

From: Elizabeth Pham [REDACTED]
Sent: Tuesday, July 29, 2025 12:34 PM
To: Longenbaugh, Allison <LongenbaughA@naperville.il.us>; White, Benny <WhiteB@naperville.il.us>; Holzauer, Ian <Ian.Holzauer@naperville.il.us>; McBroom, Josh <McBroomJ@naperville.il.us>; Wilson, Nate <WilsonN@naperville.il.us>; Kelly, Patrick <KellyP@naperville.il.us>
Subject: Concern Regarding Proposed Data Center in Naperville

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Dear Naperville City Council Members,

I hope this message finds you well. My name is Liz Pham, and I am a Naperville resident living in Naper Commons which is adjacent to the vacant land where a data center has recently been proposed by the Nokia campus.

I am writing to express my deep concern about this potential development. The idea of a large-scale data center being built so close to our homes raises many questions and uncertainties for residents like myself, especially in terms of environmental impact, noise, heat output, property value implications, and long-term infrastructure strain. I know that these concerns are shared with most, if not all, other residents in our neighborhood.

The letter attached is greatly concerning knowing that the sale was to a real estate company that deals primarily with creating data centers. With the sale to Karis, can no other development be made besides a data center?

I would greatly appreciate your guidance on the following:

1. **What is the current timeline for decision-making on this proposal?**
2. **What steps can residents take to voice our opposition and prevent the data center from being approved or constructed?**

As someone who chose this neighborhood for its peaceful residential character, I'm deeply invested in preserving its quality of life. I would welcome any opportunity to be part of the discussion or public forums where this matter is addressed.

Thank you for your attention and for representing the concerns of Naperville residents. I look forward to hearing from you.

Thanks,

Liz

From: City of Naperville Citizen Support <napervilleil@mycusthelp.net>
Sent: Thursday, July 31, 2025 1:43 PM
To: Pruneda, Rachel <PrunedaR@naperville.il.us>
Subject: Citizen Question Submissions for Mayor/Council (GovQA Reference # W290320-073125)

Citizen Support Center (GovQA) Mayor/Council Submission

You are receiving this email to alert you that a new Mayor/Council submission has been created and assigned to you.

Contact Name: Hyacinth Vincent

Customer Name: Hyacinth Vincent

Email: [REDACTED]

Phone: [Phone]

Reference Number: W290320-073125

Create Date: 7/31/2025 1:42:15 PM

Status: New Request

Request Type:

Question/Concern

Description:

I am writing to firmly voice our community's deep concerns and strong opposition to the construction of a data center near the forest preserve and within our neighborhood. This proposal threatens the unique character, environmental balance, and long-term health of our town—values we believe must be preserved at all costs.

We specifically chose this area because of its serene surroundings, close proximity to the forest preserve, and its reputation as a quiet, nature-focused place to raise families. A data center of this scale is simply not compatible with the spirit or infrastructure of our neighborhood. The industrial noise, constant truck traffic, increased utility demands, and potential environmental hazards stand in stark contrast to the peaceful residential and natural setting we now enjoy.

This location is not just geographically ill-suited—it's symbolically wrong. Placing a massive facility next to a cherished green space sends a troubling message about the priorities of our town. We must ask: why compromise our most treasured asset—our environment—for a facility that offers minimal direct benefit to local residents? The long-term impacts on air quality, water runoff, wildlife corridors, and even property values have not been addressed transparently. And once the forest edge is disturbed, it cannot be restored.

We are not against progress or technology, but we believe it must be placed responsibly, away from sensitive ecosystems and residential areas. There are other more appropriate zones for such development that would not threaten the character or livability of our town.

We urge the council to reconsider this plan and defend the integrity of our neighborhood and the forest preserve. Let's preserve the vision and values that brought us here in the first place.

Click the link below to review and/or respond to the submission.



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Kopinski, Sara

From: Iwicki, Brad
Sent: Monday, August 4, 2025 3:06 PM
To: Kopinski, Sara
Subject: FW: Extreme resident concern over proposed data center at 1960 Lucent Lane
Attachments: Data Center.txt

Hi Sara,

Please see the public comment related to the data center below. You can find the original email in the Planning Inbox.

Thank you,

Brad Iwicki

Assistant Planner | Planning & Development – TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 305-7021 | iwickib@naperville.il.us

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From: Fayette Powers <[REDACTED]>
Sent: Friday, August 1, 2025 2:46 PM
To: Planning <Planning@naperville.il.us>
Subject: Fwd: Extreme resident concern over proposed data center at 1960 Lucent Lane

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RE: 8/20/2025 Planning and Zoning Commission meeting

Data centers... Given that the noise, air pollution, and other data center impacts can extend into nearby

residential areas and beyond, they should be classed/zoned as heavy industrial. According to CEDS (Community and Environmental Defense Services)

----- Forwarded message -----

From: **Fayette Powers** [REDACTED]

Date: Fri, Aug 1, 2025 at 11:57 AM

Subject: Extreme resident concern over proposed data center at 1960 Lucent Lane

To: <syeda@naperville.il.us>, <wehrlis@naperville.il.us>, <gibsonm@naperville.il.us>, <holzhauseri@naperville.il.us>, <kellyp@naperville.il.us>, <longenbaugha@naperville.il.us>, <mcbroomj@naperville.il.us>, <whiteb@naperville.il.us>, <wilsonn@naperville.il.us>

The residents of the Naper Commons neighborhood in very close proximity to this proposed project have significant concerns.

A data center proposal should only be considered after a thorough analysis of each potential impact has been made available to decision-makers as well as area residents and other interested parties. We would expect that the assessment will be accurate and unbiased if it is conducted by an independent party hired by the decision-making body using funds provided by the applicant-developer. The analysis should prove that the data center will not cause adverse impacts, such as noise, beyond the data center property line.

Given that the noise, air pollution, and other data center impacts can extend into nearby residential areas and beyond, they should be classed/zoned as heavy industrial.

