated to contribute 74,000 jobs, \$5.5 billion in labor income, and \$9.1 billion in GDP to Virginia's economy annually, concentrated mostly in Northern Virginia.
- **Local Tax Revenue:** Data centers can generate substantial local tax revenue, mainly from business personal property and real property taxes. In mature data center markets, this revenue can account for up to 31% of a locality's total revenue.
- **Sales Tax Exemption:** Virginia's retail sales and use tax exemption for data center equipment (servers, cooling, etc.) is a critical incentive for attracting the industry, providing \$928 million in tax savings in FY23.

## Energy & Infrastructure Challenges

- **Immense Energy Demand:** Data centers consume vast amounts of energy. The industry is the main driver of a forecast that predicts **unconstrained power demand in Virginia could double within the next 10 years.**
- **Infrastructure Difficulty:** Building enough new power generation and transmission infrastructure to meet this unconstrained demand will be "very difficult." Even meeting half of the projected demand will be challenging and requires substantial new solar, wind, and battery storage/natural gas plants.
- **Cost Impacts on Customers:** While data centers currently pay their full cost of service, their growing demand will likely increase system costs for all customers, including residential users. A typical Dominion Energy residential customer could see generation- and transmission-related costs increase by an estimated **\$14 to \$37 monthly** by 2040 (in real dollars).

## Local and Environmental Concerns

- **Residential Conflicts:** One-third of data centers are currently located near residential areas. The industrial scale of the facilities, especially when coupled with inadequate local planning, has sometimes led to adverse impacts on residents.
- **Noise Pollution:** The constant, low-frequency noise from data centers can affect the well-being of nearby residents. Localities often lack clear authority or appropriate metrics to regulate this noise effectively through zoning ordinances.
- **Water Use:** Data centers require water for cooling. While Virginia is generally water-rich, some localities have limited water availability, and there is less oversight on how available water should be shared across various uses in those areas.



- **Air Pollution:** Data centers use diesel generators for backup power, which emit pollutants. However, current regulations and minimal use (mostly for maintenance testing) mean they are a relatively small contributor to overall regional air pollution.

The study also recommends legislative actions to:

- Clarify utilities' authority to delay (but not deny) service when capacity is insufficient.
- Expressly authorize local governments to regulate water use and establish **maximum allowable sound levels** for operational data center facilities.
- Require Dominion Energy to plan for the risk of infrastructure costs being stranded with existing customers if demand forecasts do not materialize.

Respectfully,  
Marcie Zampini  
[marciezampini@gmail.com](mailto:marciezampini@gmail.com)

**From:** Hope Green <hope.green76@yahoo.com>

**Sent:** Friday, December 19, 2025 12:55 AM

**To:** Shannon Heafey -MDE- <shannon.heafey@maryland.gov>; County Executive <CountyExecutive@FrederickCountyMD.gov>; Council Members <CouncilMembers@FrederickCountyMD.gov>; Planning Commission <PlanningCommission@FrederickCountyMD.gov>

**Cc:** Brandon Brooks -MDE- <brandon.brooks@maryland.gov>; Zachary Schafer -MDE- <zachary.schafer@maryland.gov>; neiswinter.ian@epa.gov; william.folden@senate.state.md.us; April Delegate Miller <april.miller@house.maryland.gov>; Jesse Delegate Pippy <jesse.pippy@house.maryland.gov>

**Subject:** Diesel Generators

1. Health Impacts Have Tripled (November 2025 Study): A study released on November 21, 2025,

by the University of California, Riverside, found that public health damages from data center pollution

have tripled in four years (2019–2023), specifically identifying diesel backup generators as a

primary source of dangerous particulate matter (PM 2.5) and Nitrogen Oxides (NOx).

2. Virginia Regulators Admit "Worst Case" Scenario (December 15, 2025): A legislative report

found that in a "worst-case scenario," data center generators in Northern Virginia could release

9,000 tons of Nitrogen Oxides annually—roughly equal to half of all annual emissions from

all other sources in the region combined.

3. The Public Service Commission (PSC) noted that granting exemptions would allow a

single site to operate 168 diesel generators (Aligned DC, already approved) simultaneously, creating

emissions equivalent to a 504 MW power plant.

4. The World Health Organization (IARC) classifies Diesel Engine Exhaust as a Group 1 Carcinogen

(Proven to cause cancer in humans).

<https://www.globalpwr.com>

## EPA Compliance for Diesel Generators Simplified



Environmental regulations for diesel generators have grown increasingly complex. Facility leaders want certainty that their power systems are reliable, legally compliant, and engineered for long-term resilience. This guide breaks down how the EPA regulates standby diesel generators, clarifies the meaning of Tier 4 Final vs Tier 4 Certified vs Tier 4 Compliant, explains allowable operating hours for emergency standby use, and introduces **two important concepts often overlooked in emissions discussions: standby rating vs prime rating and why the largest diesel generators are still manufactured to Tier 2 standards.**

## How EPA Tier standards evolved: Tier 1 through Tier 4 Final

EPA emissions standards for nonroad diesel engines have tightened steadily for more than twenty-five years. The progression looks like this:

- **Tier 1:** Introduced in the late 1990s.
- **Tier 2:** Rolled out in 2007 with limits on nitrogen oxides (NOx), particulate matter (PM), and hydrocarbons. Applies to standby generators above 450 kW.
- **Tier 3:** Rolled out in 2007 with limits stricter than Tier 2, but applies only to 37-450 kW standby generators.
- **Tier 4 Interim (Tier 4i):** Added in 2011 for larger engines to begin reducing particulate matter.

- **Tier 4 Final (commonly referred to simply as Tier 4):** The most stringent standard was fully implemented by 2015, requiring major reductions in NOx and PM.

Manufacturers and customers sometimes refer to “Tier 4 Final” and sometimes use “Tier 4.” Today, the term “Tier 4” is generally understood to represent the final and most advanced stage of rulemaking for this Tier.

## The meaning of Tier 4 Certified vs Tier 4 Compliant

These two terms often cause significant confusion, yet the differences affect equipment selection and emissions permitting.

### Tier 4 Certified

- The engine and complete generator package are tested, documented, and certified through the EPA’s official process by the OEM at the OEM’s Factory.
- Units carry EPA certification labels.
- Generally required for applications outside of true emergency standby use, including non-emergency, prime power, and any program involving demand response in parallel operation with the grid. This depends on the local Authority Having Jurisdiction (AHJ), state or region of operations.
- Not permissible to bypass DPF and/or SCR if they were to fail. Engine would not be able to run in the event either item failed.

### Tier 4 Compliant

- **3rd Party Integration of aftermarket treatment products (i.e. SCR and DPF) to achieve EPA Tier 4F equivalent emissions levels.**
- **Onsite testing is often required to verify emissions levels.**
- **Often acceptable in the same applications as Tier 4F Certified.**
- **Can be used to retrofit existing equipment.**
- **It is permissible to bypass diesel particulate matter filter and/or SCR solely if they were to fail. Engine could continue running in the event those items fail.**

COMMENT: THIS IS UNACCEPTABLE. I DO NOT TRUST AMAZON

TO INSPECT FOR FAILURE OF T4 ADD-ONS. AS LONG THE GENERATORS

CONTINUE TO RUN, THEY WON'T BOTHER ABOUT IT. MDE

# WILL NOT BE ABLE TO INSPECT IN A TIMELY MANNER.

## Standby rating vs prime rating: why it matters for emissions

Every diesel generator is rated according to its intended operating profile. The EPA refers to these categories when determining what emissions tier applies.

### Standby Rating

- Intended for use only during utility outages.
- No limit on run hours during an actual outage.
- Strict limits on non-emergency hours, commonly 100 hours per year or less for testing and maintenance, but actual limits depend on local air-district rules.
- Because standby generators are expected to run infrequently, they are allowed to meet less stringent emission standards if classified strictly as emergency standby, typically Tier 2 or Tier 3.

COMMENT: Because the so-called backup generators have been made to be T4 compliant, I feel as

is the CC giving permission to the data centers to run at prime (outside of emergency),

if they don't have sufficient power by the time they intend to go online! Loophole?

### Prime Rating

- Intended to run for extended periods and carry a variable load.
- Used when there is no utility power or in locations where regular, long-duration generator operation is required.
- Prime-rated generators fall under tighter emissions requirements because they accumulate significantly more operating hours.
- Prime power applications typically require Tier 4 Certified emissions unless located in very specific jurisdictions with exceptions.

Understanding your true operating profile is essential. If a facility exceeds allowable non-emergency hours on a standby generator, the engine can be reclassified as non-emergency. That reclassification can trigger Tier 4 requirements even if the generator was originally purchased for emergency use.

