

General Recommendations

(1-18-24 R2)

The following General Recommendations don't fall neatly into any of the three sub-group areas of focus, but are things the DCWG feels are important for County Gov't to consider. In no particular order, they are:

- 1) We encourage the County to urge the State to: (a) Study the cumulative effects of data center development on the State's overall electrical grid, water resources, environmental/climate goals, land conservation efforts, and our quality of life, and harmonize same across relevant State departments and agencies, (b) In particular understand the projections and impacts for power needs by this industry over time, including new transmission lines/paths, generating capacity, and the impact to other rate payers.

Reason: Unlike other traditional industries or businesses, large hyper-scale data centers consume an inordinate amount of electricity, and potentially water, with corresponding impact, as well as impacts to the State's land conservation and climate goals.

- 2) We encourage the County to: (a) Consider putting an overall top limit on data center growth in the county, whether based on square footage, total acreage, or another metric, and (b) Concurrent with this, the County should consider withholding additional data center site approvals (non-East Alcoa location) as and until the Quantum Loophole site build-out progresses and the County and State have a better understanding and appreciation for the impacts of the industry, both positive and negative.

Reason: An overall limit to data center development in the County would: (a) Reduce the impacts of item # 1 above, and (2) Reduce the potential for the County to become too financially dependent on revenues from a single industry, as has become the case in neighboring Loudoun County VA, with the attendant "shock" associated therewith if, as and when inevitable technological changes in the data center industry occur.

- 3) Require that any ordinance covering this industry be reviewed periodically, perhaps more frequently initially (every ~2 years).

Reason: (a) The County is and will continue to be in a "learning curve" mode as the industry develops, and can consider making mid-course adjustments to legislation, (b) Ensure legislative regulations keep pace with technological changes and advancements.

- 4) Ensure that any regulations involving performance metrics for this industry include periodic and reliable monitoring (ideally automated, and/or consider 3rd party monitoring contracts), and that any remedies and enforcement are impactful in effecting compliance.

Reason: Industry accountability and compliance for the public good.

- 5) Require that Frederick County emergency responders are properly trained and equipped for any specialized responses they may encounter associated with serving this industry.

Reason: The specialized attributes of this industry, particularly scale, may be new to Frederick County emergency responders (such as large battery storage areas, non-aqueous coolants, large on-site fuel storage etc.).

- 6) Require that data center owners repurpose or demolish building(s) at their useful end of life (EOL) or within X months of the building no longer being used.

Reason: These are exceptionally large, monolithic buildings that impair the viewshed, as well as impede recharge of the aquifer.