

March 5, 2016
Re ZTA 26-01

I thank the County Executive and the Council for having already identified a number of major concerns regarding data centers. I also concur with other residents and resident groups that some topics are missing from their consideration. Given the disruption that a data center can cause to residential communities, I believe the County should pause any data center applications or deployment until it formulates and implements comprehensive data center policies.

In addition to the more often cited important concerns such as the environmental impact of data centers on air, water, and woodland quality there is an absence of adequate discussion and inclusion of the electromagnetic effects. The County has local control of data centers and should take positions consistent with the US DC Court of Appeals decision in 2021 that the FCC's refusal to update their standards are "arbitrary and capricious" and that no federal agency has done a review of the harms of electromagnetic fields. The Court was particularly concerned with effects on children, and thus monitoring levels and requiring data centers to be placed a sufficient distance from schools and residential areas is essential.

I realize data centers are different from our usual topic of cell tower deployment; many of our members feel that the topic is sufficiently connected (since it relates to responsible technology infrastructure in the County) that we should bring it to your attention.

I concur that the following are missing from current proposals:

1. Data centers should be limited to heavy industrial zones
2. Data centers should be located at least 3 miles from residential areas
3. Data centers should not be connected to the public power grid and instead either generate their own electricity or have their own dedicated transmission lines ("bring your own generation," or BYOG) that are buried underground
4. *Data centers and their electric infrastructure should be constructed so as not to create elevated electromagnetic fields on other properties*

If the Council decides to pass Bill 4-26 alone, or in addition to the ZTA, I agree with the recommendation for the following amendments: 13 Amend Sec 8-58.a.1.C to add the bolded text as follows: potential environmental noise and electromagnetic impacts; and 10. Amend Sec 8-59.c.8 and 9 to allocate one representative each, from a civic association and an environmental group, appointed by the Council and one by the County Executive. 11. Amend Sec 8-60.a.3 to add the bolded text as follows: the potential environmental impact of data centers on air, water, the electromagnetic environment, and woodland quality and supply in the County, including recommended measures to mitigate negative impacts.

Thank you for your service, and your time and attention to this important matter,

Susan Labin, Ph.D.
Resident of Montgomery County