



CLIMATE COALITION
Montgomery County, MD

January 30, 2026

Dear County Executive Elrich,

We appreciate the opportunity to provide comments on the draft data center guidelines. As a threshold matter, there is strong consensus that the County implement a moratorium on all permitting of data centers until the zoning and operational mechanisms can be properly established. We request you to immediately announce an executive order for such a moratorium. Multiple Maryland counties have done this or are in the process. For example, the Frederick County Executive Order placed a six-month hold on *acceptance, consideration, and processing* of applications for critical digital infrastructure facilities, affecting applications already in process:

[Frederick County Executive Order for data center moratorium](#)

Prince Georgia's County imposed two moratoriums - one on new permits, and a second on preliminary plans:

[Prince George's County Council resolution for data center moratorium](#)

<https://www.princegeorgescountymd.gov/sites/default/files/media-document/EO%2042-2025%20Qualified%20Data%20Centers%20Task%20Force.pdf>

Carroll County Commissioners, on January 29, 2026, unanimously voted to approve a proposed deferral of the acceptance and review of applications for data processing centers in the County, to be scheduled for a public hearing:

[Carroll County proposed data center moratorium](#)

Beyond the request for an immediate data center moratorium, we provide below our thoughts on your proposed legislative and policy recommendations. They are identified as "Comments" under each section. Please note that several of our comments were informed by the Mobilize Frederick Data Center Sustainability Framework:

[Mobilize Frederick Data Center Sustainability Framework](#)

We look forward to further discussion to clarify our comments and recommendations, and assist in the development of regulations for data centers in Montgomery County.

Regards,

Caroline Taylor, Kevin Walton

Climate Coalition Montgomery County

Member organizations:

350 Montgomery County

ACQ Climate (Ask the Climate Question)
Bethesda Green
Biodiversity for a Livable Climate
Chesapeake Climate Action Network & CCAN Action Fund
Ecosystems Study Group
Elders Climate Action Maryland
Environmental Justice Ministry Cedar Lane Unitarian Universalist Church
Friends of Sligo Creek
Green Sanctuary Committee of the Unitarian-Universalist Church of Silver Spring
Montgomery Countryside Alliance
Montgomery County Faith Alliance for Climate Solutions
One Montgomery Green
Poolesville Green
Safe Healthy Playing Fields
Sugarloaf Citizens' Association
Transit Alternatives to Mid-County Highway Extended/M-83 (TAME)
The Climate Mobilization Montgomery County
Takoma Park Mobilization Environment Committee (TPMEC)
Zero Waste Montgomery County



CLIMATE COALITION Montgomery County, MD

Comments from the Climate Coalition Montgomery County Re:

Draft - Data Centers in Montgomery County County Executive Legislative and Policy Recommendations

1. Establish a data center overlay zone that requires clean energy and energy efficiency measures, such as:¹

- Maximize installation of solar arrays on site, including buildings, parking lots, and ground area, to offset some of the new demand on the electric grid and reduce on-site emissions.
- Require all data centers to meet their energy needs via at least 10% more clean energy as defined under the State’s Renewable Portfolio Standard (RPS), than the RPS clean energy requirement applicable to energy suppliers.
- Restrict the use of diesel backup generators to reduce or eliminate the pollution associated with diesel backup generators. If combustion generators are allowed, require decibel limitations, pollution capture technologies, and restricted hours for generator testing. Require use of EPA Tier IV generators for any diesel generators allowed.
- Require long duration energy storage so that diesel backup generators would not be needed for short duration outages.
- Monitor and report on energy efficiency and emissions data on a periodic basis (e.g., quarterly).
- Other zoning option:²
 - Establish a preferred data center location via zoning.

Comments:

1. We strongly support the proposed ZTA limits data centers to existing industrial zones. However, it opens up many locations in the county to by-right zoning for data centers.
2. Zoning for data centers should not be by-right, but require a review as a conditional use only.
3. Site suitability within the three industrial zones should be analyzed for:
 - Water and energy requirements. Frederick County, for example, requires data center sites to be within 2 miles of a 69kW line.
 - Other land use conflicts with residential areas and sensitive facilities such as schools, hospitals/healthcare facilities, and houses of worship.

