

Date: February 24, 2026

To: Montgomery County Council President and Councilmembers

From: Roberta G (rg) Steinman

Subject: Testimony on **Bill 4-26**, Buildings - Task Force on Data Centers and **Zoning Text Amendment (ZTA) 26-01**, Commercial Uses - Data Center

Dear Council President and Council Members,

It is **premature to consider ZTA 26-01** prior to the findings of a Task Force, as specified in **Bill 4-26**. At this time, voting on, or even considering, ZTA 26-01 would be putting the cart before the horse. Critical data center impacts on the environment, the community and the built infrastructure need to be clearly understood and resolved before Montgomery County approves any data centers.

At this time, we need a **MORATORIUM on permitting any large (hyper-scale) or medium-sized data centers** in Montgomery County, pending the development of a regulatory framework that will protect our forests, farmlands, waters, air, residential communities, and curb the rising utility rates. A Moratorium makes a lot of sense as data centers come with so many issues that concern the well-being of all. The County Executives in both Frederick and Prince George's Counties issued temporary holds on data centers. There are also ongoing discussions regarding a state-level moratorium on the construction of new data centers in Maryland, pending a Maryland General Assembly study.

The following are some of the key issues and concerns that need to be addressed in a regulatory framework prior to consideration of any data center ZTAs:

1. DEFINITION OF DATA CENTER: Clarify the **definition, size, and purpose of a data center** that would be subject to County regulations. Are we talking about (a) smaller data centers mainly used for research computing and networking purposes, or (b) bigger enterprise data centers, owned by single, large companies for their exclusive use, or (c) massive hyperscale data centers that facilitate large-scale cloud computing, such as Google, Meta, Microsoft, and Amazon Web Services?

Points 2 through 6 are most relevant to larger data centers.

2. SITING: Whatever their size, data centers need to be kept out of forests, fields, and the agricultural reserve, and away from aquifers. If data centers are to be built, they **need to be sited in areas that are zoned heavy industrial and already have high voltage lines.**

3. ENERGY EFFICIENCY REGULATION: Data centers are energy-intensive on a scale we have not seen before, upending years of energy efficiency progress and generating higher carbon emissions. **Building large data centers will severely undermine our climate goals if left unregulated.** We need **energy efficiency regulations** that will require data centers to power these facilities so as to reduce energy consumption and carbon emissions overall and decrease their need to use carbon-intensive diesel generators as backup. Otherwise, we will most certainly not achieve Montgomery County's emission goals as laid out in the Climate Action Plan.

4. WATER USE AND CONTAMINANTS: **Data centers consume very large quantities of water, and this threatens our water supply in many ways.** (a) Already **ongoing droughts** are leading to water shortages and/or reduced availability of piped water, surface water and underground aquifers, and more droughts are predicted. (b) Water used in data center cooling systems, whether open- or closed-loop systems, can become **contaminated with various toxins** that are harmful to the environment when discharged. (c) Data centers discharge water at high temperatures resulting in **thermal pollution**, which harms local aquatic ecosystems. (d) The **cumulative impact on the water supply** of many data centers operating

simultaneously is enormous. For example, a significant portion of the 250 data centers operating in Northern Virginia are drawing water from the Potomac River basin, directly competing with residential and agricultural water needs. This is putting immense pressure on regional water supplies and increasing risks of shortages. And **50 to 80% of the water withdrawn by data centers for cooling purposes is consumed through evaporation** and thus not returned to the surface water source.

Data centers use of raw water from rivers and streams must be strictly regulated and proscribed in times of severe drought. Use of potable water for cooling purposes should not be permitted. (As of late January 2026, Montgomery County is experiencing significant drought conditions following one of the driest years on record for the state). **Under no circumstances should data centers be permitted to use ground water aquifers.**

5. AIR POLLUTION: Data centers emit pollutants that degrade air quality, contribute to climate change, and pose serious health risks to nearby communities. (a) Data center generators emit significant amounts of particulate matter (PM), nitrogen oxides (NOx), sulfur dioxide (SO₂), and carbon dioxide (CO₂). (b) The majority of electricity consumed by data centers comes from fossil-fuel power plants that release significant amounts of carbon dioxide (CO₂) and other greenhouse gases into the atmosphere, contributing to global warming and climate change. (c) Communities living close to data centers face heightened air pollution, which can result in significant respiratory-related health consequences. **Regulations need to include pollution-free energy sources and health-informed siting decisions.**

6. HOUSEHOLDS SHOULD NOT SUBSIDIZE DATA CENTER EXPANSION: Who pays for the massive power and water needs? AI and high-tech corporations are driving data center expansion in our region, and the higher energy demands of regional data centers are driving increased infrastructure investment – this is one of the key factors that has led to rising electricity rates. **Rather than shifting the financial burden on residential users, corporate owners should bear 100% of the costs of the new generation they require.**

Montgomery County needs to enact a moratorium on all data center projects until we develop a regulatory framework that will protect our forests, farmlands, waters, air, communities, and curb the rising utility rates. Wisdom and restraint are required if we are to live well in our communities and care for each other and the land, water, and air that are the foundation of life for us and all the other species we live with in this shared space.

RG Steinman