COMMENT: HAS THE CC HAS GIVEN THE DATA CENTERS A LOOPHOLE

## THAT THE EPA WOULD NOT APPROVE IF KNOWN?

### EPA Emergency vs Non-Emergency Classification (NSPS)

The US EPA New Source Performance Standards (NSPS) classify stationary engines based on brake horsepower and use type. These classifications determine which emissions standards apply and directly influence whether a generator can operate under Tier 2, Tier 3, or Tier 4 requirements.

#### Stationary vs Portable/Mobile

##### Stationary Engines

- The generator remains in one location for more than 12 months.
- These units must meet EPA stationary engine standards, which include the full tier structure.

**COMMENT: CORRECT ME IF I'M WRONG, BUT THE GENERATORS WILL BE STATIONARY!**

##### Portable or Mobile Engines

- Designed to be moved from site to site.
- Must meet US EPA non-road engine standards, which follow a different compliance pathway than stationary engines.

#### Emergency Classification

Generators classified as emergency engines fall into what most organizations refer to as Standby units.

Characteristics include:

- The generator is not the primary source of power and operates only when the utility supply fails.
- There is unlimited runtime allowed during an actual utility outage.
- Maintenance and readiness testing are limited to 100 hours per year or less, depending on size of genset and/or local requirements.
- Any use outside true outage events must follow strict limits to retain emergency status.

This classification allows the use of Tier 2 or Tier 3 engines in many jurisdictions, provided the engine stays within emergency-only restrictions.

#### Non-Emergency Classification

Generators classified as non-emergency engines are commonly referred to as prime or continuous power systems.

Characteristics include:

- The generator is the primary power source, or
- The generator supplements the utility in applications such as peak shaving, interruptible rate programs, or any use that generates income by exporting power to the grid.

Non-emergency generators accumulate more annual operating hours, so the EPA requires significantly cleaner emissions performance. This is where Tier 4 Certified power systems and Emissions After Treatment Systems (EATS), such as SCR and DPF, become required in most regions.

### How many hours can an emergency standby generator operate legally?

EPA rules allow emergency standby generators to run:

- Unlimited hours during a true utility outage.
- Limited hours for testing and maintenance, typically 100 hours per year or less, depending on jurisdiction and size of genset.

Running beyond those limits or using the generator for peak shaving, demand response, or load management changes the classification. Once that happens, Tier 4 Certified generators are required in most regions.

State and local air districts, especially in major metropolitan areas considered non-attainment zones, often impose even stricter caps. Always confirm local regulations before establishing test schedules or non-emergency use profiles to ensure compliance.

COMMENT: FREDERICK COUNTY IS NONATTAINMENT FOR 8-HOUR

OZONE. ADAMSTOWN HAS NO AIR-QUALITY MONITORING,

SO WE DON'T KNOW IF WE ARE NONATTAINMENT FOR OTHER CONTAMINANTS.

### Why many of the largest diesel generators are only manufactured to EPA Tier 2

This is one of the most misunderstood topics in the power generation industry. Large standby diesel generators in the 500 kW to 4000 kW range, such as the [Cummins DQKAN 2500 kW](#), are typically produced as Tier 2 engines from the factory. Three major factors drive this:

## 1. Engineering and combustion realities at very high horsepower

Engines exceeding approximately 1600 horsepower face significant challenges in meeting Tier 4 Final standards without after treatment. Achieving Tier 4 inside the engine alone would reduce efficiency, raise exhaust temperatures, and increase fuel consumption. Manufacturers design these large engines as Tier 2 to maintain durability, reliability, and stable power output under high loads.

## 2. Intended operational use

Large generators, ranging from 500 kW to 4 MW, are predominantly purchased for emergency standby applications in data centers, hospitals, industrial facilities, and utility infrastructure. Under EPA rules, emergency standby generators can use Tier 2 engines as long as they stay within emergency-only operating limits. Because they are not expected to run continuously, the emissions impact is limited.

## 3. After Treatment allows Tier 4 performance when required

Although the engine itself is Tier 2, the complete generator system can still achieve Tier 4 Final emissions when an Emissions After Treatment System (EATS) is installed. Two common technologies are:

- **Selective Catalytic Reduction (SCR)** for NO<sub>x</sub> reduction.
- **Diesel Particulate Filter (DPF)** for PM reduction.

When engineered correctly, SCR and DPF systems enable a Tier 2 engine to meet Tier 4 Final emissions levels. This approach has several advantages:

- Lower cost compared to building a ground-up Tier 4 engine.
- Proven reliability for high horsepower applications.
- Flexibility to meet differing state and local emissions rules.
- Ability to retrofit after installation if operating needs change.

This is why many large Tier 2 generator models are routinely integrated with after treatment systems for facilities that need prime power, extended operation, or stricter Tier 4 compliance.

## The impact of local regulations: metro vs rural differences

EPA regulations are the national framework, but state and regional air districts often add their own rules. In major metropolitan areas, air quality challenges drive stricter limits on particulate matter and NO<sub>x</sub>. This means:

- Tier 4 Certified units may be required even for emergency use.
- Annual test hours may be capped below federal allowances.
- After treatment may be mandated on larger generators.
- Permit processes can be more extensive.
- Typically the local AHJ requires "Generator Log" book to record testing, outages and scheduled (OM) Operational Maintenance.



COMMENT: I DON'T TRUST AMAZON TO KEEP ACCURATE LOGS AND I NO LONGER TRUST MDE TO INSPECT THAT THEY DO. HOW CAN THEY TIMELY INSPECT THESE LOGS GIVEN THE ESTIMATED AGGREGATE (1,000)? WHAT IF THE DATA CENTER WERE TO FALSIFY THE LOG?

In rural regions or attainment zones, Tier 2 standby-only units may still be acceptable. This is why emissions compliance must always be evaluated at the local level, not just federally.

COMMENT: WE ARE NONATTAINMENT! WE DO NOT HAVE MONITORING

AT THE LOCAL LEVEL. OUR NONATTAINMENT STATUS IS REPORTED AT

THE FEDERAL LEVEL BY EPA!

## Choosing the right generator and emissions package

Your facility should consider:

- True operating profile: standby or prime.
- Location and applicable air district rules.
- Load requirements and peak demand conditions.
- Future expansion and potential use cases.
- Availability of after-treatment systems for Tier 4 Final compliance.
- Long-term cost of ownership, including permitting and fuel profile.

Selecting the correct rating and emissions tier from the beginning avoids costly redesigns, unexpected permitting issues, and operating restrictions later.

## Support from Global Power Supply

Global Power Supply provides [expert engineering](#), turnkey project management, and emissions compliance guidance for backup power systems. Our team helps evaluate your load profile, location, regulatory requirements, and operational goals to recommend the right generator rating and emissions strategy. From Tier 2 emergency systems to complete Tier 4 Final packages with SCR and DPF integration, we deliver solutions that keep your facility compliant and resilient.

Global Power Supply is committed to helping customers navigate complex regulations with clarity and confidence.

**COMMENT:** IT'S CLEAR ALIGNED AND AMAZON DID NOT CONSULT WITH INDUSTRY EXPERTS. SPEED AND SCALE AS CHEAPLY AS POSSIBLE. DIESEL EMISSIONS ARE CARCINOGENIC, PM2.5 AND ULTRA FINE PARTICULATE IN THE EMISSIONS (T4 COMPLIANCE DOES NOT MEAN "ZERO PARTICULATE.") THE

WIND CAN BLOW PARTICULATE MATTER HUNDREDS OF MILES AFFECTING THE HEALTH OF THE ENTIRE COUNTY.

1. Health Impacts Have Tripled (November 2025 Study): A study released on November 21, 2025, by the University of California, Riverside, found that public health damages from data center pollution have tripled in four years (2019–2023), specifically identifying diesel backup generators as a primary source of dangerous particulate matter (PM 2.5) and Nitrogen Oxides (NOx).
2. Virginia Regulators Admit "Worst Case" Scenario (December 15, 2025): A legislative report found that in a "worst-case scenario," data center generators in Northern Virginia could release 9,000 tons of Nitrogen Oxides annually—roughly equal to half of all annual emissions from all other sources in the region combined.
3. Maryland PSC Warning (Aligned Data Centers Case): The Public Service Commission (PSC) noted that granting exemptions would allow a single site to operate 168 diesel generators simultaneously, creating emissions equivalent to a 504 MW power plant.
4. Established Science: The World Health Organization (IARC) classifies Diesel Engine Exhaust as a Group 1 Carcinogen (Proven to cause cancer in humans).

My current residence is 500' from the Amazon facility. My husband is very ill possibly from blowing dust from the construction of the Amazon facility. Now, we have to worry about diesel emissions (a known carcinogen) wafting over our property. MDE should consider other options to Amazon's diesel generator permit. We are not safe in our home; Aligned DC is less than a mile from us. Their 168 generators, already approved plus Amazon's 99 is frightening to us.