I have used as a resource CEDS (Community and Environmental Defense Services) to outline a number of concerns and our expectations of you, our local government officials. Please see the attachment.

It is disappointing that neighboring residents have been left largely uninformed of this proposed project. A few neighbors received a letter in the mail from the attorneys of Karis Critical regarding an open house/informational session scheduled for the evening of Tuesday, August 5th. In this letter they state, "Karis Critical has submitted plans to the city of Naperville for redevelopment of the Property as a data center campus. We anticipate the project will run through the city's formal development process in the coming months."

Neighboring residents deserve not only information, but to be a part of the decision-making process.

Sincerely,

Fayette Powers Wernick
[REDACTED]

A data center proposal should only be considered after a thorough analysis of each potential impact has been made available to decision-makers as well as area residents and other interested parties. It is more likely that the assessment will be accurate and unbiased if it is conducted by an independent party hired by the decision-making body using funds provided by the applicant-developer. The analysis should prove that the data center will not cause adverse impacts, such as noise, beyond the data center property line.

To increase the likelihood that a proposed data center will not become a troublesome neighbor, consider asking your local elected officials to require the applicant-developer provide a listing of existing data centers that:

Resemble the facility proposed near your home,

Employs the same impact mitigation measures proposed to protect you and your neighbors,

Were built by the same developer proposing the facility near you, and

Will be operated by the same party as that which will take over the building upon completion.

There are reports that disturbing noise levels can extend up to 3,000 feet from some data centers and less disturbing noise may be detected as far away as two miles. A portion of data center noise appears to be low frequency which we may not hear but can still affect our health and well-being. To learn more about low-frequency (bass) noise from one data center and possible health effects see the WUSA9 Science of data center noise news video at: <https://www.youtube.com/watch?v=Jf1FFqbZ1X8>

Again, it appears that excessive noise has been documented at some data centers; not all. To increase the likelihood that a proposed data center will not create noise interfering with your quality of life and that of your neighbors, consider calling for:

Cooling with closed loop water systems, not air-cooling, and

Locating diesel generators inside buildings with highly-effective sound reduction measures. Better yet, maximize the use of onsite battery storage to minimize the need to run diesel generators when line voltage is insufficient.

Generators should be fully enclosed within a building that has highly-effective (full acoustical enclosures) sound proofing. If homes, schools, and other sensitive uses are only located on one side of a proposed data center then generators should be positioned on the opposite side so the building mass can reduce noise impacts.

Battery backup systems could also serve to minimize the amount of time generators run during an emergency. While solar, wind, and other on-data-center-site clean-energy sources may not be sufficient to meet all power needs, they can recharge batteries that then reduce the duration of diesel generator operation.

Diesel generator emissions can pose a threat to the health of area residents if they run at times other than during rare emergencies. Diesel exhaust particulates contain over 40 known cancer-causing organic substances.

Independent Noise Impact Study Essential

A data center proposal should only be considered after a thorough noise impact analysis has been made available to decision-makers as well as all area residents and other interested parties. The analysis should be conducted by an independent party hired by the decision-making body but paid for by the applicant. The analysis should prove that the data center will not cause noise levels that exceed applicable standards at the data center property line.

As with noise, consider calling upon decision-makers to require the applicant to first demonstrate that they are making maximum use of battery systems to minimize the need for diesel- or gas-powered generators. Additionally, the applicant should provide the funds for retaining an independent expert to assess the potential health impacts if any diesel generators will serve as a backup power source.

Water Supply Impacts

All data centers need a cooling system. Cooling by air or water are the most common. A single water-cooled data center may need a half-million gallons per day unless it is a closed loop system where only 5% of the volume is lost per year. Another issue with systems that are not closed loop is the thermal and other pollution impacts of cooling water discharged to a stream or other aquatic resource. The discharged cooling waters may contain anti-fouling chemicals that could have a toxic or other pollutional impact to receiving waters.

Given the noise impact of air-cooling, all data centers should be water cooled with a closed-loop system. If for some reason closed-loop water cooling is rejected then insist on an independent assessment of potential impacts such as:

If the cooling water source will be an underground aquifer, then will the data center withdrawal cause water levels to drop to a point that other users can no longer obtain enough water? This would be especially critical issue if area homes and other users obtain water from relatively shallow wells.

If a surface body like a lake, reservoir, river or even a stream will be the data center water source then will the withdrawal exceed the safe or sustainable yield of the water body? Safe or sustainable yield is the amount of water that can be withdrawn without adversely affecting aquatic ecosystems or other water users.

If a data center will use water from a public system, then will it cause water pressure to drop below that needed for fire suppression and other uses?

Note that some jurisdictions require data center applicants to consider using wastewater for cooling. If a data center is proposed near a sewerline or wastewater treatment plant then this option should be considered with the data center developer covering all associated costs.

All residents could be forced to pay higher electricity bills if data center developers-owners are not required to pay for new transmission lines or other infrastructure needed to accommodate these facilities. For example, an analysis by Dominion Energy indicated that doubling peak energy capacity largely to accommodate data center proliferation could cause energy bills for all Virginia households to skyrocket 120% by 2039.

Given that the noise, air pollution, and other data center impacts can extend into nearby residential areas and beyond, they should be classed as heavy industrial.

If data centers are allowed in light industrial or even some commercial zoning districts then an additional permit should be required that triggers a more in depth and open review process. The permit may be called a Special Exception, Conditional Use, or Special Use. These permits usually require:

Public notice to nearby residents and others via a letter, signs, etc.,

More detailed impact studies especially noise,

Required findings that the data center will not harm nearby residents,

A public hearing, and

An opportunity to appeal an unfavorable decision to the local elected body (town council, county supervisors, etc.).

