



NEW JERSEY ENVIRONMENTAL JUSTICE ALLIANCE

January 2026

To: Council President Spinelli and Members of the Vineland City Council

CC: City of Vineland Planning Board

Vineland City Council

640 East Wood St

Vineland, NJ 08362-1508

Re: Opposition to Project PBA-24-00022 (DataOne/Nebius/NEP Data Center)

Dear Council President Spinelli and Members of the council,

On behalf of the environmental justice communities that we serve and support, including the residents of Vineland, the New Jersey Environmental Justice Alliance respectfully submits this letter to urge the Planning Board and City of Vineland City Council to withdraw all approvals for Project PBA-24-00022 its current form such that a comprehensive, independent environmental review can be completed before any further action is taken. The project's proposed 300-megawatt hyperscale data center would impose severe, cumulative harms on an already overburdened area.¹ Furthermore, the Planning Board's June 26, 2024, approval was granted with little over a week's notice of the meeting and did not grant sufficient time for community members to review the proposal and provide input on the project.

As such, we write this letter to bring to your attention several concerns we have regarding this project and to reiterate our support for the residents of Vineland who wish to seek this project halted so that a thorough analysis can be completed. This will give residents a holistic

¹ While the facility will not operate in a designated OBC, Block Group 340110410012 sits geographically closest to the proposed DataOne/Nebius center.

understanding of how the project will impact their community - perhaps both positively and negatively - and ensure that a more community-centric process is utilized in this project's development.

Air Emissions and Local Public Health Risk

Project PBA-24-00022's application indicates that the facility will rely on "behind-the-meter" power generation, with news reports indicating that natural-gas and diesel backup generators will supply the majority of the 300 MW load. Operation of these fossil-fuel generators would emit nitrogen oxides, carbon monoxide, volatile organic compounds, and fine particulate matter, creating a constant source of air pollution which leads to an exacerbated risk of asthma, cardiovascular disease, and other health conditions linked to poor air quality.^{2, 3, 4} The American Lung Association's State of the Air report assigns Cumberland County a D-grade for particulate matter, indicating that local particulate matter concentrations already exceed standards.⁵ Vineland itself is classified as a "moderate-risk" community for air quality, a contributing factor of that risk being power generation.⁶ Adding a 300-MW data center has the potential to increase and worsen the negative health impacts that the Vineland community currently endures. The Vineland Environmental Commission's technical comments specifically note that data centers are "quite noisy" and operate 24 hours a day. However, yet the Board's meeting minutes do not reflect any discussion regarding emissions, noise thresholds, or required mitigation measures.

Water Usage, Stormwater Risks, and Wetland Damage

Furthermore, water usage and stormwater management present additional, unaddressed risks. Project PBA-24-00022 describes a "hybrid air cooling system with a water component and a loop system" that allegedly has "no discharge into the municipal sanitary sewer," while simultaneously stating that "water that is blown out goes into the sewer system."⁷ No quantitative estimate of total water draw or blow-down volume was provided. This could be potentially risky for the City of Vineland as it might impede Vineland's ongoing water-conservation measures and exacerbate previous groundwater contamination. The

² Specht, Mark. "No, Natural Gas Power Plants Are Not Clean." *The Equation*, 9 Nov. 2018, blog.ucs.org/mark-specht/natural-gas-power-plants-are-not-clean/.

³ Environmental Defense Fund. "Environmental Defense Fund, Clearing the Air." *Edf.org*, 2025, turbinemap.edf.org/.

⁴ Han, Yuelin, et al. "The Unpaid Toll: Quantifying the Public Health Impact of AI." *ArXiv.org*, 2024, arxiv.org/abs/2412.06288.

⁵ American Lung Association. "New Jersey | State of the Air." *Lung.org*, 2025, www.lung.org/research/sota/city-rankings/states/new-jersey/cumberland.

⁶ First Street. "Vineland, NJ Poor Air Quality Map and Forecast." *Firststreet.org*, 2024, firststreet.org/city/vineland-nj/3476070_fsid/air.

⁷ Casadia, John, et al. *SPECIAL PLANNING BOARD MINUTES*. 2024.

Environmental Commission comments stated that the applicant has not demonstrated a closed-loop water system, that being, a closed system enabled to reuse both recycled wastewater and freshwater, allowing water supplies to be used multiple times. The applicant may rely on potable water instead for cooling “which is”, an unsustainable practice in a region already experiencing low water pressure.

Moreover, the stormwater plan is presented only as more efficient and of better design, yet it is without any publicly shared calculations regarding peak runoff rates, time of concentration, surface storage, no predications on storm events, nor any hydrologic or hydraulic analysis. Additionally, the applicant has been granted numerous waivers by the planning Board to the city’s Stormwater Control Ordinance which allows reduced setbacks, elimination of required side slopes, and removal of access drives for bio-retention basins. In doing so, these stormwater plan waivers undermine the protective intent of state stormwater standards and increase the likelihood that runoff containing pollutants from generators will reach nearby wetlands and groundwater, thereby presenting further risk and harm to the surrounding community.