Can MDE assure us that their approval of over 200 diesel generators won't be detrimental to our health?

Respectfully,

Hope Green  
Adamstown, Maryland

**From:** Mary Posey <mllposey@gmail.com>

**Sent:** Thursday, December 18, 2025 8:22 PM

**To:** april.miller@house.state.md.us; william.folden@senate.state.md.us; Pippy, Jesse Delegate <jesse.pippy@house.state.md.us>; Council Members <CouncilMembers@FrederickCountyMD.gov>; Fitzwater, Jessica <JFitzwater@FrederickCountyMD.gov>; Tim May <Tim@wfmd.com>; Miller Bob (Frederick) <bob@wfmd.com>; Frank Mitchell - WFMD <frank@wfmd.com>

**Subject:** "For Shame"

[EXTERNAL EMAIL]

Dear All,

Delegate Miller reached out to me yesterday after hearing my comments on wfmd. I told her I would get back to her along with Senator Folden and Delegate Pippy. Haven't had a moment until now. Seems a good idea to broaden the audience.

I expressed deep regret hearing that these leaders signed onto the state bill regarding data centers. I even said "For Shame". I stand by these words and I will share why.

The county staff and elected representatives have done their job. It is time to move forward with some version of the overlay.

Senator Folden also called into wfmd and said he was shocked that Tim agreed further studies would be basically a waste of time and money.

You must understand, we spent 7 years arguing with the local environmentalists about waste to energy. Tim remembers that battle.

You could spend gobs of money studying the data centers and even if everything came back reliable and perfect - it STILL would not be good enough for these people.

They don't want it. "Study it" means "Stop it". "Study it" means "Spend it" - yeah, spend tax dollars to study, study, study.

Frederick County spent money studying waste to energy right out the door. Never did solve our trash problem.

Yes, "For Shame" to stand with the "spokesperson" for Adamstown who circulated a poster of data centers with smokestacks. Watch her public comment so you can see who you signed up to stand with.

Go to about 1:44:30 time mark

[https://frederick.granicus.com/MediaPlayer.php?view\\_id=10&clip\\_id=10399](https://frederick.granicus.com/MediaPlayer.php?view_id=10&clip_id=10399)

I want to thank Council Members Young, Duckett, Knapp, Carter, and Keegan-Ayer for having the spine to stand up and support a wonderful opportunity for Frederick County residents. In fact, I think it will be a crowning accomplishment for this council and administration.

My public comment on Dec 16th ended with the words "Get It Done". It was an honor to stand before the council and say that.

Thank you, County Executive Fitzwater, for your part in helping to "Get it Done"!

Best,  
Mary Posey

**From:** msimpson2005 bennettscreekfarm.com <msimpson2005@bennettscreekfarm.com>  
**Sent:** Friday, December 19, 2025 9:17 AM  
**To:** Council Members <CouncilMembers@FrederickCountyMD.gov>  
**Subject:** Opposed to expansion of Data Centers in Frederick County

[EXTERNAL EMAIL]

Hello,

I am writing to ask that you please do not expand data centers in Frederick county. At least please wait until the Data Center Study in Maryland has been completed to determine real impacts to environments and neighborhoods before making further decisions on placing data centers in our beautiful county.

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

**From:** Linda Coyle <lkcoyle@yahoo.com>  
**Sent:** Wednesday, December 17, 2025 4:58 PM  
**To:** Council Members <CouncilMembers@FrederickCountyMD.gov>  
**Subject:** Data Center overlay

[EXTERNAL EMAIL]

Hello Council Members, I am opposed to extending the data center overlay for all the reasons so many others have already expressed. I am a county resident living in the Libertytown area. 8653 Chestnut Grove Rd.  
Linda Coyle

[Yahoo Mail: Search, Organize, Conquer](#)

**From:** Blanca Poteat <bcpoteat@gmail.com>

**Sent:** Thursday, December 18, 2025 4:33 PM

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

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

**Subject:** Pause CDI Overlay Decision

**[EXTERNAL EMAIL]**

December 18, 2025

To: Frederick County Council

Cc: Frederick County Planning Commission

Frederick County Executive

From: Blanca Poteat, Thurston

Subject: Pause CDI Overlay Zone Decision

Thank you for extending the public record on the CDI Overlay through the end of this week. Although we were unable to attend the public hearing in person (due to untimely injury), we followed the proceedings on FGTV.

State senators and delegates voted in special session on December 16 to override the governor's veto of the Data Center Study Bill, now due by September 2026 (reportedly unanimous in Senate, 111-24 in House);

- Frederick County's State representatives sent a joint letter urging you to pause your decisions on data center development until objective and unbiased study results are available;
- One of your Council colleagues advocated for reliable facts on which to make responsible, community-oriented decisions on these forever land use issues;
- Your constituents have been advocating for several years for reliable cost/benefit analysis of this high impact industry; and
- This week's extended public hearing attracted an overflow crowd with diverse, urgent concerns about the costs – personal, community, environmental, agricultural, historical - of data center development on Frederick County's current and future well-being and sustainability.

These facts and concerns cannot be ignored. They present you with the urgent opportunity to pause your decisions on the CDI Overlay Zone until you have unbiased, factual information on projected costs and benefits of data center development. Industry timelines pushing an early decision should not be allowed to override your commitment to and responsibility for serving the County's best interests.

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

**Sent:** Wednesday, December 17, 2025 4:27 PM

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

**Subject:** PJM control over new data center connections to the transmission system necessary to maintain reliability, OPC tells federal regulators

**[EXTERNAL EMAIL]**

I know you are all closely following the issue of power availability for data centers and the cost impact on retail rate payers (ie all of us). Right?

The below press release from the Office of People's Counsel will help you explain to your constituents, what you must already know, that data center development will cause their electric bills to skyrocket...even more.

Steve Black  
Adamstown

Having trouble viewing this email? [View it as a Web page.](#)

— **OPC** —  
**OFFICE OF PEOPLE'S COUNSEL**  
**State of Maryland**

**FOR IMMEDIATE RELEASE**

December 17, 2025

**Contact:**  
Lori Sears  
[lori.sears@maryland.gov](mailto:lori.sears@maryland.gov)  
410-767-8172

## **PJM control over new data center connections to the transmission system necessary to maintain reliability, OPC tells federal regulators**

**BALTIMORE** – Regional electric system reliability will be compromised and unreasonably high market prices will prevail unless PJM controls the connection of new data centers to the transmission system, [OPC said in comments](#) filed this week with the Federal Energy Regulatory Commission (FERC).

“Adding data centers with city-sized power demands to the regional power system when there is not enough generation capacity to serve them reliably increases costs for existing customers and exposes them to reliability risks,” Maryland People’s Counsel David S. Lapp said. “PJM’s responsibility is to maintain the reliability of the regional system.”

OPC’s comments—filed jointly with State consumer advocates from Pennsylvania, Illinois, Ohio, and Delaware—supported the PJM Independent Market Monitor’s November complaint objecting to PJM “allow[ing] the interconnection of large new data center loads that it cannot serve reliably and that will require load curtailments (blackouts) of the data centers or of other customers.”

The market monitor’s complaint asks FERC to rule that “PJM has the authority to add large new data center loads only when they can be served reliably as defined both by transmission and capacity adequacy.”

OPC’s comments, which support the market monitor’s request, explain that the magnitude of additional load from new data center customers has raised capacity market prices and imposed costs for transmission expansion on all customers in the region. It is highly unlikely that sufficient new generation can be added in the time required to meet PJM’s projected new data center load—about 50,000 megawatts by 2032, about four times Maryland’s entire load built up over a century. Thus, without PJM action, the reliability of electricity supply for all customers will be adversely impacted, OPC said.

[OPC and the other state advocates also responded](#) to a motion by separate coalitions of data centers and generators to dismiss the complaint. OPC asked FERC to fully consider the complaint under the procedural deadline already established for the case.

“It is critical that FERC take action on the complaint to preserve reliability for all customers in PJM and to prevent existing customers from paying for costs caused by data centers,” Lapp said.



*The Maryland Office of People's Counsel is an independent state agency that represents Maryland's residential consumers of electric, natural gas, telecommunications, private water and certain transportation matters before the Public Service Commission, federal regulatory agencies and the courts.*

\* \* \*

[6 St. Paul Street, Suite 2102](#)  
[Baltimore, Maryland 21202](#)

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**Sonia Demiray**  
**Climate Communications Coalition**  
**202-744-2948**  
[ClimateCC.org](http://ClimateCC.org)

**From:** MARK LEWIS [lewisma316@comcast.net](mailto:lewisma316@comcast.net)

**Sent:** Thursday, December 18, 2025 3:28 PM

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

**Cc:** Fitzwater, Jessica <[JFitzwater@FrederickCountyMD.gov](mailto:JFitzwater@FrederickCountyMD.gov)>; Council Members <[CouncilMembers@FrederickCountyMD.gov](mailto:CouncilMembers@FrederickCountyMD.gov)>

**Subject:** Please vote NO on the Adamstown Data Center overlay

**[EXTERNAL EMAIL]**

Dear Council Members, Ms. Fitzwater,

I urge you to vote NO on the Adamstown Data Center overlay.