The zoning ordinance might also include use standards such as:

To minimize noise impacts, require closed loop water cooling and diesel generators in heavily sound-proofed enclosures,

Data center buildings should be at least 300 feet from residential property lines,

The data center site should have highly-effective (95% opacity) visual buffers that screen not just the building but the security (prison-looking) perimeter fence, substations, and other objectionable features from the view of nearby homes,

To prevent glare into nearby homes, data center lighting should conform to the Five Principles for Responsible Outdoor Lighting from Dark Sky International,

To reduce diesel pollution generators should be Tier 4 or possibly Tier 2 generators with selective catalytic reduction systems or, if practical, use of alternative (lower-impact) fuels such as hydrotreated vegetable oil (HVO),

A portion, though preferably all, of data center electricity is contracted to come from solar, wind, or other clean energy sources. While onsite solar should be considered it can only

provide a portion – not all – of the necessary electricity:. Here’s why: 0.13 megawatt (MW) of electricity per solar acre x 48-acre average data center site = 6.2 MW vs. the 20- to 100-MW needed by a data center.

Onsite battery systems can reduce the amount of time diesel generators must run when line voltage is insufficient,

Data centers should meet environmental management standards such as the International Organization for Standardization’s (ISO) 14001 standard, and

Certification by the Regional Transmission Organization (RTO) that sufficient power is available so diesel generators will be rarely needed and only during a true emergency.

Kopinski, Sara

From: Egner, Therese
Sent: Wednesday, August 6, 2025 7:09 AM
To: Kopinski, Sara
Subject: FW: VOTE NO ON THE DATA CENTER

Hi, Sara! This public comment came in through POD for Karis Critical.

Therese Egner

Assistant Planner | Planning & Development - TED Business Group
City of Naperville | 400 S. Eagle St. Naperville, IL 60540
(630) 420-4179 | egnert@naperville.il.us

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From: Becca Bogle <[REDACTED]>
Sent: Tuesday, August 5, 2025 10:11 PM
To: Planning <Planning@naperville.il.us>
Subject: VOTE NO ON THE DATA CENTER

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I am deeply frustrated with the city of Naperville possibly approving this data center off of warrenville road in naperville. We chose to live in Naperville in our new subdivision Naper Commons because of the beauty of the forest preserve. I am INFURIATED to think that the city of Naperville would promote such pollution and want to DECREASE our home value. We have worked hard to establish a residence, build a home for our kids and I REFUSE to live next to A DATA center. These are all the reasons I will be VOTING AGAINST this.

The amount of energy needed is drastic and I do not want it to directly increase my electrical bill, along with our power grid not being able to support such amounts.

WATER CONSUMPTION— I am not interested in having a scarcity of water.

and #1 AIR QUALITY— its giving FLINT MICHIGAN. I refuse to have my home polluted by a data center. I am beyond frustrated with the city of Naperville. I hope it does not come to this, however I do have a strong presence on social media (40,000 followers) and will be sharing about the downfall of the city of Naperville if this Data Center gets approved.

I strongly am against this decision, and I hope our city of naperville board members will VOTE NO on approving this data center, as it has ZERO benefit to the public and only provides a PAY OFF for the individuals voting yes, so they can cover up the negative affects of a data center in the community.

Becca Bogle

Content Creator & Personal Stylist



Kopinski, Sara

From: Planning
Sent: Wednesday, August 6, 2025 9:11 AM
To: Kopinski, Sara
Subject: FW: Please Oppose the Proposed Data Center Near Naper Commons

FYI

Adam Beaver, AICP

Community Planner | Planning & Development - TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 420-4193 | beavera@naperville.il.us

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From: Ryan Olsen <[REDACTED]>
Sent: Wednesday, August 6, 2025 7:35 AM
To: Holzhauser, Ian <Ian.Holzhauser@naperville.il.us>; Longenbaugh, Allison <longenbaugha@naperville.il.us>; Syed, Ashfaq <SyedA@naperville.il.us>; Wilson, Nate <WilsonN@naperville.il.us>; Gibson, Mary <GibsonM@naperville.il.us>; Kelly, Patrick <KellyP@naperville.il.us>; McBroom, Josh <McBroomJ@naperville.il.us>; White, Benny <whiteb@naperville.il.us>; Wehrli, Scott <WehrliS@naperville.il.us>; Planning <Planning@naperville.il.us>
Subject: Please Oppose the Proposed Data Center Near Naper Commons

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Dear Mayor Wehrli, Council Members, and Planning & Zoning Commission,

My Name is Ryan Olsen and I am writing as a concerned resident to urge you to **oppose the proposed data center near the Naper Commons development**. While I understand the need for economic development in Naperville, this proposal presents serious concerns that threaten the character, safety, and value of nearby residential communities.

Councilman Ian Holzhauer is right to oppose this project, and I applaud his leadership. I respectfully call on the rest of the Council and the Mayor to reconsider their support for this proposal for the following reasons:

1. Incompatible with Surrounding Residential Areas

The proposed data center site is directly adjacent to multiple established and growing residential neighborhoods, including **Naper Commons, Indian Hills, the newly developing Northwoods of Naperville**, and areas bordering the **Danada Forest Preserve**. These are high-quality communities with **\$500,000+ homes and townhomes**. Placing a massive industrial facility near these neighborhoods directly undermines the investments homeowners have made in Naperville's west side. Residents in the townhomes closest to Naperville road will be less than a few hundred feet from the site.

2. Guaranteed Loss of Property Value

It is virtually guaranteed that this data center will **devalue nearby properties**. Industrial development of this scale—bringing noise, heat, diesel exhaust, and 24/7 operations—will deter future buyers and erode the equity of existing homeowners. Residents who have invested heavily in these communities now face the unacceptable risk of diminished property values as a direct result of city-sanctioned development.

3. Environmental and Quality-of-Life Concerns

The **Danada Forest Preserve**, a treasured natural space, will also feel the effects of this development. Increased heat, air, and noise pollution from cooling systems and generators will disrupt the ecological balance of the area and impact wildlife and trail use. The quality of life for residents who value outdoor recreation and a peaceful neighborhood environment will be significantly compromised.

4. Limited Community Benefit

Data centers offer **very few permanent jobs** and contribute little to the local economy beyond tax revenue. In contrast, they impose long-term infrastructure demands and create burdens for residents without improving the community's day-to-day life. Simply put, this is a poor tradeoff.

