

Dear Members of the Citizens Advisory Council and DEP Representatives:

My name is Linda Van Eman, and I am a fifth-generation resident of Mahoning Township in Lawrence County. I am writing on behalf of residents confronting a proposed approximately 500- to 600-acre data center campus involving Mahoning and North Beaver townships.

Our experience demonstrates why Executive Order 2026-05 is necessary—but also why its implementation details matter. Community and environmental protections must become enforceable approval standards, not simply commitments developers can choose whether to make. Equivalent protections should apply to developers proceeding without a GRID consent agreement. I would also ask member to consider which of these or any additional regulations could be considered without legislative action to best protect the health and environment of Pennsylvanians.

I ask the Council and DEP to address the following:

1. Define “local approval.” The filing of an application—including an incomplete or contested application—should not be treated as approval. DEP should clearly explain what documentation establishes local approval and how unresolved appeals are handled, while respecting protective ordinances adopted through a legitimate public process. Community health and environmental protection must take priority over a developer’s financial interests.
2. Prevent project segmentation. Evaluate the combined impacts of all data-center buildings, utilities, substations, generators, associated gas plants, pipelines, access roads and construction phases. Separate ownership entities, municipal boundaries or permit applications should not obscure the full environmental footprint.
3. Require proof that the project is real. Developers should disclose site control, financing, the intended end user, projected electrical demand, construction schedule, cooling design and power arrangements before DEP invests substantial resources in permit review. Missing or uncertain information should be clearly identified.
4. Require baseline and continuing monitoring. Require independent, developer-funded monitoring of private wells, groundwater levels, streamflow, wetlands, air quality, noise and vibration before construction and throughout development and operation. Results should be publicly available, with clear thresholds requiring corrective action.
5. Address construction dewatering as well as operational water requirements. Closed-loop cooling does not answer questions about excavation, groundwater pumping, changes in drainage or impacts on neighboring wells, lakes, streams and

agricultural ponds. Require a complete water assessment covering construction, operation and drought conditions.

6. Address legacy contamination. The Powder Mill Works property's history of explosives manufacturing makes soil disturbance, groundwater movement and contaminated-material handling especially important. Require adequate investigation and protective measures before clearing, excavation or dewatering begins.
7. Distinguish heavily developed brownfields from former industrial land that has naturally regenerated. A brownfield designation should not erase the present ecological value of mature forests, wetlands, streamside buffers and wildlife habitat. Prioritize suitable, already paved or heavily disturbed sites over areas where nature has reclaimed the landscape. Evaluate current conditions and habitat value, not just past industrial use.
8. Evaluate cumulative air pollution and environmental-justice concerns. Our area already hosts the approximately 1-gigawatt Hickory Run gas power plant and faces proposals for a large data center and another approximately 1.5-gigawatt gas plant nearby. DEP should use PennEnviroScreen and available local health and environmental data to assess existing burdens and the additional exposure these projects could create together. I am attaching air-pollution modeling prepared for our community concerning the proposed data center alone. Please evaluate its findings and assumptions alongside existing and other proposed emission sources, rather than treating it as a complete picture of the cumulative burden.
9. Protect agriculture and our food supply. Evaluate potential pollution deposition and contamination of crops, soil and agricultural water supplies. Assess whether waste heat, extensive paving and vegetation loss could alter surrounding temperatures, evaporation, soil moisture, crop maturity or yields. These questions require site-specific investigation before surrounding farms bear the consequences.
10. Require enforceable diesel-generator limits. Require developers to disclose the number and capacity of generators, emissions, testing schedules, emergency-operation provisions and fuel-storage plans. Evaluate simultaneous operation across the campus and nearby facilities, with enforceable operating limits, emissions controls and public reporting.
11. Make the permit tracker genuinely searchable. Connect developers, LLCs, property owners, consultants, associated power-generation entities and every related permit under one project record. Residents should not have to discover a development's full scope by tracing unfamiliar company names across separate databases.
12. Guarantee early notice and accessible information. Municipalities and nearby residents should receive notice when DEP first learns of a proposal—not only when

a technically complete permit application is published. Applications, supporting studies, deadlines and decisions should be easy to find and understand, with meaningful opportunities to comment before decisions are made.

13. Require financial security. Developers should provide bonding or other enforceable financial assurance for water-supply replacement, environmental remediation, abandoned construction, decommissioning and restoration. These protections must remain effective if a project is sold, transferred to another LLC or becomes insolvent.

We are asking DEP to evaluate what these developments mean for the communities already here—not simply whether each individual permit meets a minimum requirement. Our homes, farms, water supplies and wildlife experience the combined impacts, regardless of how applications are divided.

Sincerely,

Linda Van Eman

Mahoning Township, Lawrence County