First, I understand that you have had this issue thrust upon you, and I appreciate that you've had to scramble to come up to speed on all the pros and cons of a data center. It can't have been easy.

I also understand that there will be tax revenue of an amount that would not be easy to turn away from. On this point, there will be tax revenue from the original scope of the data center, so if you vote no on the overlay, you would not be turning away all tax revenue.

I live in Adamstown, MD. My main fear is that my electrical and water rates will rise, as they have in other locations with a data center - combined with a probable property value decline. Voting no on the overlay should limit, to some extent, any utility rate rise. All of the other concerns that residents have - environmental pollution, noise and light pollution, property value declines - they all should factor into your decision, as well.

I've heard an argument that honestly is fairly weak, that if Adamstown has a data center built, other Frederick County locations are safe. Taking this argument at base, it is an acknowledgement that data centers are undesirable. As someone who lives in Adamstown, it is not pleasant to be considered as the county's sacrificial lamb.

Finally, regarding job creation, once construction is completed, the number of jobs offered by data centers is quite low, as documented by numerous reports and articles.

Please vote no on the overlay. You won't receive as much tax revenue, but the many residents in the vicinity of the data center will have a reduction in all of their worries. It's not an elimination, but it is a worthwhile step - one that you all can mention should you decide to campaign again. The last link below is about an Arizona city council that voted no on a proposed data center, earning the applause of their residents - it can be done.

I want to link to (with excerpts from) a few articles on data centers and their impact on communities - perhaps it will aid your decision-making process. Please read, and consider.

### **## Electrical rate increase:**

*Data centers are concentrated in these states. Here's what's happening to electricity prices*

<https://www.cnbc.com/2025/11/14/data-centers-are-concentrated-in-these-states-heres-whats-happening-to-electricity-prices-.html>

"Electricity prices are surging, voters are growing angry, and the artificial intelligence industry's data centers are increasingly a target for blame with U.S. mid-term elections on the horizon.

Residential utility bills rose 6% on average nationwide in August compared with the same period in the previous year, according to the U.S. Energy Information Administration.

The reasons for price increases are often complex and vary by region. *But in at least three states with high concentrations of data centers, electric bills climbed much faster than the national average during that period. Prices, for example, surged by 13% in Virginia, 16% in Illinois and 12% in Ohio."*

### **## Unhappiness of residents living nearby data centers:**

*A humming annoyance or jobs boom? Life next to 199 data centres (Loudoun County)*

<https://www.bbc.com/news/articles/c93dnnxewdvo>

"Today, he deals with the centre's impacts in real time - the one that bothers him the most is the noise pollution. "There are no birds around here anymore," he said, noting the humming or buzzing noise the centre emits scares away a lot of wildlife from his area."

"In addition to the noise concerns, people who live in the area expressed frustration with rising electricity bills. In the past five years, wholesale electricity costs have gone up by as much as 267% in areas near data centres, an investigation by Bloomberg News found."

*Virginia's 'Data Center Alley' residents say an eerie hum is keeping them up at night*

<https://www.pwcva.gov/assets/2024-09/Data-Center%20Boom%20Leads%20to%20Noise%20Disruptions%20in%20Loudoun%20County%2C%20Virginia%20-%20202.pdf>

"In Loudoun County, residents said they could hear the data center even with their windows closed. Some also said it led to anxiety and affected their sleep, mental health, and productivity. Even residents several miles away from the facility complained about the noise."

"Some residents, including Jeff Mach, started organizing and gathering feedback about the noise to bring to Loudoun County's Board of Supervisors and some nonprofits. "It's an artificial noise that just drove people crazy," Mach said. "I'm not exaggerating. It would go through walls. It would reach out far.""

## **## Job growth**

*How Many People Are Needed to Run a Data Centre?*

<https://optrium.co.uk/how-many-people-are-needed-to-run-a-data-centre/>

"A typical 12-megawatt data centre requires approximately 20 to 22 operational staff to run effectively. This team includes essential roles such as Datacentre Critical Environment Technicians and System Administrators."

*How Many Jobs Do Data Centers Create? It Depends*

<https://www.datacenterknowledge.com/operations-and-management/how-many-jobs-do-data-centers-create-it-depends>

"Data centers have frequently been criticized for creating few permanent jobs in relation to their footprint – and this criticism might not be entirely unfounded. In general, data centers generate relatively few jobs compared to the cost of building and operating a typical facility or the amount of land it occupies."

*Arizona city unanimously rejects AI data center after residents' outcry*

<https://www.foxbusiness.com/politics/arizona-city-unanimously-rejects-ai-data-center-after-residents-outcry>

"The Chandler, Arizona, city council voted unanimously Thursday against clearing the way for construction of an [AI data center](#).

Cheers and applause erupted after the unanimous vote outcome was announced."

Sincerely,

Mark Lewis  
5619 Haddington Dr  
Adamstown, MD

**From:** Joseph R Horman <huntrig@msn.com>  
**Sent:** Thursday, December 18, 2025 9:58 AM  
**To:** Council Members <CouncilMembers@FrederickCountyMD.gov>  
**Subject:** Data Center Overlay Input

[EXTERNAL EMAIL]

Good morning council members!

My name is Joe Horman of 4780 Cap Stine Road. I am writing this morning as a follow up to Tuesdays and last evenings public meetings for comment on the data center overlay. Sadly, I was unavailable last evening, and truly didn't know that there was an additional meeting scheduled as I thought it all had ended on Tuesday evening. My apologies.

As with all of the other speakers, I have input I would like to convey, but have been biting my tongue for the most part in this process as to not stir the pot as this subject is as toxic as today's political environment. I refer to this subject as DCDS. Data center derangement syndrome. We don't have the honest facts of the impact these centers will produce on the good or the bad side but most people aren't willing to honestly take the time to gather the facts. They would rather jump on the bandwagon.

Some history of myself: I grew up on Horman Lane, which connects Cap Stine Road with Elmer Derr Road. I graduated high school at Frederick High in 1986. Same high school as my parents. When I went to school way back when, I rode the school bus which picked me up on Elmer Derr Road. We continued over to New Design Road, which was a hatefully rough tar and chip one lane road back then. We made our way towards north towards Frederick and picked up kids on the whole road at the end of every FARM lane. Younkens, now Part of Wellington Trace, was the first stop, then what is now Robin Meadows, then the King farm, which is now Kingsbrook and up to the Hogan property, which is now a condo complex and on up to town. In the evening, we would come home via Ballenger Creek Pike on a different bus and drop off kids at what is now Hanover and where Corporate Drive is as well as where Tuscarora High School sits ending up at Lintons, which is now developed and continued. At that point we switched back over to New Design Road and dropped off the Geisinger's, which is now owned by Don Pleasants and next the Pages, which is owned by the same, then we continued down to Manor Woods Road and crossed back over to Ballenger Creek Pike in front of Eastalco. From there we went to Cap Stine Road on the south end and dropped off the Biser's, which was sold to Wind Ridge then the Zimmerman farm, which is now owned by the Geisinger's and on around the way to the Noffsingers and finally back to my home. The portion of New Design Road today between English Muffin Way and Frederick is a 4 lane thoroughfare fully developed on both side with residential and Light Industrial. HECK, it even has its own Chick Filet and Royal Farms! That puts you on the map for sure!

The thing that gets me in this whole process is these anti people are what I call "not in my backyard" folks. They all want to preserve the farms, ONLY after the farm that got destroyed to build their developments are completed. Adamstown Commons was the most beautiful sod farm when I grew up, but I guess it's ok to develop as long as they get their homes. My dad grew up in Adamstown. Everyone knows the property as they had one of the first swimming pools in the county when he was young. Manor Village was built on that property and one of my Uncles lived there. Most of these people moving into these new communities aren't from here as the pricing is too high as my nephew is finding out the hard way. My wife and I own a Real Estate Settlement company and I have had a Real Estate License since the early 90s and we see these prices daily. I shake my head each time I hear the complaint about the workers not being from this area coming from the people who more than likely drive to Montgomery and other counties to work.

My point being, this whole county is being and has been developed over the years. It's in my backyard, what can I do to stop it? It has to occur obviously and I don't have to like it. I literally have memories from every property between New Design Road and Ballenger Creek Pike all the way to the Potomac River as I was an avid hunter and got to utilize most of those properties back in the day. My grandfather was a County Commissioner back in the 60s and a farmer as well so getting access wasn't too much of an issue. Little different today as most properties have changed hands.