5. Better Locations Are Available

Naperville has designated **industrial corridors** far better suited for this type of development. Choosing to place this facility next to high-value neighborhoods and preserved natural space is short-sighted and sets a **troubling precedent** for future development decisions.

We urge the Council and Mayor to put the well-being of residents first. Naperville's strength has always come from its thriving neighborhoods, green space, and thoughtful planning—not from prioritizing industrial use over community quality of life.

Please stand with the residents of **Naper Commons, Indian Hills**, and future residents of **Northwoods of Naperville**, and all those who care about protecting our investments and environment. Follow Councilman Holzhauser's lead and vote **NO** on this project.

Sincerely,

Ryan Olsen



Kopinski, Sara

From: Egner, Therese
Sent: Thursday, August 7, 2025 2:39 PM
To: Kopinski, Sara
Subject: FW: Concerned Resident-Please REJECT Proposed Data Center

Hi, Sara! This public comment for Karis came in POD today.

Therese Egner

Assistant Planner | Planning & Development - TED Business Group
City of Naperville | 400 S. Eagle St. Naperville, IL 60540
(630) 420-4179 | egnert@naperville.il.us

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From: Steve Jarvis <[REDACTED]>
Sent: Thursday, August 7, 2025 2:28 PM
To: Wehrli, Scott <WehrliS@naperville.il.us>; Holzhauer, Ian <Ian.Holzhauer@naperville.il.us>; Longenbaugh, Allison <LongenbaughA@naperville.il.us>; Syed, Ashfaq <SyedA@naperville.il.us>; Wilson, Nate <WilsonN@naperville.il.us>; Gibson, Mary <GibsonM@naperville.il.us>; Kelly, Patrick <KellyP@naperville.il.us>; McBroom, Josh <McBroomJ@naperville.il.us>; White, Benny <WhiteB@naperville.il.us>; Planning <Planning@naperville.il.us>
Subject: Concerned Resident-Please REJECT Proposed Data Center

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Dear Mayor Wehrli and Council Members,

My name is Steve Jarvis, and I am writing as a very concerned Naperville resident and President of the Naper Commons Homeowners Association. I urge you to oppose the proposed data center near the Naper Commons development at the intersection of Naperville and Warrenville Roads.

This project poses a serious threat to the character, safety, and property values of our residential

communities. Councilman Ian Holzhauser has rightly opposed this proposal, and I strongly encourage the rest of the Council and the Mayor to follow his lead and reject this development.

Here are my primary concerns:

1. Incompatible with Residential Neighborhoods

The proposed site borders established and growing communities, including Naper Commons, Indian Hills, Northwoods of Naperville, and land adjacent to the Danada Forest Preserve. These are family-oriented neighborhoods where residents have invested in a peaceful, safe environment. A large industrial data center within a few hundred feet of these homes is an unacceptable encroachment.

2. Impact on Property Values

Homes in our neighborhoods are valued at over \$600,000, reflecting their quality and desirability. The noise, 24/7 operations, diesel exhaust, and industrial presence of this data center will inevitably reduce property values and undermine residents' investments.

3. Safety and Traffic Concerns

Many families with young children live here. Increased construction and operational traffic on roads not designed for heavy industrial use will increase safety risks and disrupt the quiet, livable atmosphere we expect.

4. Strain on Power Infrastructure and Work-from-Home Disruption

Data centers consume massive amounts of electricity, putting strain on our local power grid. This threatens power reliability for residents, many of whom work remotely and depend on stable, quiet environments. Noise from generators and cooling systems will further disrupt home offices and daily life.

5. Environmental Harm to Danada Forest Preserve

The nearby preserve will suffer from increased heat, noise, and air pollution, negatively affecting wildlife and recreational use of the trails.

6. Limited Community Benefits

This facility will create few permanent jobs and offers little beyond tax revenue. The burdens it imposes far outweigh the minimal benefits to our community.

7. More Suitable Locations Exist

Naperville has designated industrial zones designed for such facilities. Placing this data center adjacent to residential neighborhoods and protected green spaces is short-sighted and risks setting a damaging precedent.

I urge you to prioritize the quality of life, safety, and property values of Naperville residents over this ill-conceived project. Please stand with the families of Naper Commons, Indian Hills, Northwoods, and all neighbors who value our community's character and environment. Vote NO on the proposed data center at Naperville/Warrenville Roads.

Thank you for your attention to this critical matter.

Sincerely,
Steve Jarvis

Very Concerned Naperville Resident
President, Naper Commons Homeowners Association

Kopinski, Sara

From: Egner, Therese
Sent: Monday, August 11, 2025 9:02 AM
To: Kopinski, Sara
Subject: FW: Data Center Naperville i88 Corridor

Hi, Sara! This public comment came in for Karis Critical. Hope you had a nice weekend!

Therese Egner

Assistant Planner | Planning & Development - TED Business Group City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 420-4179 | egnert@naperville.il.us

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-----Original Message-----

From: Jake Hildenbrand [REDACTED]
Sent: Friday, August 8, 2025 1:56 PM
To: Planning <Planning@naperville.il.us>
Subject: Data Center Naperville i88 Corridor

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Planning/Zoning Committee,

I'm writing you today as another concerned Naperville citizen. We have had an outpouring of issues with the new data center being proposed on the north-side of Naperville.

There are a number of things that have been discussed in the community so far and no one is pleased with it being built in our backyards. We currently live in Naper Commons and would like to understand why the push for a data center is best for Naperville. And the tax revenue that is generated from it seems to be the only positive we can come up with. And the worst part is, that revenue isn't even used to benefit our families and children because we are forced to attend Wheaton school districts while living in Naperville. I have always had a positive view of the City of Naperville being raised

here and having family in Naperville since the 40's, but this new development doesn't seem to serve a purpose besides revenue generation.