¹ Sources: [Georgetown Climate Center](#), [Prince George’s County Qualified Data Center Taskforce](#), [Urban Land Institute](#)

² Source: [Urban Land Institute](#)

2. Require all data centers to undertake the conditional use process³

- This measure can prompt developers to respond to a more site- and application-specific review of potential impacts and mitigation strategies.

Comments:

Agreed. All data center proposals must utilize the conditional use process which evaluates the inherent and non-inherent effects of each project and provides for public participation.

3. Require a sustainable operations plan for conditional use approval.⁴

- An operational sustainability plan should include detailed strategies to regulate energy and water use, water discharge temperatures, integrate stormwater management, mitigate tree impacts, optimize utility infrastructure, and identify a program officer charged with the plan's administration and monitoring.

Comments:

1. Require a water use analysis, including impact of water when released, such as temperature and effects of added chemicals to the receiving waters.
2. Where applicable, submerged gravel wetlands should be constructed for cooling water discharge.
3. Prohibit the use of on-site groundwater or potable water for cooling purposes.
4. Require the use of gray water where feasible.
5. Prohibit open loop cooling water systems and require data centers to use advanced cooling techniques, e.g., liquid cooling, free air cooling, or geothermal systems.
6. Require limits on water use when there is a declared water shortage, and residential and commercial uses must be given priority access to water supplies.
7. Incentives/requirements should be considered for novel technologies that do not require water use or that utilize stored/recycled systems.

4. Amend the noise ordinance to regulate/take into account data center generators⁵

Relevant examples:

- Frederick County recommends creating a framework for testing, monitoring, and reporting on sound from data center sites. They suggest the framework should include:
 - Baseline testing to determine ambient sound levels prior to construction
 - Specified reporting intervals.
 - A process and procedures to require additional testing and reporting based on complaints.
 - Consideration should be given to the creation of a noise abatement fund
 - Sound levels at property boundaries should not exceed 55 dBA.

³ Source: [Prince George's County Qualified Data Center Taskforce](#)

⁴ Source: [Prince George's County Qualified Data Center Taskforce, Frederick County Data Center](#)

⁵ Source: [Prince George's County Qualified Data Center Taskforce, Frederick County Data Centers Workgroup](#)

- Sensitive facilities such as schools, healthcare facilities, houses of worship, etc. should be located in such a way as to minimize likelihood of data center sound traveling to those facilities.
- An overall approach to noise abatement should be required as part of planning applications.
- The County should plan for staff training or third-party verification to conduct sound monitoring efforts, especially for complaint investigations.
- Prince George's County recommends amending the noise ordinance to account for data centers and cites a model of ensuring compliance demonstrated in Loudoun and Fairfax Counties, which both now require a three-step process:
 - An existing noise survey
 - Modeling of new noise conditions
 - Testing of equipment once active

Comments:

1. Diesel generators are on ground level, but chillers and fans are on roofs. Trees will have little impact on elevated noise sources. Noise-producing equipment should be at ground level when possible or additional noise abatement should be installed (e.g., sound barriers).
2. Frequency of noise should also have requirements and be tested, as this has significant impact beyond decibels.
3. Define the response and enforcement mechanism if noise and/or frequency are beyond acceptable limits.
4. Vibration is a significant issue. Analysis should be conducted to gauge impacts on nearby properties.

5. Increase setbacks and screening requirements for data centers near residential areas⁶

- The County should require stronger screening and larger setbacks for data centers and equipment enclosures when they are located next to residential properties or neighborhoods. This should include enhanced natural buffers and noise mitigation that feature natural, four-season visual screening through tree and shrub planting or a combination of berms and vegetation.
- Frederick County suggests: Increase setback requirements to 100 feet, or double building height, whichever is greater.
- Prince George's County suggests:
 - Increasing their current setback distance (300 feet from any residential use distance) to 400 feet, this could be reduced to a minimum of 300 feet if certain performance criteria are incorporated into the site design like:
 - Siting the primary data center building between the residential use and the data center's equipment and mechanical enclosure to mitigate potential noise concerns.
 - Providing enhanced natural buffers that feature natural, four- season visual screening through tree and shrub planting or a combination of berms and vegetation.

Comments:

1. There should be a complete ban on data centers near residential tracts and sensitive areas like houses of worship, hospitals, and schools.
2. Setback should be at least 500 feet, though other jurisdictions are looking at larger setbacks.
3. The Planning Board should be allowed to increase the setback based on site.
4. Prohibit any reduction in the setback.