I would ask you to please consider adding the additional properties requested as in the Horman, Arnold and Argos properties to the north of the current zone. It makes no sense to leave these properties in the middle of two developed areas. I am not asking for rezoning at this point but just to put us on the map for future planning. There is no sense to go through this multi year process again in the future.

I personally welcome the data centers for several reasons. Most people argue that they want to preserve the land. Case in point is the current site that Eastalco sat on which was roughly 900+- acres. Inside that area are three 150-acre sites which obviously total 450 acres +- in turn leaving the other 450 undeveloped, which is what most people don't comprehend. If a developer put homes there, painfully there wouldn't be a 50% land to building ratio. I would also prefer to look at a concrete warehouse structure than high density homes that come with multiple cars per property to further clog up the roads.

As I sit here and type, I can hear the banging of the steel and equipment running at the current site as well as smell the exhaust as we have a southerly wind. It is what it is. I hear the traffic on 340 all day every day and the train coming down from Frederick sounds like it's in my yard. A point about the train, the anti-people that complain about the noise and dust etc. obviously are OK with the trains that come through Adamstown multiple times per day. I can tell you that the daily coal train produces so much dust, it's hard to imagine. I rehabbed a property on Manor Woods Road that sat right next to the train tracks and saw it daily. What's worse is, no one is concerned about what the train hauls through the town every day. I sat at a crossing on Sunday and watched a train of at least 100 tanker cars that had who knows what in

them. And what about the quarry dust and noise? I hear the rock trucks chugging up the hill all day as well as the daily BOOOM around lunch time as they blast the next section. I'm probably 2 miles away direct flight from the quarry, and what about the smell of tar from Tamko? Don't hear much complaining about that. I am also literally ¼ mile from our property on Ballenger Creek Pike so whatever happens to that property will eventually directly impact me and my family so I too have skin in the game.

To summarize, I would once again please request that you add the Horman, Argos and Arnold properties into the overlay, along with the Geisinger and Noffsinger properties. As much as I don't want to see the land go, agriculture is a dying industry these days unless you can farm large amounts of property which no starting person would be able to do. Eastalco was the largest corn producer in Maryland back in the day and perhaps the data centers will allow the additional acreage to be farmed as they currently do. A Geisinger, who attends every meeting, sitting in the room helped run the farm department at Eastalco.

I appreciate your time and consideration and will leave you with this. Its a tough decision to sell property BUT people do it all the time and expect a gain for the risk of the outlay. Some of these properties will create generational wealth, like the Powerball ticket, and people get older and move on in life and have no need for such properties but would prefer the security.

You have a tough decision ahead and hope you look long term in this matter.

Thank you!  
Joe Horman  
240 674-7476

**From:** ctaney23 <ctaney23@gmail.com>  
**Sent:** Thursday, December 18, 2025 11:41 AM  
**To:** Council Members <CouncilMembers@FrederickCountyMD.gov>  
**Subject:** Data Centers

**[EXTERNAL EMAIL]**

Dear Council Members,

Regarding the planned data centers in Frederick County, I think it would be a good idea to look at their history for a moment so we can have the chance not to repeat it....

Loudoun County, Virginia has its own history with data centers. They know about the noise pollution that happens when all the generators fire up. Ashburn residents also are familiar with the severe drain on their limited ground water resources.

Its common sense to look across the river for a moment and see the impact that the data centers have had on our neighbors.

Don't you think?

Thanks for your attention to this very important matter.

Sincerely,  
Chris Taney  
Monrovia



**From:** Ben Livelsberger <livebe01@gmail.com>  
**Sent:** Thursday, December 18, 2025 11:01 AM  
**To:** Gaines, Kimberly <KGaines@FrederickCountyMD.gov>; County Council  
<CountyCouncil@frederickcountymd.gov>  
**Subject:** Ways to Receive Updates Related to Data Center Development in Frederick County

[EXTERNAL EMAIL]

Dear Kimberly Gaines and County Council Members,

Does the county currently have a way for residents to receive email updates regarding items of significance specifically related to data center development w/in the county? The only reason I knew that there was a hearing related to the CDI Overlay was because I stopped my car to read the signs posted along Ballenger Creek Pike. I know that updates are posted to <https://www.frederickcountymd.gov/9128/Critical-Digital-Infrastructure-Overlay->, but I don't know how I can reliably know when that page has been updated.

It would be VERY helpful to have a way for interested parties to receive information and updates directly from the county on data center related topics. It's useful for me to sign up to receive emails from an ad-hoc neighborhood group or from <https://www.sugarloaf-alliance.com/>, but it would be VERY helpful to be able to receive updates on information of note from the county instead of hearing something by word of mouth or from an organization that has a firmly entrenched stance, i.e., pro-data center vs anti-data center.

It would be VERY helpful to be able to receive information such as meeting announcements, notifications that certain information has been added to a web page, or notifications that a particular fact sheet has been released. Also, it would be INCREDIBLY helpful for there to be a single point of contact, a dedicated county employee to whom community members can send relevant information for dissemination. For example, my largest concern when it comes to potentially having a data center built w/in 500 feet of my property line is noise. I want to get in touch with Rowan to arrange a tour, when the time is right, but it would be silly for someone from Rowan to arrange a tour just for me when many others would be interested. I'd like to arrange this with Rowan, but I don't have a way to reliably communicate the opportunity to all of the people who might be interested.

If resources already exist for what I've described above, can you put me in touch with them? My time is limited, but if there is a way that I can be of assistance in accomplishing any of the above or can communicate the opportunities to do so to others, please let me know.

Best regards,

Ben Livelsberger

**From:** Maryrose <[mimilagro@yahoo.com](mailto:mimilagro@yahoo.com)>  
**Sent:** Friday, December 19, 2025 11:39 AM  
**To:** Council Members <[CouncilMembers@FrederickCountyMD.gov](mailto:CouncilMembers@FrederickCountyMD.gov)>  
**Cc:** County Executive <[CountyExecutive@FrederickCountyMD.gov](mailto:CountyExecutive@FrederickCountyMD.gov)>  
**Subject:** Critical Digital Infrastructure Overlay - timing of the vote

**[EXTERNAL EMAIL]**

Dear Council Members:

The Critical Digital Infrastructure Overlay process was described as one that would give residents an opportunity to participate. I have attended many of the council meetings and witnessed speakers address the many concerns with the overlay.

Based on the posted agenda for the December 23, 2025 meeting, it seems that you intend to possibly voting on the proposal and any approved amendments. It is offensive to me and to many of your constituents that you would schedule this meeting in the heart of the holiday season when many people are unable to attend. This suppresses public engagement in this very important issue. An open and transparent process would include an opportunity for public input on the actual text to be considered.

I implore you to reschedule the vote until after the holiday season and to provide ample opportunity for public comment to the full proposal, including any amendments. You owe that to your constituents who will hold you accountable when and if you run for reelection.

Thank you

Maryrose Wilson

12102 Coppermine Road

Union Bridge, MD 21791

**From:** Brenda C <kissdressage@gmail.com>

**Sent:** Friday, December 19, 2025 1:28 PM

**To:** 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>; Young, Brad <BYoung@FrederickCountyMD.gov>; Knapp, Renee <RKnapp@FrederickCountyMD.gov>

**Subject:** Slow down your vote, it's Christmas for Pete's sake!

**[EXTERNAL EMAIL]**

Hi Jerry, Steve, M.C., Kavonte, Mason, Brad and Renee,

I'm Brenda Crist, I live at 7910 Hope Valley Ct, Adamstown, MD 21710. I have been following the years-long saga of data center development in this area.

To be really blunt I am concerned that us little folks are going to basically have our wells contaminated and our power bills skyrocket because big data center interests are more important to the county than us, the people of the county.

You heard from a ton of us little people last week who do not want a huge sprawling data center zone approved. So now you are planning to schedule a vote on this on the day before Christmas Eve! What the heck! Please don't do that. Give us a chance to be there for the vote.

Also, if you are changing anything about the plans, the public should have a chance to see what the changes are and show up again for public commentary so you can hear how your changes will affect them BEFORE you vote on something that will seriously impact our lives, health and pocketbooks.

Thanks so much for all you do to help the PEOPLE (not corporate interests) you represent.

