

I'll start by thanking the Council for finally recognizing that it's not appropriate to leave data centers in the zoning category of "cable communications system." With 4 data centers already built and one in the hopper, better late than never. But you shouldn't use that delay to pressure you into a false sense of urgency to promulgate these zoning and regulatory changes. It's imperative that we get these correct, and right now, I think we're all in a position of not knowing what we don't know. ZTA 26-01 has good pieces in it, but it's incomplete, and we need time and unbiased expertise to do this right, so I ask that you declare a moratorium while that process unfolds. We need the task force—with improved representation—that's described in Council member Glass' bill. And why would we not wait for the results of the state task force on data centers?

The differences in scale of data centers are huge and that's not recognized in this ZTA. The reference to existing maximum decibel levels for sound limits is irrelevant, because the low frequency levels that data centers emit need to be held to a different standard. It's constant, not intermittent, and there are studies showing that these low frequencies can have neurologic and cardiac impacts on people. The ZTA calls for extra setbacks for residential areas—but is 500 feet sufficient for low frequency noise? And that extra setback should include the AR; we've got lower ambient noise here, and fewer structures that might block the sound, so that rumble will likely carry much further distances than in other areas. We know there are health impacts on humans; are there studies on the impacts on livestock?

Although the current proposal for a data center in Dickerson would not use groundwater, we need to codify the prohibition of use of ground water in an area for which it's the sole source of drinking water. And about that Potomac River water that the Dickerson data centers would use; I know that requires a state permit, but on Atmosphere's application, they are asking for 200,000 gallons per day. In their public fact sheet, they claim that's 900 times less than the old coal plant used. Is it? We know that the water comes out warmer than it went in, and they say that "releases will align with ambient air temperature." To me, that means in the summertime, when the air's warmer, the water they release will be warmer—at a time that Potomac River water is already it's warmest, and when the river is frequently at its lowest. In any case, their using historic references to make their case is pretty irrelevant; we live in a much different climate than when that coal plant was deemed necessary and built in the late 50s. And it closed because it couldn't meet state standards.

We all know that data centers use enormous amounts of energy, and there's talk about requiring them to purchase green energy or to help build it, but have you actually looked at whether that's possible? How do we ensure that all the supposed green technology a proposal may include is actually going to make a significant difference in water use and energy use? We need a thoughtful analysis of our ability to meet our County's climate commitments before we encourage the building of data centers.

Do we really not care about the type of work for which the data centers may be built? Are we concerned at all with the many hyperscale data centers in the DC area being used for surveillance of our communities by the federal government? Would we be okay with a data center here that's being used for bitcoin mining? I understand that Atmosphere says it will be a "working data center" but do we know what that means? Does the developer get to define what that means?

How will the county enforce any standards it sets for data centers? Will there be periodic inspections?

Do we know if we've got the tax system in place that will best allow the county to benefit from data center operations? Everyone likes to cast their eyes on the fantastical dollars that Loudoun County is making—but that's because they collect personal property tax on all the equipment within the data centers. And because that equipment is replaced on average every 3-5 years, that's a pretty continuous major tax stream. Speaking of; what happens to all that electronic equipment? Does it end up in the county waste stream? How much does a hyperscale data center boost our waste? Can we require recycling of the electronics?

Tech bros proselytize about a future with AI everywhere, real estate developers with vested interests greenwash the development of these campuses and hedge fund managers pursue them for their investment returns. That's quite a force arrayed against your constituents. I am certain that despite their nice words, they are not concerned about your residents, about our drinking water supply or about our electric rates. Only you and we are. Thank you.

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