6. Require data centers to “Bring Your Own Generation” (BYOG) and maximize clean energy

- Require data centers to supply 100% (or a high % like 80–100%) of annual electricity demand from on-site generation or contracted, dedicated off-site resources.
- Requirements should maximize the use of clean energy for this generation and clean energy should be defined consistent with Eligible Renewable Sources under the State’s Renewable Portfolio Standard.

Comments:

1. Require purchase of Renewable Energy Credits (RECs) and/or power purchase agreements for energy from renewable sources. These purchases must be made within the PJM territory and must be from renewable sources that are less than two years old.
2. Require data centers to have a primary backup of 50 hours of load shifting capacity not reliant on back-up diesel or gas generators. The 50-hour capacity could be onsite battery storage, paying for residential battery storage to aggregate demand, or another approach.
3. Diesel back-up should be secondary. Require type 4 generators or emissions equivalent.
4. Facilities should be planned, constructed, and operated in accordance with energy and environmental sustainability plans that reflect best-in-class industry practices, and certified in compliance with LEED BD+C and O&M Gold, or Green Globes Level 3 standards.
5. Explore ISO 14001 certification which we understand has emerged as a top option to help the industry better manage their carbon footprint.
6. Data center owners/operators should be required to develop a plan to achieve net zero greenhouse gas emission by 2035, aligning with the Climate Action Plan.
7. Applicants should be required to deploy battery energy storage systems or solar with battery storage for backup power within 5 years following site plan approval.

7. Adopt green design standards for data centers

- Varying design standards can create more variety in buildings and sites, as opposed to the typical formulaic appearance of data centers. Through the conditional use process, this could allow public input and give developers flexibility.
- In Prince George’s County green design policy recommendations were to:
 - Amend the County landscape manual to introduce specific landscape standards for data center sites (including Rural and Agricultural Zones) focused particularly on creating natural, vegetated buffers through plantings and the use of green walls, roofs, and other natural screening strategies in the site design.

- Amend the zoning ordinance to allow flexibility on the maximum building height when additional height is required to accommodate energy efficient cooling and energy generation infrastructure.
- Adopt less prescriptive architectural and landscape design guidelines (e.g., leveraging ratios and percentages rather than explicit numbers) to produce more diverse building and site design outcomes.

Comments:

1. Conduct viewshed analysis.
2. Facilities without roof top solar arrays should be equipped with either cool or green roofs.
3. Pervious surfaces at data center facilities should be maximized. Stormwater runoff should be captured in retention and treatment best practices. Final discharge must be through infrastructure equipped with diffusers.
4. Require native plant landscapes that are designed for maximum water quality benefits (e.g., to ensure water percolation and retention, maximize efficiency of outdoor water use, and reduce pesticide use).
5. Where applicable, submerged gravel wetlands should be constructed for cooling water discharge.
6. Escrow accounts, security deposits, or bonds should be required to fund any needed soil or groundwater cleanup of spilled hazardous waste and the repair or replacement of impacted private wells, lost riparian buffers for perennial and intermittent streams, or floodplains damaged by stormwater runoff or discharges from the data center.

8. Tighten data center restrictions in non-industrial zones and restrict data center development in designated areas that are environmentally sensitive⁶

- Explicitly limit data centers outside industrial zones.
- Identify environmentally sensitive areas to protect from data center development.
- Restrict data centers in designated cold and cool watersheds due to high water temperature discharge concerns.

Comments:

1. New Data Centers should be confined to the three existing industrial zones with no expansion. Data centers should be prohibited elsewhere in the county.
2. Industrial zones need further analysis to remove from data center eligibility any that are unsuitable due to adjacent land uses or limited access to electricity and water.
3. A minimum size, based on energy use and/or physical area, should be defined for data centers to be covered by legislation. Small, local data centers, such as those associated with hospitals or other localized data intensive activities, should not be included.

Additional Comments:

1. Siting should avoid underserved/overburdened communities
2. Require a defined health impact analysis as in Prince George’s County
3. Require bonding and decommissioning provisions
4. Prohibit non-disclosure agreements that inhibit review of applicants’ energy and water consumption.

⁶Source: [Prince George’s County Qualified Data Center Taskforce; Data Centers and Water Article](#)