



FREDERICK COUNTY GOVERNMENT

DIVISION OF ENERGY & ENVIRONMENT

Jessica Fitzwater
County Executive

Shannon Moore, Director

October 13, 2023

Mark Stewart
Climate Change Program Manager
Maryland Department of the Environment
1800 Washington Boulevard
Baltimore, MD 21230

Re: Comments about Maryland's Climate Pathway Report

Dear Mr. Stewart:

This letter is in support of the State's efforts to reduce greenhouse gas emissions by 60% in 2031. Frederick County is a partner in these efforts as sustainability is a key pillar for our County Executive. As a partner, we help to implement the State's plan. In return, we need State support through consistent engagement, funding, and technical assistance so we can do our part.

I would like to highlight issues for consideration in developing the State's plan.

As the data center industry is beginning to develop in Frederick County, it is important that the State be prepared for a corresponding increase in energy usage, which will in turn increase greenhouse gas (GHG) emissions. This will impact both Frederick County and the State in meeting climate goals. While the presence of this industry in Maryland may offer many economic benefits, the State should be prepared to work in tandem with Frederick County and other partners to ensure these benefits are effectively utilized to mitigate challenges, such as increased energy use.

In addition, as part of the Building Energy Performance Standards (BEPS) established by the Climate Solutions Now Act (CSNA) of 2022, rather than energy use intensity (EUI), the proposed standard for data centers would better utilize power usage effectiveness (PUE). This is the basis of the ENERGY STAR performance scale for data centers in Portfolio Manager. It is important to ensure that building energy standards are appropriate for the industry. It is imperative that the structure of the BEPS program be as user-friendly as possible to allow for smooth implementation and widespread compliance. If building owners are clear on expectations and pathways to meet the State's goals, the program will have a better chance of being effective and successful.

Another issue related to BEPs is that many buildings owned by local governments will not be able to meet BEPS requirements without significant retrofits. This requires County governments to weigh significant trade-offs. For example, the County recently purchased a 200,000 square foot facility with plans for its adaptive re-use. On one hand, the County is designing a microgrid with solar power backup and a resiliency hub for this property. On the other hand, the property is heated with gas boilers. It will be very expensive, if not impossible, to meet the current BEPS standards for this building.

While we commend the State's efforts through BEPS to address GHG emissions and improve overall energy efficiency from Maryland's building sector for buildings, the State should support local governments in its implementation, especially for large buildings such as the one mentioned above. The State could provide financial assistance for major retrofits and technical assistance for leveraging Federal funds to offset the costs. It could allow for offsets through virtual net metering.

On another topic, we support a State Climate Plan that invests in equitable access and affordability of energy reduction improvements for underserved and overburdened communities. To be successful with engagement with underserved and overburdened communities, it will take more than public education campaigns. It will take trusted partnerships and input from the local level to create the level of engagement needed to meet goals.

As the electrification of our building sector moves forward, we must be conscious of the impact it will have on residents currently using fossil fuels in their homes. As the customer base for gas utilities shrinks, remaining customers will feel a heavier financial burden for the infrastructure needed to deliver gas. Without intentional policy solutions, this will leave the customers least able to pay for rising energy costs or retrofit their homes to be footing the bill for gas infrastructure.

Agriculture is important to Frederick County. We commend the inclusion of Frederick County's Fox Haven Farm as a model of how industry and community leaders can make a substantial impact in reducing emissions. More work should be done to develop programs that incentivize agricultural innovation and sustainable practices. This includes agrivoltaics.

As a County that values land preservation and our agricultural assets, we also urge the Climate Plan to embrace solar co-siting and co-adoption where possible to ensure our more productive land can continue to be preserved. Deployment of solar is a crucial component to reaching our clean energy goals. More investment should be made in identifying land most suitable for solar deployment and then partnering with the local government and community to properly site and build projects. Frederick County is soon to embark on a county-wide solar siting study to meet the population-based share of the state's renewable energy portfolio that will include robust community engagement and build consensus on the placement of solar that is most consistent with our livability goals.

Frederick County is supportive of the goals of the State. We view this as an "all hands on deck" endeavor in which all sectors need to be involved. This includes working with local, state, and federal partners. Please continue to work closely with local governments in the development and implementation of the State's Climate Plan. I welcome you to reach out in partnership with these bold and necessary goals.

Sincerely,

A handwritten signature in black ink, appearing to read 'S. Moore', written in a cursive style.

Shannon Moore
Director, Frederick County Division of Energy and Environment