Naperville is one of the wealthiest areas in the western suburbs and has a high standard of living throughout. It has great schools and great community. I believe this data center development is strictly thought of as a tax revenue generator.

It is concerning with the relative size and energy consumption of data centers that Naperville would approve something so close in proportion to the Forest Preserve and natural area of Herrick Lake. According to the Illinois Constitution; Article XI, Section 1 clearly states that it is public policy of the state to provide and maintain a healthy environment for future generations. We as a community have the right to a healthy environment which I'm sure a data center is going to negatively effect the area surrounding it due to resources and generator pollution. It is unacceptable to ignore the fact that in most cases data centers have created issues in communities and their surrounding natural environments.

Has the issue of noise and diesel pollution come up in conversation. It would be important to nail down noise restrictions on being in place with communities being built so close to this designated area. 9am-5pm of standard business hours would be the only time generators could be checked and ran. It's also important to follow and enforce the same decibel requirements throughout the entire city of Naperville. This data center should have no exception to this rule. The water consumption will undoubtedly increase with a data center running at full capacity daily; and the water bill and municipality's supply of water will be restricted to nearby communities during operation. It would also be unfair to see an increase in water bills for Naperville communities due to a data center pulling large capacities of water every hour.

Overall I think it's important to ask Naperville communities for their opinions and keep us informed because it's the city councils duty to make decisions with families and communities best interest in mind. That alone has made the City of Naperville great today. Focusing on adding tax revenue to the books has not made Naperville prosperous over the decades. Keeping communities strong and loyal to the area has continued to push Naperville forward.

Please review the above points and respond with updates and plans for future talks about this data center. I appreciate the transparency in your responses and to keep Naperville families in mind.

Best,

Jacob Hildenbrand

██████████
████████████████████

Kopinski, Sara

From: Egner, Therese
Sent: Tuesday, August 12, 2025 3:12 PM
To: Kopinski, Sara
Subject: FW: Regarding Case DEV-0057-2025

Hi Sara! Please see public comment for DEV-0057-2025, Karis Critical.

Therese Egner

Assistant Planner | Planning & Development - TED Business Group
City of Naperville | 400 S. Eagle St. Naperville, IL 60540
(630) 420-4179 | egnert@naperville.il.us

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From: Lori A Melhart, LCSW [REDACTED]
Sent: Tuesday, August 12, 2025 3:05 PM
To: Planning <Planning@naperville.il.us>
Subject: Regarding Case DEV-0057-2025

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To the Naperville Planning and Zoning Commission:

Regarding Case DEV-0057-2025 – Public Notice of Application by Karis Critical, LLC, concerning the Nokia property (identified by the parcel numbers listed in the public notice), I am writing to express my **significant concerns**. This proposal, which seeks approval for a conditional use to allow the operation of a data center campus, a variance for reduced parking, a variance for an increased equipment yard screen wall height, and a variance for an increased security fence height to 8 feet, will be

discussed at the Public Hearing before the Naperville Planning and Zoning Commission on Wednesday, August 20, 2025, at 7:00 p.m. in the Council Chambers at the Naperville Municipal Center, 400 S. Eagle Street, Naperville, Illinois.

The plan involves the construction of two 211,000 square foot data centers. While it is presented as economic development, this project poses **serious, permanent risks to our community, environment, and quality of life**. These impacts cannot be fully mitigated and will be irreversible once built.

A critical issue is the **lack of detailed information needed for a thorough assessment**. We have not received disclosures regarding **primary or backup power sources, total energy draw, or grid impact, and the power study has not been shared with the public**. There's insufficient information about the **stated cooling method, water source, estimated consumption, or potential future changes**. A **stormwater management plan and environmental impact statement** are missing, as is an assessment of **habitat loss or effects on neighboring forest preserves**. Furthermore, no projections for permanent jobs or tax revenue have been provided. Without these details, the public and the city cannot fully assess the risks or benefits of this proposal.

I have significant concerns about the potential consequences of this project. It threatens **permanent environmental damage through the destruction of green spaces and habitats near forest preserves, the alteration of the local microclimate due to heat discharge from servers and cooling systems, and the annual use of millions of gallons of water for cooling, which risks future water shortages**.

There are also serious **health and safety risks**. Diesel generator emissions (particulate matter, nitrogen oxides, sulfur dioxide) are linked to respiratory illness and cancer. The noise from cooling systems and generators could disrupt sleep and well-being, and light pollution would alter neighborhood character and night sky visibility.

The proposal also poses a **strain on our infrastructure**, with potential overloading of the local power grid, increased stormwater runoff and flooding risk from massive impermeable surfaces, and significant traffic increases during construction and operation.

From an economic and community perspective, I am concerned about a **decline in our property values** due to industrial-scale development, limited permanent job creation relative to the project's scale, and the loss of land that could be used for community-benefiting projects.

Finally, there is a distinct lack of transparency. There has been no disclosure of the ultimate customer(s) or long-term commitments, the ownership or lease/purchase agreements are unclear, and there is no guarantee that the site won't be abandoned if the operator leaves.

I strongly believe that no amount of "conditions" can fully mitigate these risks. Once built, the impacts of two 211,000 square foot data centers will be permanent and irreversible. I urge the City of Naperville Planning and Zoning Commission to **deny Case DEV-0057-2025 in its entirety** to protect the health, safety, and quality of life of its residents.

Thank you for your time and consideration of this urgent matter.

Lori A. Melhart, LCSW

[REDACTED]

she/her/ella

All are welcome here!

Sent with [Proton Mail](#) secure email.

Kopinski, Sara

From: Iwicki, Brad
Sent: Wednesday, August 13, 2025 4:57 PM
To: Kopinski, Sara
Subject: FW: Opposition to proposed data center next to Naper Commons in Naperville

FYI – Data Center

Brad Iwicki

Assistant Planner | Planning & Development – TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 305-7021 | iwickib@naperville.il.us

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From: aashna taneja <[REDACTED]>
Sent: Wednesday, August 13, 2025 4:51 PM
To: Planning <Planning@naperville.il.us>
Subject: Opposition to proposed data center next to Naper Commons in Naperville

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I'm a homeowner at Napercommons townhomes, literally adjacent to the proposed data center site. Our community is brand new, within District 203, and many families (mine included) paid a premium to live here for the schools, safety, and proximity to the forest preserve. Siting an industrial-scale data center in the middle of a residential neighborhood and sensitive open space is fundamentally incompatible with the character, safety, and expectations of this area. I respectfully ask the City to deny the proposal.

