



March 1, 2022

Council President Keegan-Ayer
Members of the Frederick County Council

Re: Bill No. 22-05

Dear Council President Keegan-Ayer and Members of the County Council,

Envision Frederick County, Inc. is writing regarding Bill No. 22-05 Concerning: Amending Chapter 1-19 of the County Code (Zoning Ordinance) to add Critical Digital Infrastructure as a New Use, and to voice our broad support.

In general, this is a good and necessary bill. As you know, Quantum Loophole is establishing a data center at the former East Alcoa site in Frederick, County and at least one other organization, Amazon Web Services, has made inquiries about establishing additional data centers. In our digital age, the need for these centers will only grow, so it is in the best interest of our County to establish guidelines for their placement and design.

It makes sense that data centers are to be placed in Industrial and Limited Industrial zones and we are pleased to see that requirements are to be put in place to have data centers blend in with the surrounding community. Establishing an Architectural Review Committee is an excellent idea! We are also pleased to see that measures will be taken to abate noise and light pollution.

Although we support the establishment of this bill, there are other items that we ask you to take into account considering our climate emergency.

First, data centers use a huge amount of energy. It would be beneficial for an energy use analysis to be required to ascertain the impact of such use on the infrastructure and county in general, and to look for alternative sources and/or alternative designs to minimize its impact. The County should require that the energy sourced is clean and renewable. This is critical and would be advisable for all proposed large industrial buildings.

Second, data centers use a large amount of water for cooling. To protect other County residents from potential flooding and sinkholes, the County should consider requiring a comprehensive water management plan that covers the source of water, treatment of water and disposal of water, and addresses these factors based on anticipating storm events that produce volumes of water in increased levels over time aligned with current National Oceanic and Atmospheric Administration (NOAA) projections.

Thank you for your consideration.

Regards,

Elizabeth Bauer
Chair, Envision Frederick County

Cc: County Executive Gardner

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