In line with our concern for the surrounding community, enforcement records show that the parcel of land which Project PBA-24-00022 seeks to build on has been cited for unauthorized clearing and filling of approximately 1.08 acres of freshwater wetland, and an additional 3.97 acres of wetland transition area; these, violations cited under N.J.A.C. 7:7A-2.2(a) and 7:7A-3. Proceeding with a project that will further disturb these wetlands would compound ecological damage and expose the city to additional liability for non-compliance with state wetland protection statutes.

Transmission and Electrical Load

The feasibility-study agreement between the City of Vineland, Atlantic City Electric (ACE), and Northeast Precast/NEP Real Estate has not made clear, if the proposed data center will require substantial upgrades to local electric transmission capacity in order to support its 300 MW load. Although ACE has agreed to conduct a preliminary study, there has been no mention in this agreement to require an independent Energy Impact Statement. That being an analysis that quantifies a project’s electricity demand, the emissions from any on-site generation, and the cumulative effects on regional grid reliability and local air quality for large-scale energy intensive projects, such as utility transmission upgrades, industrial facilities, and data centers. Energy Impact Statements are crucial because they deliver an independent, data-driven assessment of a project’s electricity demand, emissions, and grid effects, ensuring that any upgrades or on-site generation meet standards before permits are granted. Without an Energy Impact Statement, communities cannot verify whether proposed developments will overload the local grid, worsen air quality or create undue noise.

Prior to any approval for permitting granted to Project PBA-24-00022, a comprehensive environmental review, should have been conducted which would have included air-quality modeling, greenhouse-gas accounting, and assessment of cumulative impacts on regional grid reliability. In order to best protect the community - both from a local air pollution and health perspective as well as a grid capacity and energy production standpoint - a comprehensive environmental review must be completed by an independent third party before any transmission upgrades or on-site fossil-fuel generation can proceed. The absence of such a study constitutes a procedural deficiency that leaves Vineland exposed to unvetted emissions, noise, and reliability risks associated with the data center's energy supply strategy.

Taken together, the deficiencies in the permitting process, continuous high-intensity noise, unquantified water consumption, unchecked emissions, inadequate stormwater controls, cited wetland violations, and the lack of an Energy Impact Statement, pose an unprecedented threat to public health, environmental quality, and climate-justice commitments in Vineland. While this facility is not subject to the Environmental Justice Law at this time, the State of New Jersey has made clear its commitment to the principles of environmental justice and robust review, and therefore, the Board's rapid approval without substantive scrutiny contravenes the state's stated commitments to the principles of environmental justice and protection of overburdened communities, including engaging in meaningful community participation and cumulative impact analysis for projects that disproportionately affect environmental justice communities.

In light of these facts, we - in support of Sustain South Jersey, and local residents, respectfully request that the Vineland Planning Board/Council:

1. Immediately suspend all permits and approvals for Project PBA-24-00022 pending a full, independent Environmental Impact Statement that addresses air quality, water use, stormwater management, noise, wetland impacts, grid strain, and electronic waste handling;
2. Require Project PBA-24-00022 to submit a detailed engineering design demonstrating zero-emission on-site power generation - specifically solar photovoltaic with battery storage as we believe this to be most physically and financially feasible for all parties while yielding the greatest benefit -, continuous stack monitoring, and a binding emissions cap.
3. Obligate the developer to provide a closed-loop water-recycling cooling system design with verified maximum draw rates and documented blow-down reduction strategies, confirming that no potable water will be consumed;
4. Conduct a comprehensive noise impact analysis that includes continuous operational sound levels, night-time thresholds, and mitigation measures such as acoustic enclosures or alternative equipment placement;

5. Partner with Vineland residents to update the Vineland City Master Plan to create a definition of “AI data centers” and “hyperscale data centers” in the City Master Plan and embed enforceable zoning rules, including: a community-driven safeguards of energy, water, noise and waste impacts, a specific land-use designation (e.g., “Restricted Industrial – AI Data Center”) that confines siting to suitable infrastructure-ready sites away from vulnerable neighborhoods, and collaboration with NJ Office of Planning Advocacy.
6. Provide full public disclosure of all technical documents, ensure translation services for non-English speakers, and hold a new public hearing with at least thirty days’ notice prior to the hearing as well as 90 day public written comment period after the public hearing to allow affected residents to review, comment, and engage with experts on the Environmental Impact Statement and mitigation plans.

We stand ready to work collaboratively with the City of Vineland Planning Board, NJDEP, and other regulatory agencies to ensure that any development in Vineland meets the highest standards of environmental protection and social equity. Until these conditions are satisfied, we urge you to halt construction, rescind the approval, and reopen the process to genuine community participation.

We urge you to reflect on their decision and what kind of legacy they want to leave behind. As public servants, it is incumbent upon you to prioritize the community, their health, and the local environment in your decision-making processes.

Signed:

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