Key Concerns

1. Land-Use Incompatibility & Comprehensive Plan

- A high-intensity, 24/7 industrial use conflicts with adjacent single-family/townhome residences and forest preserve uses.
- The visual massing, continuous operations, and ancillary infrastructure (substation, chillers, generators) do not belong on a neighborhood edge.

2. Noise & Vibration

- Constant mechanical noise (cooling towers/chillers), backup generator testing, and truck traffic will erode quality of life.
- Nighttime noise carries; low-frequency hum and tonal noise are especially disruptive to sleep and children.

1. Air Quality & Emissions

- Backup diesel generators and construction activity increase particulate matter and NOx.
- Fuel storage on site introduces spill risk and odors during exercising/testing cycles.

1. Water Use, Thermal Discharge & Stormwater

- Large cooling loads may strain municipal water, potentially raising costs or stressing supply during heat waves.
- Evaporative systems can create visible plumes and chemical drift from water treatment.
- Added impervious area increases runoff; failure risks flooding for homes downhill.

2. Light Pollution & Heat Island

- Security lighting and building glow degrade dark skies and affect wildlife and sleep hygiene.
- Large paved and mechanical areas raise local ambient temperatures.

1. Wildlife & Forest Preserve Interface

- Habitat fragmentation, fencing, and round-the-clock activity disrupt adjacent preserves and corridors.
- Stormwater or chemical releases threaten sensitive species.

1. Safety, Trespass & Security

- Industrial sites attract trespass/curiosity; perimeter security can push foot traffic into our yards and common areas.
- Fuel and battery energy storage (if proposed) introduce fire/hazard risks near homes and a school district full of children.

2. Property Values & Equity

- This community paid premium pricing with the expectation of residential compatibility. An industrial neighbor will depress values and shift burdens to current taxpayers

3. Grid Impacts

- High, concentrated electrical demand can drive costly grid upgrades and increase outage risk for nearby residents.

Thank you

Aashna Taneja

Kopinski, Sara

From: Egner, Therese
Sent: Thursday, August 14, 2025 9:01 AM
To: Kopinski, Sara
Subject: FW: DATA CENTER CONCERNS

Hi Sara,

This public comment for Karis Critical came in POD.

Thank you!

Therese Egner

Assistant Planner | Planning & Development - TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 420-4179 | egnert@naperville.il.us

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From: Desmond [REDACTED]
Sent: Wednesday, August 13, 2025 4:48 PM
To: Holzhauser, Ian <Ian.Holzhauser@naperville.il.us>; Syed, Ashfaq <SyedA@naperville.il.us>; Wilson, Nate <WilsonN@naperville.il.us>; Gibson, Mary <GibsonM@naperville.il.us>; McBroom, Josh <McBroomJ@naperville.il.us>; Kelly, Patrick <KellyP@naperville.il.us>; White, Benny <WhiteB@naperville.il.us>; Wehrli, Scott <WehrliS@naperville.il.us>; Planning <Planning@naperville.il.us>; Longenbaugh, Allison <LongenbaughA@naperville.il.us>
Subject: DATA CENTER CONCERNS

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Dear Mayor Wehrli and Council members,

We are writing you to express our deep concern regarding the proposed Data Center near the Naper Commons development. We recently became residents of Naperville to enjoy our retirement

years. The proposed Data Center presents serious concerns that threaten the character, safety and value of our nearby residential communities.

We align with councilman Ian Holzhauer to oppose the project and ask the remaining council members and Mayor Wehrli to reconsider their support for this proposal for the concerns noted above.

According to the Daily Herald, the proposed Data Center for Naperville is approximately 600,000 sf. The Bloomberg Report stated that a recent 200,000sf Data Center proposed for VA could use as much energy as 30,000 homes. How exactly will this affect us? Also, the report stated that Data Centers use more electricity than most countries. Noise and the cost of electricity are also concerns.

We did not move to Naperville in 2023 to be living adjacent to a Data Center and have our property value decline.

Please stand with the residents of Naper Commons and all those who care about protecting our investment and environment and vote NO on the Data Center project.

Charles and Charyn Desmond

Kopinski, Sara

From: Planning
Sent: Monday, August 18, 2025 9:20 AM
To: Kopinski, Sara
Subject: FW: Objection to DEV-0057-2025 In re Karis Critical Member, LLC
Attachments: signed_Objection to DEV-0057-2025 In re Karis Critical Member, LLC .pdf; AI's Hidden Threat to Public Health - IEEE Spectrum.pdf

Hi Sara,

See below and attached public comment for the data center.

From: Wilton Person <[REDACTED]>
Sent: Sunday, August 17, 2025 11:41 AM
To: Planning <Planning@naperville.il.us>
Subject: Objection to DEV-0057-2025 In re Karis Critical Member, LLC

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Dear Planning & Zoning Commission,

Please find correspondence attached for your review. Please confirm receipt.

Sincerely,

Wilton Person

August 17, 2025

To: The Naperville Board and Zoning Commission

Objection to DEV-0057-2025 In re Karis Critical Member, LLC

The purpose of this letter is not only to object to Petitioner Karis Critical Member's request for conditional approval of DEV-0057-2025 but to request that the City of Naperville ban data centers until such time that the environmental and health impact of data center operations can be fully researched and documented. Although my family currently lives less than a ½ mile from the proposed data center, recent research supports that the air pollution caused by data centers would be far reaching beyond the immediate area of the data centers. See attached: *We Need to Talk About AI's Impact on Public Health Data-Center Pollution is linked to asthma, heart attacks, and more.*

By now, members of the Board and Zoning Commission have read the hundreds of comments and letters from Naperville residents objecting to this data center project based upon serious concerns related to noise pollution, air pollution, heavy stress on electricity and water use, harm to wildlife in the DuPage County Forest Preserve, quality of life concerns, and decreased property valuations.