Warm regards and happy holidays,

Brenda Crist

**From:** DIANE & BRUD BICKNELL <bicknell0104@comcast.net>

**Sent:** Friday, December 19, 2025 3:03 PM

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

**Subject:** One More Share RE: CDI Overlay - How Do You Depress a 6-Year Old in Less Than a Minute? (you talk about data centers in the backyard)

**[EXTERNAL EMAIL]**

Dear Leaders,

I thought I was done, but then we took our six year old granddaughter, Rory (council members actually received an email from her early in this process), down Ballenger Creek Pike to see the Frederick data centers. I've attached a video of our conversation. Hopefully your email security system allows you to open the MP4 video. If not, I'll tell you that we talked about how a data center in Pa and Jamma's backyard would affect the wildlife living there. Here are screen shots of the beginning and end of our visit/talk.

Rory concurs that Data Centers do NOT make good neighbors.

Before:



After:



Diane Bicknell  
Char Leigh Circle  
Frederick

On 12/18/2025 6:58 AM EST DIANE & BRUD BICKNELL <bicknell0104@[comcast.net](mailto:bicknell0104@comcast.net)> wrote:

Dear Frederick Leaders,

Two days of testimony about the CDI Overlay has left me baffled. **Even the Council doesn't agree on what exactly we're getting with the data centers already approved.** Maryland has given you a sensible PAUSE button. Wait for a data center study to be completed before you approve any more data center growth, and certainly before you designate a huge area of farmland, next to long-established neighborhoods as a place for future data center complexes.

If you've read my previous emails you know where I stand. **Data Centers are NOT good neighbors.** Their massively intrusive concrete buildings overshadow homes, reduce property values, and fill the neighborhood with pollution, lights, noise, and possibly many unseen dangers that a study could reveal. You cannot dispute that they hurt the unlucky Frederick residents who live near them in communities that were approved over 50 years ago.

Please keep the approved build zone within the boundaries proposed by the Planning Commission and wait for the results of the Maryland study.

Diane Bicknell  
Char Leigh Circle  
Frederick

On 12/02/2025 12:39 PM EST DIANE & BRUD BICKNELL <[bicknell0104@comcast.net](mailto:bicknell0104@comcast.net)> wrote:

Dear Council Members, County Executive Staff, and Planning Commissioners,

As the County Council heads to the finish line with a decision about the best boundaries for data center growth in Frederick County, **I'm writing once again to speak out against the CDI overlay that includes land next to neighborhoods.** I have sent you articles about how data center growth is negatively changing small communities in Virginia, a video taken next to a data center compound in Ashburn that reveals the constant noise made by their huge air conditioning units even on a 65 degree day (email 11/4/2025), and pleas from my 6 year old granddaughter to continue to protect farmland that is home to a large variety of wildlife. I hope that one or all of my submissions has caused you to look away from the temporary monetary windfall and see how permanently damaging such a huge data center complex would be.

**Please follow the Planning Commission's proposal for a much reduced data center growth area.** This topic can always be revisited in the future once we know the exact impact that the data centers will have on our communities and resources. Please protect our beautiful farmland as well as the right to the "Frederick quality of life" for ALL of the citizens of Frederick County, and not just those who wouldn't need to worry about data centers invading their neighborhoods.

Diane Bicknell  
Char Leigh Circle  
Frederick

**From:** Zachary Schafer -MDE- <zachary.schafer@maryland.gov>  
**Sent:** Friday, December 19, 2025 9:47 AM  
**To:** Hope Green <hope.green76@yahoo.com>  
**Cc:** Shannon Heafey -MDE- <shannon.heafey@maryland.gov>; County Executive <CountyExecutive@FrederickCountyMD.gov>; Council Members <CouncilMembers@FrederickCountyMD.gov>; Planning Commission <PlanningCommission@FrederickCountyMD.gov>; Brandon Brooks -MDE- <brandon.brooks@maryland.gov>; neiswinter.ian@epa.gov; william.folden@senate.state.md.us; April Delegate Miller <april.miller@house.maryland.gov>; Jesse Delegate Pippy <jesse.pippy@house.maryland.gov>  
**Subject:** Re: Diesel Generators

**[EXTERNAL EMAIL]**

Dear Hope,

Thank you for your outreach. I'm acknowledging receipt on behalf of the Department. We will enter this email as a formal comment on the open permit and respond accordingly after the comment period closes.

Best,  
Zach



**Zachary Schafer**  
**Assistant Secretary**  
Maryland Department of the Environment  
1800 Washington Blvd.  
Baltimore, MD 21230  
[zachary.schafer@maryland.gov](mailto:zachary.schafer@maryland.gov)

On Fri, Dec 19, 2025 at 12:55 AM Hope Green <[hope.green76@yahoo.com](mailto:hope.green76@yahoo.com)> wrote:

1. Health Impacts Have Tripled (November 2025 Study): A study released on November 21, 2025,

by the University of California, Riverside, found that public health damages from data center pollution

have tripled in four years (2019–2023), specifically identifying diesel backup generators as a

primary source of dangerous particulate matter (PM 2.5) and Nitrogen Oxides (NOx).

2. Virginia Regulators Admit "Worst Case" Scenario (December 15, 2025): A legislative report

found that in a "worst-case scenario," data center generators in Northern Virginia could release

9,000 tons of Nitrogen Oxides annually—roughly equal to half of all annual emissions from

all other sources in the region combined.

3. The Public Service Commission (PSC) noted that granting exemptions would allow a

single site to operate 168 diesel generators (Aligned DC, already approved) simultaneously, creating

emissions equivalent to a 504 MW power plant.

4. The World Health Organization (IARC) classifies Diesel Engine Exhaust as a Group 1 Carcinogen

(Proven to cause cancer in humans).

<https://www.globalpwr.com>

## EPA Compliance for Diesel Generators Simplified

POSTED ON [DECEMBER 8, 2025](#) BY [GPS TEAM](#)





Environmental regulations for diesel generators have grown increasingly complex. Facility leaders want certainty that their power systems are reliable, legally compliant, and engineered for long-term resilience. This guide breaks down how the EPA regulates standby diesel generators, clarifies the meaning of Tier 4 Final vs Tier 4 Certified vs Tier 4 Compliant, explains allowable operating hours for emergency standby use, and introduces **two important concepts often overlooked in emissions discussions: standby rating vs prime rating and why the largest diesel generators are still manufactured to Tier 2 standards.**

## How EPA Tier standards evolved: Tier 1 through Tier 4 Final

EPA emissions standards for nonroad diesel engines have tightened steadily for more than twenty-five years. The progression looks like this:

- **Tier 1:** Introduced in the late 1990s.
- **Tier 2:** Rolled out in 2007 with limits on nitrogen oxides (NOx), particulate matter (PM), and hydrocarbons. Applies to standby generators above 450 kW.
- **Tier 3:** Rolled out in 2007 with limits stricter than Tier 2, but applies only to 37-450 kW standby generators.
- **Tier 4 Interim (Tier 4i):** Added in 2011 for larger engines to begin reducing particulate matter.
- **Tier 4 Final (commonly referred to simply as Tier 4):** The most stringent standard was fully implemented by 2015, requiring major reductions in NOx and PM.



Manufacturers and customers sometimes refer to “Tier 4 Final” and sometimes use “Tier 4.” Today, the term “Tier 4” is generally understood to represent the final and most advanced stage of rulemaking for this Tier.

## The meaning of Tier 4 Certified vs Tier 4 Compliant

These two terms often cause significant confusion, yet the differences affect equipment selection and emissions permitting.

### Tier 4 Certified

- The engine and complete generator package are tested, documented, and certified through the EPA’s official process by the OEM at the OEM’s Factory.
- Units carry EPA certification labels.
- Generally required for applications outside of true emergency standby use, including non-emergency, prime power, and any program involving demand response in parallel operation with the grid. This depends on the local Authority Having Jurisdiction (AHJ), state or region of operations.
- Not permissible to bypass DPF and/or SCR if they were to fail. Engine would not be able to run in the event either item failed.

### Tier 4 Compliant

- **3rd Party Integration of aftermarket treatment products (i.e. SCR and DPF) to achieve EPA Tier 4F equivalent emissions levels.**
- **Onsite testing is often required to verify emissions levels.**
- **Often acceptable in the same applications as Tier 4F Certified.**
- **Can be used to retrofit existing equipment.**
- **It is permissible to bypass diesel particulate matter filter and/or SCR solely if they were to fail. Engine could continue running in the event those items fail.**

COMMENT: THIS IS UNACCEPTABLE. I DO NOT TRUST  
AMAZON

TO INSPECT FOR FAILURE OF T4 ADD-ONS. AS LONG THE  
GENERATORS

CONTINUE TO RUN, THEY WON'T BOTHER ABOUT  
IT. MDE

WILL NOT BE ABLE TO INSPECT IN A TIMELY  
MANNER.

## Standby rating vs prime rating: why it matters for emissions

Every diesel generator is rated according to its intended operating profile. The EPA refers to these categories when determining what emissions tier applies.

