

Testimony for ZTA 26-01 Commercial Uses – Data Center

To: Montgomery County Council
From: Nature Forward
Date: February 24, 2026
RE: Zoning Text Amendment (ZTA) 26-01, Commercial Uses – Data Center
Position: Favorable



Dear Council President Fani-González, Vice President Balcombe, and Distinguished Councilmembers,

We are Nature Forward, the DC metro area's oldest independent environmental organization. While we acknowledge that data centers serve the needs of modern society, we are extremely concerned with the land, water, energy, health, and community impacts of unchecked data center growth. It is imperative that Montgomery County takes immediate action to meet these challenges head-on.

We applaud the offices of Council President Fani-González, Vice President Balcombe, and Councilmember Sayles for understanding the importance of data center reform in Montgomery County. However, we also urge adopting the following amendments to better protect Montgomery County's ecosystems and residents.

1. We recommend adopting FERC's definition of a data center, which has an energy demand of greater than 20 MW¹. We are advocating for this definition at every level of government to be as standardized as possible, while still acknowledging that edge/enterprise data centers do not have the same impact as hyperscale data centers.
2. We recommend clarifying from where the 500-foot setbacks will be measured from. Although we agree with this provision, it is unclear if setbacks will be measured from the property line or the generators. To mitigate the public health impacts of diesel generators, we recommend the setback should be measured so as to keep houses and businesses as far away as possible from polluting equipment.
3. While we appreciate that the ZTA has higher standards than required by the state for diesel generators, we strongly recommend that no diesel generation (even Tier IV) be permitted at all, in favor of battery storage and carbon-free backup energy

¹ <https://www.ferc.gov/rm26-4>



sources. Diesel generators of any kind have major public health consequences; diesel exhaust is associated with adverse health impacts, including respiratory diseases² and cancer³. Montgomery County is also already socializing the health costs of Northern Virginia's diesel generator use⁴, which would only be worsened by permitting diesel generators in Montgomery County. Battery storage and other carbon-free backup energy sources are viable alternatives to diesel⁵ and should be implemented instead for the health and environmental welfare of Montgomery County.

We are hereby supporting the ZTA with these amendments.

Thank you for your time and consideration.

Sincerely,

Calvin Chrisfield
Maryland Data Center Intern

² <https://doi.org/10.1201/9780367456252-21>

³ <https://doi.org/10.1080/08958378.2020.1725187>

⁴ <https://arxiv.org/pdf/2412.06288>

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https://www.canarymedia.com/articles/batteries/texas-data-center-open-sooner-grid-battery?utm_content=buffer1dcf8&utm_medium=social&utm_source=linkedin.com&utm_campaign=buffer