My objection and ban request is based upon all of these reasons referenced above. However, my primary concern is based upon the irreparable public health harm that would be caused by air pollution as referenced in the attached article. It would be short-sighted for Naperville to mortgage the future health of its residents including children attending District 203 schools by approving a data center project that would expose Naperville residents to an increase in air pollution that would exacerbate respiratory conditions, increase public health costs, and likely result in premature deaths.

Unlike a proposed prison, mining operations, or other projects that are clearly undesirable on their face, the harm caused by the data centers may be less obvious but more insidious. The data centers will be windowless warehouses surrounded by high fences that strain Naperville's electricity and water resources while simultaneously creating harmful noise and air pollution.

The reality is that the health and quality of life of Naperville residents and the numerous children who attend District 203 are priceless and no amount of increased revenues or revenues specifically earmarked to District 203 are worth jeopardizing the health and quality of life for Naperville residents. Further, the negative impact on the environment and the wildlife that make the DuPage County Forest Preserve their home also supports a unanimous denial of this project. There are hundreds of better uses of this property that would positively impact the quality of life for Naperville residents.

I am requesting that the Board and Zoning Commission deny conditional approval for DEV-0057-2025 and that the City of Naperville pass an ordinance that bans future proposed data centers within the City of Naperville.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Person".

Wilton A. Person
Naperville Resident

IEEE Spectrum

OPINION AI

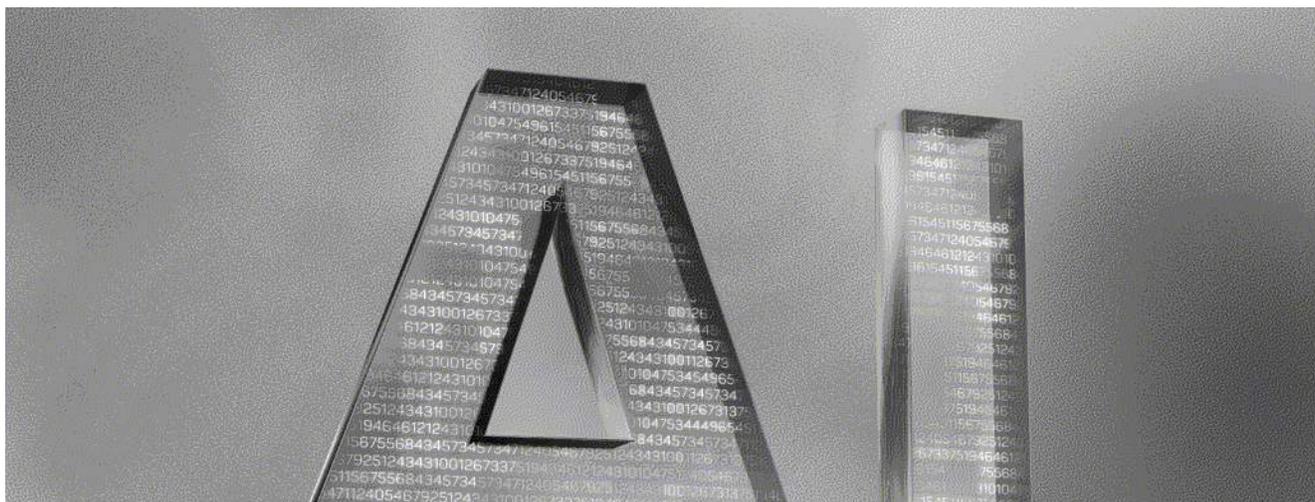
We Need to Talk About AI's Impact on Public Health > Data-center pollution is linked to asthma, heart attacks, and more

BY ADAM WIERMAN SHAOLEI REN

01 MAY 2025

Adam Wierman is the Carl F. Braun professor of computing and mathematical sciences at Caltech.

Shaolei Ren is an associate professor of electrical and computer engineering at the University of California, Riverside.



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MANAGE PREFERENCES

MOST PEOPLE HAVE HEARD ABOUT THE environmental impact of today's AI boom, stemming from sprawling data centers packed with power-hungry servers. In the United States alone, the demand for AI is projected to push data-center electricity consumption to 6.7 to 12.0 percent of the nation's total by 2028. By that same date, water consumption for cooling these data-center facilities is predicted to double, or even quadruple, compared to the 2023 level.

But many people haven't made the connection between data centers and public health. The power plants and backup generators needed to keep data centers working generate harmful air pollutants, such as fine particulate matter and nitrogen oxides (NOx). These pollutants take an immediate

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Because ambient air pollution is a “silent killer.” While concerns about the public health impacts of data centers, including potential links to cancer rate increases, are beginning to surface, most AI-model developers, practitioners, and users simply aren't aware of the serious health risks tied to the energy and infrastructure powering modern AI systems.

The Danger of Ambient Air Pollution

Ambient air pollution is responsible for approximately 4 million premature deaths worldwide each year. The biggest culprit are tiny particles 2.5 micrometers or less in diameter (referred to as PM 2.5), which can travel deep into the respiratory tract and lungs. Along with high blood pressure, smoking, and high blood sugar, air pollution is a leading health risk factor. The World Bank estimates the global cost of air pollution at US \$8.1 trillion, equivalent to 6.1 percent of global gross domestic product.

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With the danger of this pollution well established, the question becomes: How much is AI responsible for? In our research as professors at Caltech and the University of California, Riverside, we've set out to answer that question.

Quantifying the Public Health Cost of AI

To ensure that AI services are available even during grid outages, data centers rely on large sets of backup generators that usually burn diesel fuel. While the total operation time of backup generators is limited and regulated by local environmental agencies, their emission rates are high. A typical diesel generator can release 200 to 600 times more NOx than a natural gas power plant producing the same amount of electricity.