### Standby Rating

- Intended for use only during utility outages.
- No limit on run hours during an actual outage.
- Strict limits on non-emergency hours, commonly 100 hours per year or less for testing and maintenance, but actual limits depend on local air-district rules.
- Because standby generators are expected to run infrequently, they are allowed to meet less stringent emission standards if classified strictly as emergency standby, typically Tier 2 or Tier 3.

COMMENT: Because the so-called backup generators have been made to be T4 compliant, I feel as

is the CC giving permission to the data centers to run at prime (outside of emergency),

if they don't have sufficient power by the time they intend to go online! Loophole?

### Prime Rating

- Intended to run for extended periods and carry a variable load.
- Used when there is no utility power or in locations where regular, long-duration generator operation is required.
- Prime-rated generators fall under tighter emissions requirements because they accumulate significantly more operating hours.
- Prime power applications typically require Tier 4 Certified emissions unless located in very specific jurisdictions with exceptions.

Understanding your true operating profile is essential. If a facility exceeds allowable non-emergency hours on a standby generator, the engine can be reclassified as non-emergency. That reclassification can trigger Tier 4 requirements even if the generator was originally purchased for emergency use.

COMMENT: HAS THE CC HAS GIVEN THE DATA CENTERS A LOOPHOLE

THAT THE EPA WOULD NOT APPROVE IF KNOWN?

## EPA Emergency vs Non-Emergency Classification (NSPS)

The US EPA New Source Performance Standards (NSPS) classify stationary engines based on brake horsepower and use type. These classifications determine which emissions standards apply and directly influence whether a generator can operate under Tier 2, Tier 3, or Tier 4 requirements.

### Stationary vs Portable/Mobile

#### Stationary Engines

- The generator remains in one location for more than 12 months.
- These units must meet EPA stationary engine standards, which include the full tier structure.

**COMMENT: CORRECT ME IF I'M WRONG, BUT THE GENERATORS WILL BE STATIONARY!**

#### Portable or Mobile Engines

- Designed to be moved from site to site.
- Must meet US EPA non-road engine standards, which follow a different compliance pathway than stationary engines.

### Emergency Classification

Generators classified as emergency engines fall into what most organizations refer to as Standby units.

Characteristics include:

- The generator is not the primary source of power and operates only when the utility supply fails.
- There is unlimited runtime allowed during an actual utility outage.
- Maintenance and readiness testing are limited to 100 hours per year or less, depending on size of genset and/or local requirements.
- Any use outside true outage events must follow strict limits to retain emergency status.

This classification allows the use of Tier 2 or Tier 3 engines in many jurisdictions, provided the engine stays within emergency-only restrictions.

### Non-Emergency Classification

Generators classified as non-emergency engines are commonly referred to as prime or continuous power systems.

Characteristics include:

- The generator is the primary power source, or

- The generator supplements the utility in applications such as peak shaving, interruptible rate programs, or any use that generates income by exporting power to the grid.

Non-emergency generators accumulate more annual operating hours, so the EPA requires significantly cleaner emissions performance. This is where Tier 4 Certified power systems and Emissions After Treatment Systems (EATS), such as SCR and DPF, become required in most regions.

## How many hours can an emergency standby generator operate legally?

EPA rules allow emergency standby generators to run:

- Unlimited hours during a true utility outage.
- Limited hours for testing and maintenance, typically 100 hours per year or less, depending on jurisdiction and size of genset.

Running beyond those limits or using the generator for peak shaving, demand response, or load management changes the classification. Once that happens, Tier 4 Certified generators are required in most regions.

State and local air districts, especially in major metropolitan areas considered non-attainment zones, often impose even stricter caps. Always confirm local regulations before establishing test schedules or non-emergency use profiles to ensure compliance.

COMMENT: FREDERICK COUNTY IS NONATTAINMENT FOR 8-HOUR

OZONE. ADAMSTOWN HAS NO AIR-QUALITY MONITORING, SO WE DON'T KNOW IF WE ARE NONATTAINMENT FOR OTHER CONTAMINANTS.

## Why many of the largest diesel generators are only manufactured to EPA Tier 2

This is one of the most misunderstood topics in the power generation industry. Large standby diesel generators in the 500 kW to 4000 kW range, such as the [Cummins DQKAN 2500 kW](#), are typically produced as Tier 2 engines from the factory. Three major factors drive this:

1. Engineering and combustion realities at very high horsepower

Engines exceeding approximately 1600 horsepower face significant challenges in meeting Tier 4 Final standards without after treatment. Achieving Tier 4 inside the engine alone would reduce efficiency, raise exhaust temperatures, and increase fuel consumption. Manufacturers design these large engines as Tier 2 to maintain durability, reliability, and stable power output under high loads.

## 2. Intended operational use

Large generators, ranging from 500 kW to 4 MW, are predominantly purchased for emergency standby applications in data centers, hospitals, industrial facilities, and utility infrastructure. Under EPA rules, emergency standby generators can use Tier 2 engines as long as they stay within emergency-only operating limits. Because they are not expected to run continuously, the emissions impact is limited.

## 3. After Treatment allows Tier 4 performance when required

Although the engine itself is Tier 2, the complete generator system can still achieve Tier 4 Final emissions when an Emissions After Treatment System (EATS) is installed. Two common technologies are:

- **Selective Catalytic Reduction (SCR)** for NO<sub>x</sub> reduction.
- **Diesel Particulate Filter (DPF)** for PM reduction.

When engineered correctly, SCR and DPF systems enable a Tier 2 engine to meet Tier 4 Final emissions levels. This approach has several advantages:

- Lower cost compared to building a ground-up Tier 4 engine.
- Proven reliability for high horsepower applications.
- Flexibility to meet differing state and local emissions rules.
- Ability to retrofit after installation if operating needs change.

This is why many large Tier 2 generator models are routinely integrated with after treatment systems for facilities that need prime power, extended operation, or stricter Tier 4 compliance.

## The impact of local regulations: metro vs rural differences

EPA regulations are the national framework, but state and regional air districts often add their own rules. In major metropolitan areas, air quality challenges drive stricter limits on particulate matter and NO<sub>x</sub>. This means:

- Tier 4 Certified units may be required even for emergency use.
- Annual test hours may be capped below federal allowances.
- After treatment may be mandated on larger generators.
- Permit processes can be more extensive.
- Typically the local AHJ requires "Generator Log" book to record testing, outages and scheduled (OM) Operational Maintenance.

COMMENT: I DON'T TRUST AMAZON TO KEEP ACCURATE LOGS AND I NO LONGER TRUST MDE TO INSPECT THAT THEY DO. HOW CAN THEY TIMELY

INSPECT THESE LOGS GIVEN THE ESTIMATED AGGREGATE (1,000)? WHAT IF THE DATA CENTER WERE TO FALSIFY THE LOG?

In rural regions or attainment zones, Tier 2 standby-only units may still be acceptable. This is why emissions compliance must always be evaluated at the local level, not just federally.

COMMENT: WE ARE NONATTAINMENT! WE DO NOT HAVE MONITORING

AT THE LOCAL LEVEL. OUR NONATTAINMENT STATUS IS REPORTED AT

THE FEDERAL LEVEL BY EPA!

## Choosing the right generator and emissions package

Your facility should consider:

- True operating profile: standby or prime.
- Location and applicable air district rules.
- Load requirements and peak demand conditions.
- Future expansion and potential use cases.
- Availability of after-treatment systems for Tier 4 Final compliance.
- Long-term cost of ownership, including permitting and fuel profile.

Selecting the correct rating and emissions tier from the beginning avoids costly redesigns, unexpected permitting issues, and operating restrictions later.

## Support from Global Power Supply

Global Power Supply provides [expert engineering](#), turnkey project management, and emissions compliance guidance for backup power systems. Our team helps evaluate your load profile, location, regulatory requirements, and operational goals to recommend the right generator rating and emissions strategy. From Tier 2 emergency systems to complete Tier 4 Final packages with SCR and DPF integration, we deliver solutions that keep your facility compliant and resilient.

Global Power Supply is committed to helping customers navigate complex regulations with clarity and confidence.

COMMENT: IT'S CLEAR ALIGNED AND AMAZON DID NOT CONSULT WITH INDUSTRY EXPERTS. SPEED AND SCALE AS CHEAPLY AS POSSIBLE. DIESEL EMISSIONS ARE CARCINOGENIC, PM2.5 AND ULTRA FINE PARTICULATE IN THE EMISSIONS (T4 COMPLIANCE DOES NOT MEAN "ZERO PARTICULATE.") THE WIND CAN BLOW PARTICULATE MATTER HUNDREDS OF MILES AFFECTING THE HEALTH OF THE ENTIRE COUNTY.

