



An Open Letter to New Jersey Officials – Environmental Justice Means Saying No To Dirty Data-Centers

An Appeal to Protect The Garden State’s Climate, Water, Energy, and Environmental Future

As New Jersey’s first - and still only - statewide environmental justice organization, we write to urge you to consider the lasting legacy you wish to leave behind. In a time when AI and data centers are seen as a beacon for a richer, more techno-focused economic future, we pen this letter to spotlight the environmental and economic risks that hyperscale data centers bring to our communities.

We urge you to consider *more* than a promised economic benefit, and to consider the potential harms to communities and residents, particularly those who are already suffering environmental injustice.

Primarily, we call on you to (1) deny any pending or future permitting request to develop a large data center in your jurisdiction,¹ and (2) ensure that no data center project be allowed to register as a business within New Jersey’s Urban Enterprise Zones (UEZs)² or to claim any of the tax-exemptions, abatements, or other financial incentives that UEZ status provides.

However, if any permits are approved and must be developed, we call on you to ensure that such centers are (1) equipped with renewable behind-the-meter generation, (2) guarantee lasting jobs for the surrounding community, (3) ensure equitable water usage practices, and (4) require developers/operators to bear all incremental costs associated with serving the center, including

¹ We consider a large data center to be generally - but not always - defined as a large-capacity computing facility that consumes at least 100 MW of continuous electricity, typically housing thousands of servers to support high-volume cloud services, AI workloads, and/or massive data storage for regional or national networks.

² NJ Division of Taxation. “NJ Division of Taxation - Urban Enterprise Zone.” www.nj.gov, 27 Oct. 2025, www.nj.gov/treasury/taxation/businesses/salestax/uez-over.shtml.



transmission upgrades, distribution upgrades, as well as any additional generation capacity required. Furthermore, the facility must be classified as a non-interruptible load: i.e. it may not be used by utilities as a peaker plant or ramp-up resource, nor may it be allowed to curtail service to other customers during periods of high demand. Lastly, the developer/operator must report projected and actual water, energy usage, and noise studies that are in line with the community's vision for their own future.

We offer these suggestions and vocalize our concerns because we recognize the growing body of evidence which suggests that data center developments pose a serious threat to a community's long-term sustainability and well-being. These facilities strain vital water resources, exacerbate environmental risks through excessive power consumption, and shift costs onto ratepayers while failing to deliver lasting economic benefits. A responsible, green energy future - which is aligned with local communities and public interest - cannot and should not include hyperscale data centers.

To be sure, the impacts of hyperscale data centers are not theories from anti-development advocates. Quite the contrary. As environmental justice advocates looking to aid and facilitate a Just Transition, we believe that it is important for EJ communities and workers to be included in jobs training and development which can build a greener, healthier future. However, these centers would likely not only lead to more pollution, but are unlikely to bring lasting jobs to communities who host these centers. In fact, nearly every aspect of a large scale data center leads to a long-term damaging effect:

Severe Strain on Water Resources

Data centers withdraw massive quantities of freshwater for cooling,³ and a majority of that water evaporates on site.⁴ The remaining wastewater can overwhelm municipal treatment plants⁵ that were

³ Yañez-Barnuevo, Miguel. "Data Centers and Water Consumption | Article | EESI." Eesi.org, 25 June 2025, www.eesi.org/articles/view/data-centers-and-water-consumption.

⁴ Id.

⁵ Id.



never designed to handle such loads. This creates a direct threat to local drinking-water supplies and aquatic ecosystems.

Excessive and Risky Electricity Demand

While a single mid-size data center can require between 50–100 MW of continuous power⁶, larger facilities require even more. Some centers currently in development in the United States such as Meta’s in El Paso⁷ can scale as much as 1GW which is enough to power 876,000 houses.⁸ Although many centers claim to have ‘behind-the-meter’ generation, this may not prove to be enough and utilities could be compelled to build additional generation and transmission capacity to meet demand. Projections for PJM - the regional grid operator for New Jersey - show that data center growth will cause peak load to increase by 49GW,⁹ rising over 20%; with annual energy consumption rising over 28%,¹⁰ the region is already starting to feel a measurable price impact from projected data center demand.

Without sufficient safeguards or regulatory oversight requiring centers to cover their own cost, these costs are passed to ratepayers and exacerbate already exceedingly high utility bills. Furthermore, over time, additional generation assets could become stranded if planned developments are cancelled and projected electricity loads do not materialize, which ratepayers must still bear the costs of expanded generation assets,¹¹ threatening the fiscal health of customers and community members.

⁶ International Energy Agency. “Understanding the Energy-AI Nexus – Energy and AI – Analysis - IEA.” IEA, 2025, www.iea.org/reports/energy-and-ai/understanding-the-energy-ai-nexus.

⁷ Meta. “Hello, El Paso! - Meta Data Centers.” Meta Data Centers, 15 Oct. 2025, datacenters.atmeta.com/2025/10/hello-el-paso/.

⁸ Stein, Zach. “Gigawatt (GW) | Definition, Examples, & How Much Power It Produces.” www.carboncollective.co, 9 Jan. 2024, www.carboncollective.co/sustainable-investing/gigawatt-gw.

