

From: Stephen Jascourt
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Montgomery County District Council

To:

Written testimony for Feb 24, 2026 hearing on ZTA 26-01 Commercial Uses – Data

Subject: Center (I am not signed up for live testimony, only submitting these written comments)

Dear District Council:

I have two specific concerns regarding ZTA 26-01 as written:

1. The definition of Data Center needs clarification. If I were to have several (say 2 or 3) laptops in my house and they are networked and they store data from the internet and process that data to produce graphics that are then served over the internet (for example, weather forecast data plots), would that make my house a data center? Suppose the web pages are public and hosted on my home computer? Suppose the same but they are hosted on some remote web server elsewhere? It would be a building which houses computers that store and process and transmit digital data.

Would the same be true if instead of serving data on web pages over the internet, it just performs web browsing including interactive sessions such as Zoom meetings? In that case, the house is a building which houses computers which store (cached) data and transmit digital data, and there is some processing and managing of that data as well. For most of us involved in home meetings such as your live hearing or telework for our jobs, our residences seem to meet the criteria for Data Centers as defined in ZTA 26-01 B 1.

2. As an atmospheric scientist and concerned citizen, I am concerned about the emissions from the power sources supplying power to large data centers. The requirement that any generators must meet Tier 4 diesel generator standards, while reducing NOx and particulate matter emissions, does not reduce much of the greenhouse gas emissions. Such a generator will emit approximately twice (actually a bit more than twice) as much CO2 as the same amount of power supplied by PEPCO, based on the Maryland Environmental Fuel Source Information sheet sent by PEPCO for its emissions and known typical fuel consumption and corresponding emission rates for generators. The ZTA does not specify whether the generator is only for backup purposes or any limits on size or annual power generation and does not require renewable energy sources and/or battery energy storage systems. It is assumed that in the review process for each site, such considerations would be handled on a case-by-case basis. However, that leaves open the possibility of inadequate oversight and leaves open the possibility of putting our county climate plan targets out of reach. This is part of a nationwide problem with data center proliferation in which many of the data centers are choosing to build with their own generation supplied by diesel generators in order to avoid the waits for interconnection approvals for their loads. Since they are not adding their loads to interconnections, there is no systematic accounting of them in the emissions accounting for utilities and regional transmission organizations (RTOs, e.g., PJM). The result will be a large aggregate national emissions source that is adding to our carbon footprint and does not have transparent accounting. Montgomery County should not be contributing to that problem. Instead, we should be a leader in preventing it. We can include annual emissions capping limits such as would be consistent with use of the generator only as back-up power and transparent reporting or we can prohibit fossil fuel generators.