



The Mount Vernon Council of Citizens Associations, Inc.
P.O. Box 203, Mount Vernon, VA 22121-9998 <http://www.mvcca.org>

November 21, 2025

Tamera Thompson
Department of Environmental Quality(DEQ)
Commonwealth of Virginia

Re: Attached Resolution ER 2025-8 on DEQ Guidance Memo APG-578

Dear Ms. Thompson,

The Mount Vernon Council of Citizens Associations (MVCCA) is an organization of over 30 homeowner associations located in the Mount Vernon Magisterial District of Fairfax County.

Data center generator noise is a concern to our community and we expect more data centers to be sited in Fairfax County.

Since technology exists to reduce noise and resultant impact on the community, the attached resolution does not support adoption of the proposed relaxation for the operation of Tier 2 generators in Guidance Memo APG-578. See: <https://townhall.virginia.gov/L/GDocForum.cfm?GDocForumID=2798>.

Thank you for your attention and consideration of our comments. We welcome any questions.

Sincerely,

Mount Vernon Council of Citizens Associations

By /s/ *Judith F. Harbeck*

Judith F. Harbeck, Co-chair

Cc: Clerk to the Fairfax County Board of Supervisors, Sen. Scott Surovell, Del. Paul Krizak, Carmen Bishop (Deputy Zoning Administrator, Fairfax County)

MOUNT VERNON COUNCIL OF CITIZENS' ASSOCIATIONS (MVCCA) ENVIRONMENT AND RECREATION COMMITTEE RESOLUTION ON DEQ GUIDANCE MEMO APG-578 (MVCCA E&R 2025 08)

WHEREAS, the Mount Vernon Council of Citizens' Associations (MVCCA) recognizes that more data centers are likely to be sited in the county because they can be a significant source of tax revenue;

WHEREAS, the Virginia Department of Environmental Quality has [proposed](#) to eliminate the requirement to employ Tier 4 generators when there is less than a 14-day notice of a planned interruption to the power grid;

WHEREAS, Tier 2 generators provide significantly more noise (about 20 dB), over 90 percent more toxic emissions, and more greenhouse gas (GHG) emissions than Tier 4 generators;

WHEREAS, redundant electrical lines from different sources and Battery Energy Storage Systems can be used during power outages, and this policy change would discourage seeking these alternatives; and

WHEREAS, the operation of Tier 2 generators during an emergency will be exempt from noise and pollution limitations.

THEREFORE, BE IT RESOLVED that there are many neighbors near data centers that would experience more noise and pollution as a result of this proposal; and

BE IT FINALLY RESOLVED THAT the MVCCA recommends against the adoption of this policy change because it would unnecessarily increase noise, pollution, and GHG emissions.