1. Health Impacts Have Tripled (November 2025 Study): A study released on November 21, 2025, by the University of California, Riverside, found that public health damages from data center pollution have tripled in four years (2019–2023), specifically identifying diesel backup generators as a primary source of dangerous particulate matter (PM 2.5) and Nitrogen Oxides (NOx).
2. Virginia Regulators Admit "Worst Case" Scenario (December 15, 2025): A legislative report found that in a "worst-case scenario," data center generators in Northern Virginia could release 9,000 tons of Nitrogen Oxides annually—roughly equal to half of all annual emissions from all other sources in the region combined.
3. Maryland PSC Warning (Aligned Data Centers Case): The Public Service Commission (PSC) noted that granting exemptions would allow a single site to operate 168 diesel generators simultaneously, creating emissions equivalent to a 504 MW power plant.
4. Established Science: The World Health Organization (IARC) classifies Diesel Engine Exhaust as a Group 1 Carcinogen (Proven to cause cancer in humans).

My current residence is 500' from the Amazon facility. My husband is very ill possibly from blowing dust from the construction of the Amazon facility. Now, we have to worry about diesel emissions (a known carcinogen) wafting over our property. MDE should consider other options to Amazon's diesel generator permit. We are not safe in our home; Aligned DC is less than a mile from us. Their 168 generators, already approved plus Amazon's 99 is frightening to us.

Can MDE assure us that their approval of over 200 diesel generators won't be detrimental to our health?

Respectfully,

Hope Green  
Adamstown, Maryland

From: Steve Poteat <cspoteat@gmail.com>  
Sent: Friday, December 19, 2025 2:33 PM  
To: Council Members <CouncilMembers@FrederickCountyMD.gov>; Young, Brad <BYoung@FrederickCountyMD.gov>  
Subject: CDI Overlay, public hearing

[EXTERNAL EMAIL]

**Congratulations**, you have a great opportunity to make the best decision possible on data centers in Adamstown. With the State's decision to move ahead with the cost benefit study on data centers you shortly will have available the knowledge needed to make informed decisions on data centers. With approval of the Planning Commission's recommendation at this time and a further consideration once the State's study is completed you will have the essential information to make a decision in the best interests of the County. Thank you. Steve Poteat, Sugarloaf Mountain Rd Sent from my iPad

**From:** Maryrose <mimilagro@yahoo.com>  
**Sent:** Friday, December 19, 2025 11:39 AM  
**To:** Council Members <CouncilMembers@FrederickCountyMD.gov>  
**Cc:** County Executive <CountyExecutive@FrederickCountyMD.gov>  
**Subject:** Critical Digital Infrastructure Overlay - timing of the vote

**[EXTERNAL EMAIL]**

Dear Council Members:

The Critical Digital Infrastructure Overlay process was described as one that would give residents an opportunity to participate. I have attended many of the council meetings and witnessed speakers address the many concerns with the overlay.

Based on the posted agenda for the December 23, 2025 meeting, it seems that you intend to possibly voting on the proposal and any approved amendments. It is offensive to me and to many of your constituents that you would schedule this meeting in the heart of the holiday season when many people are unable to attend. This suppresses public engagement in this very important issue. An open and transparent process would include an opportunity for public input on the actual text to be considered.

I implore you to reschedule the vote until after the holiday season and to provide ample opportunity for public comment to the full proposal, including any amendments. You owe that to your constituents who will hold you accountable when and if you run for reelection.

Thank you

Maryrose Wilson

12102 Coppermine Road

Union Bridge, MD 21791



**From:** Hope Green <hope.green76@yahoo.com>

**Sent:** Friday, December 19, 2025 1:59 PM

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

**Cc:** Planning Commission <PlanningCommission@FrederickCountyMD.gov>; Jenkins, Chuck (Sheriff) <CJenkins@FrederickCountyMD.gov>; Michael Kuykendall <mkuykendall@catellus.com>; Gary Cudmore <gcudmore@rowan.digital>

**Subject:** WFMD radio interview, Council President Brad Young

**[EXTERNAL EMAIL]**

Council President Brad Young,

As Frederick County Council President when you speak publicly people assume you speak for the entire council and the County Executive. Which is why my email is addressed to the entire Council, County Executive and Planning Commission as they are integral in your words and decisions. Wish I could say that for Planning and Permitting Dept, but they seem to be a whole other faction, with too much power and too little oversight.

I resent your remarks on the radio. Apparently, you ignored Councilman McKay's and Carter's report to you of the warnings of our power crisis from the Dec. 8th meeting with MDE and our legislators that both Councilmen attended. We were warned of rolling brownouts and blackouts.

I resent your remarks and the County Executive's previous remarks that the data centers were approved for the Eastalco site because of existing infrastructure. The ONLY infrastructure existing was a power line that had been brought in over a quarter of a century ago for Eastalco. And it wasn't enough for them (a fraction of the size of what Quantum will be.) Power in Adamstown went out a lot then. I remember my dad, a dairy farmer, had to hookup one of our tractors at the power pole as a generator. Dairy farmers milk their cows twice a day every day. When power goes out, the milkers drop from the cow's udders, milk does not flow to the holding tank, and the tank doesn't churn or keep the milk cold. As I'm writing this, my lights are flickering from high winds. You should see the new, very tall utility poles installed along New Design Road all the way from Nolans Ferry to the Quantum campus. Are we paying for that? I've travelled the world, visited concentration camps in Germany and when I saw those power poles go up, concentration camp came to mind. Why weren't the power lines buried with the Qloop?

Two-lane country roads, insufficient water supply, no air-quality monitoring (despite being in a nonattainment area), no police presence (they are overwhelmed as it is, Sherrif Jenkins spoke about this on the 17th) and insufficient fire/EMS coverage for the campus, INFRASTRUCTURE that is lacking or nonexistent. I was almost hit head-on by a flag vehicle for an extra-wide tractor trailer coming down Mountville Rd from Rt 15 as I was driving to Rt 15. The flag driver was speeding and was in my lane on a blind curve. Luckily, I was able to swerve to the edge of the road as I was not speeding. There are no shoulders on Mountville except at the westbound intersection of Mountville and Ballenger.

Yes, data centers have been in Frederick County for years in Urbana. They are traditional data centers, not hyperscale. FNMA'S generators are inside the building, siting and appearance fit in with the community and is not 500' from a residence.

I can't express my sadness and depression of losing my viewshed, peace and quiet, my well, night skies and soon clean air and most of all my well-being. I had a beautiful property that was to be my retirement home. I now live in fear as to what's to come. I had a panic attack when you mentioned berms. The berm between my property and Bauxtie 1 (Amazon) is a disgrace. Nothing like what I was told it would be and nothing like what the **KNAPP-YOUNG BILL** said it was to be. I'm so close 500'+/- to Amazon that I can clearly see people's faces when they're working on the roof. **KNAPP-YOUNG BILL** says the berm plantings should be of a certain caliper to provide proper screening in 2yrs and that the plantings should be an appropriate number of evergreens to screen when deciduous trees lose their leaves. When I complained to a HITT supervisor that the berm was insufficient, he replied that when FC's inspectors come, they say you're good and in compliance. I was not surprised, only angered! You don't care to enforce your own regulations.

I'm angered by your words and what seems to be your (you, your cohorts on the Council and the CE) contempt of a community that does not deserve what's been put upon it. Council President Young, you've all but said in previous public hearings that Adamstown was sacrificed for the greater good. But that's not true because the entire county will experience rising electrical costs, harmful air quality, rising property taxes, water scarcity, a growing ALICE community, loss of property value and lack of trust in their government. It's like saying we're giving Adamstown to the Russians/Iranians, so they won't nuke the rest of the county. In this case the Russians/Iranians are the data centers and the ultimate damage that they will cause will be in no small equivalence to nuclear disaster.

Adamstown was sold to a polluting, resource depleting, contemptable industry without due diligence and proper analysis. I don't blame the data centers. They just do what they do as an industry. And, I've had more assistance and help from them than anyone in my government. The blame is squarely on the Governor and the County Executive and those in the Council who support her in this travesty, in my opinion.

I don't know how you and your cohorts and the County Executive sleep at night. Don't tell me it's on a mattress from Mattress Firm, because if I had any say about it, you'd all be sleeping on a bed of nails! Be cautious of your words, Council President Young, because you speak for the entire County government. Your constituents are listening and many of them are angry.

The unfortunate truth is that you cannot make things better for us, you cannot protect us from the harmful effects of the data centers (i.e. water contamination, diesel emissions from generators and vehicles, noise (don't believe add-on T4 parts do anything to diminish noise.) Nor can you restore our well-being, resurrect our viewsheds, provide clean air or produce clean water that doesn't exist or restore property value. At this juncture, you, your cohorts and the County Executive can only make matters worse by extending the Overlay beyond the current campus. God help us all if you do!

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