⁹ Chavin, Sabine, et al. Risks of Rapid Data Center Growth in PJM. 17 Dec. 2024. <https://www.synapse-energy.com/risks-rapid-data-center-growth-pjm>.

¹⁰ Id.

¹¹ Future Bridge Americas. “The True Cost of Stranded Assets in Data Centers.” Future Bridge Americas, future-bridge.us/the-true-cost-of-stranded-assets-in-data-centers/.



Additional Local Air Pollution and Greenhouse Gas Emissions

Assuming that data centers adhere to their promise of ‘behind-the-meter’ generation, without sufficient definitions on what type of power can be utilized, centers may seek to build small fossil-fuel powered generators in order to guarantee 24/7 power for their operations. Continuous burning of fossil-fuels will greatly impact the local air quality levels and guarantee increases in climate-warming greenhouse gas and GHG co-pollutant emissions, which not only contribute to the climate crisis but damage public health outcomes and hurt the community.

In New Jersey, several municipalities already sit at or above state ambient standards for PM_{2.5} and other pollutants,¹² adding even modest generator emissions can push local air quality into exceedance territory, disproportionately affecting the environmental-justice neighborhoods that already experience higher baseline rates of asthma, heart disease, and cardiovascular disease. Consequently, any permitting framework for data centers must explicitly prohibit on-site fossil-fuel units or require zero emission alternatives—such as battery energy storage.¹³

Undermining Climate Justice Goals

The industry’s energy appetite jeopardizes state clean-energy targets. By encouraging utilities to add more fossil-fuel or nuclear generation and by allowing large loads to “shop” for third-party power through retail choice, data centers risk shifting emissions and costs onto vulnerable populations.

¹² NIH. “Air Pollution Table for New Jersey Counties.” Nih.gov, hdpulse.nimhd.nih.gov/data-portal/physical/map?age=001&age_options=ageall_1&demo=234&demo_options=air_pollution_1&physicaltopic=002&physicaltopic_options=physical_2&race=00&race_options=raceall_1&sex=0&sex_options=sexboth_1&statefips=34&statefips_options=area_states.

¹³ NYSERDA. “Battery Energy Storage System Guidebook for Local Governments NYSERDA 17 Columbia Circle Albany, NY 12203 Battery Energy Storage Systems FAQ.” <https://www.nyserdera.ny.gov/-/media/Project/Nyserda/Files/Programs/Clean-Energy-Siting/Battery-Energy-Storage-System-FAQ.pdf>



Limited Local Economic Benefit

While developers tout job creation, most high-skill positions to operate these centers are filled by out-of-state specialists, and the promised “technology hub” effect rarely materializes.¹⁴ In actuality, very few lasting jobs are created after construction is completed, while communities are left with spiking electricity demand, water stress, noise pollution, and new high-voltage transmission lines.

Our policy requests:

- Reject all permits, tax incentives, or zoning changes that would enable new data-center construction until a full, independent environmental impact assessment is completed, and the public has had ample time and opportunity to review, provide comment, and engage in dialogue with elected officials, permit issuing agencies, local utilities, and state utility commissioners regarding the outcome of the assessment.
- If a data center is approved and the community and residents wish for the permit to continue, then we recommend the following policies to ensure environmental safety:
 - Mandate strict water-use caps and require closed-loop cooling systems that do not draw from municipal supplies.
 - Require utilities to demonstrate that any additional generation will be entirely renewable - defined only as energy which does not produce greenhouse gas emissions or co-pollutant emissions - at any point in its lifecycle and couple this renewable generation with battery storage systems and energy efficiency models in order to ensure state-of-the-art operations.
 - Require the developer/operator to prepay or otherwise fully fund all incremental infrastructure upgrades (transmission, distribution, substation, and any new generation capacity) attributable to its load.
 - Prohibit the use of retail-choice mechanisms that could shift costs to residential ratepayers, furthering the financial burden to residents and especially low- and moderate-income,

¹⁴ O’Leary, Sean. “Why Data Centers Will Be Economic Development Duds.” Ohio River Valley Institute, 11 Nov. 2025, ohiorivervalleyinstitute.org/why-data-centers-will-be-economic-development-duds/.



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renters, and otherwise energy-burdened customers.

- Classify the data center as a non-interruptible load; it may not be used by utilities as a peaker or ramp-up resource, nor may it be curtailed during system stress events.
- Developers/operators must submit baseline and ongoing monitoring (soil quality, surface-water and groundwater quality, air-quality, noise, and public-health indicators) to the NJDEP and the communities that would be impacted.
- Prioritize investments in distributed edge computing, energy efficiency upgrades, and clean-energy projects that align with state climate goals rather than large, centralized facilities.

We write these thoughts to attempt to find a pathway towards realizing environmental justice in an economy that is increasingly relying on generative AI and large scale data centers. We stand ready to engage in these critical conversations and navigate a path forward which is most protective of residents, workers, public health, and the environment.

In solidarity,

New Jersey Environmental Justice Alliance

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