Comment by Malia wortman, York

Re: Docket No. M-2025-3054271

I oppose the siting/expansion of data centers in Manchester without comprehensive, independent investigations into their environmental, land-use, public health, economic, and infrastructure impacts. I request the township require the developer and permitting agencies to fund independent baseline studies, a cumulative impacts assessment, and long-term monitoring before any approval. Please withhold approvals until the investigations are completed, publicly reviewed, and enforceable mitigation measures are adopted.

I support the following statement from the Better Path Coalition and No False Climate Solutions PA. “The problems being addressed in PUC’s tentative order are largely manufactured ones resulting from the state’s rush to get into the data center business before the boom goes bust. As is too often the case, the public is only engaged after the big decisions are made. Our first opportunity to comment comes when the only things left to decide are how to deal with the new project/business/industry. At that point, advancement of the thing under consideration is taken to be an inevitability when it really isn’t. Therefore, we feel it is important to state up front that we oppose the approval of hyperscale data centers in Pennsylvania based on many well-documented concerns about their environmental, health, safety, climate, quality of life, economic, and ethical impacts that scattershot regulations across agencies, in this case tariffs, cannot address. Our regulatory agencies should be our advocates, using their expertise to stop the state from creating preventable problems rather than resigning themselves to managing them.”

I am a resident of Manchester, PA, and I oppose approval of any proposed data center projects in our area until the following investigations, baseline studies, and enforceable conditions have been completed, made public, and subject to independent peer review.

Required baseline studies and investigations (before any approval):

Land use & zoning analysis

Confirm consistency with the municipal comprehensive plan and zoning.

Analyze loss of productive farmland, prime soils, and open space; acreage permanently converted to impervious surfaces.

Evaluate alternatives (brownfield sites, re-use of industrial land, sites outside residential or agricultural areas).

Cumulative impacts assessment

Model combined effects of this and any existing/proposed facilities (impervious cover, traffic, noise, light, water use, air emissions, visual impacts).

Use at least a 5–10 year planning horizon and assess regional scale (neighboring townships).

Hydrology and water resources

Baseline groundwater and surface water quality testing (pre-construction).

Quantify projected water withdrawals (peak and average) and source (municipal supply vs. groundwater).

Stormwater management plan showing pre/post runoff volumes, demonstration of no off-site flooding increase, and maintenance/inspection schedule.

Impacts to nearby wetlands, streams, riparian zones, and required buffers.

Soils and erosion

Soil survey, erosion & sediment control plan for construction and long-term.

Assessment of risks to septic systems and agricultural drainage infrastructure.

Air quality & emissions

Inventory of air emissions (including backup diesel/GT generators, fuel storage, fugitive dust during construction).

Modeling of worst-case generator emissions (NOx, PM2.5, SO2) and potential impacts on nearby residences, schools, and sensitive populations.

Plan to minimize emissions and fuel spill prevention.

Noise and vibration

Baseline ambient noise survey at representative receptor points (day/night).

Projected operational noise (HVAC, generators, transformers) with worst-case scenarios and a mitigation plan to meet health-based standards.

Light pollution and nighttime impacts

Lighting plan showing fixtures, hours, shielding, and measurements of expected light spill at property lines and residences.

Traffic, roads & transportation

Construction and operational traffic analysis (truck trips, worker shifts).

Assessment of wear/tear and safety impacts to local roads; developer-funded road improvements and bonding for repairs.

Energy & electrical system impacts

Projected electrical demand and expected grid upgrades; impacts on local rates and reliability.

Source of electricity (utility, on-site generation) and any proposed long-term battery storage or fuel storage plans.

Public health impact assessment

Analysis of health risks from emissions, noise, light, and water contamination—especially for sensitive groups (children, elderly).

Economic and property impacts

Analysis of property-value impacts on neighboring residential and agricultural properties and assessment of job creation vs. costs to municipal services.

Transparent tax/revenue projections, including temporary vs. long-term revenue and any tax abatements.

Emergency services & safety

Evaluation of impacts on fire, EMS, police, and municipal emergency plans; required upgrades and associated costs.

Decommissioning and reclamation

Binding plan and financial assurance (bond or escrow) for site decommissioning, hazardous-material removal, and long-term site restoration if the facility ceases operation.

Environmental justice & community input

Map and analyze whether vulnerable populations are disproportionately affected.

Funded, independent translation/outreach and multiple accessible public comment hearings.

Electricity generation is not regulated in Pennsylvania, so the tariff only pertains to distribution costs. If approved, the tariff would not protect the public from generation costs which account for roughly 45% of consumer energy bills. Carnegie Mellon and its research

partners projected that electricity generation costs will increase by as much as 25% by 2030.

Carnegie Mellon and its research partners say that already “Virginia's data center growth drives increased fossil fuel use in nearby states like Ohio, Pennsylvania, and West Virginia, potentially undermining state and regional climate goals.”, Natural gas would be used to power data centers. Methane leaks occurring at every step of natural gas production, transmission, and distribution exacerbate climate change. Hundreds of thousands of legacy wells leaking methane unchecked further add to the state’s contribution to the climate crisis. Continued and even increased natural gas production to power data centers is unacceptable.

Throughout the discussion of the tentative order, the PUC’s disposition fell short of imposing the most stringent requirements on large load customers. Therefore, the tentative order is weak and inadequate., PUC’s order requires Large Load Customers to contribute to the utility’s hardship fund, but provides no relief for residential customers ; this is unfair, especially given the stunning figure cited by Commissioner Barrow that, according to U.S. Census Bureau data, “nearly a quarter of all Pennsylvanians have been unable to pay an energy bill in full in the last 12 months.” The fact that there is no agreement on contributions to the hardship fund among all of the commissioners is extremely concerning., The reporting requirements are out of step with the state’s efforts to fast-track data center approvals. The tentative order states that compliance reports must be filed on an annual basis by the end of the first quarter of the following year. Compliance data should be available on a real-time basis so that pertinent information is accessible as future data centers are fast-tracked.

No approvals until the above investigations are completed, publicly reviewed, and adequate, enforceable mitigation and financing are in place to protect Manchester residents, land, water, and municipal services.