A recent report by the state of Virginia revealed that backup generators at Virginia's data centers emitted about 7 percent of what permits allowed in 2023. According to the U.S.

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data centers maxed out their permitted emissions.

Further compounding the public health risk, a large set of data-center generators in a region may operate simultaneously during grid outages or grid shortages as part of demand-response programs, potentially triggering short-term spikes in PM_{2.5} and NO_x emissions that are especially harmful to people with lung problems.

Next, let's look beyond the backup generators to the supply of energy from the grid. The bulk of the electricity powering AI data centers comes from power plants that burn fossil fuels, which release harmful air pollutants, including PM 2.5 and NO_x. Despite years of progress, power plants remain a leading source of air pollution in the United States.

We calculated that training a single large generative AI model in the United States, such as Meta's Llama 3.1, can produce as much PM 2.5 as more than 10,000 round trips by car between Los Angeles and New York City.

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California's 30 million vehicles.

Why Carbon and Energy Efficiency Aren't the Whole Story

To date, efforts to mitigate AI's environmental footprint have focused mostly on carbon emissions and energy efficiency. These efforts are important, but they may not alleviate health impacts, which strongly depend on where the emissions occur.

Carbon anywhere is carbon everywhere. The climate impact of carbon dioxide is largely the same no matter where it's emitted. But the health impact of air pollution depends heavily on regional factors such as local sources of energy, wind patterns, weather, and population density.

Even though carbon emissions and health-damaging air pollutants have some shared sources, an exclusive focus on cutting carbon does not necessarily reduce, and could even

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costs by 2.8 percent.

Likewise, focusing solely on energy efficiency can reduce air pollutant emissions, but doesn't guarantee a decrease in health impact. That's because training the same AI model using the same amount of energy can yield vastly different health outcomes depending on the location. Across Meta's U.S. data centers, we've found that the public health cost of training the same model can vary by more than a factor of 10.

We Need Health-Informed AI

Supply-side solutions, such as using alternative fuels for backup generators and sourcing electricity from clean fuels, can reduce AI's public health impact, but they come with significant challenges.

Clean backup generators that offer the same level of reliability as diesel are still limited. And despite advancements in renewable energy, fossil fuels remain deeply embedded in the

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Globally, the share of coal and other fossil fuels in electricity generation has remained nearly flat over the past four decades, underscoring the difficulty of entirely changing the energy supply that powers data centers.

We believe that demand-side strategies that consider the spatial and temporal variations in health impacts can provide effective and actionable solutions immediately. These strategies are particularly well-suited for AI data centers with substantial operational flexibility. For example, AI training can often run at any available data centers and typically do not face hard deadlines, so those jobs can be routed to locations or deferred to times that have less impact on public health. Similarly, inference jobs—the work a model does to create an output—can be routed among multiple data centers without affecting user experience.

By incorporating public health impact as a key performance metric, these flexibilities can be harnessed to reduce AI's growing health burden. Crucially, this health-informed

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holds tremendous promise for advancing public health. For example, within the energy sector, AI can navigate the complex decision space of real-time power plant dispatch. By aligning grid stability with public health objectives, AI can help minimize health costs while maintaining a reliable power supply.

AI is rapidly becoming a public utility and will continue to reshape society profoundly. Therefore, we must examine AI through a public lens, with its public health impact as a critical consideration. If we continue to overlook it, the public health cost of AI will only grow. Health-informed AI offers a clear path forward for advancing AI while promoting cleaner air and healthier communities.

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Kopinski, Sara

From: Egner, Therese
Sent: Tuesday, August 19, 2025 10:02 AM
To: Kopinski, Sara
Subject: FW: Karis Critical – 1960 Lucent Lane – Case DEV-0057-025

Hi, Sara! This public comment for DEV-0057-2025 came in POD.

Therese Egner

Assistant Planner | Planning & Development - TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 420-4179 | egnert@naperville.il.us

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From: [REDACTED]
Sent: Monday, August 18, 2025 8:15 PM
To: Planning <Planning@naperville.il.us>; wehrli.s@naperville.il.us; Longenbaugh, Allison <LongenbaughA@naperville.il.us>; Holzhauser, Ian <Ian.Holzhauser@naperville.il.us>; Syed, Ashfaq <SyedaA@naperville.il.us>; Wilson, Nate <WilsonN@naperville.il.us>; Gibson, Mary <GibsonM@naperville.il.us>; Kelly, Patrick <KellyP@naperville.il.us>; McBroom, Josh <McBroomJ@naperville.il.us>; White, Benny <WhiteB@naperville.il.us>
Subject: Karis Critical – 1960 Lucent Lane – Case DEV-0057-025

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Dear Planning & Zoning Commission and City Council Members,

I'm writing as a concerned Naperville resident regarding the proposed data center development near Warrenville Road and Naperville Road. I understand there are potential economic benefits of such a project, and I also believe it's essential to carefully consider the long-term impact on our community's quality of life, infrastructure, and cost of living.

Noise Concerns Data centers are known to produce significant noise from backup generators, rooftop chillers, and HVAC systems. In nearby Aurora, residents living near the CyrusOne facility have reported persistent noise disruptions, including vibrations and sleepless nights. Noise carries, and as a resident of North Naperville, I already hear a great deal of noise, even at night, just from traffic both near and distant, so additional noise from a data center is a realistic concern.

- Could a detailed **Noise Impact Assessment** be conducted for this site? Including information on how far the sound carries? And comparative data to help parties understand the true effect.
- Will **backup generators** be tested regularly, and if so, during what hours?
- How often will the facility need to run its own power generators, and for how long each time?
- Are **chillers and HVAC units** planned for outdoor installation?
- What **sound mitigation strategies** (e.g., acoustic wraps, sound walls) will be implemented, and what research is there to support how successful they are?

Electricity Usage Data centers consume enormous amounts of electricity, which can strain local grids and potentially raise rates for residents. I understand the city has approved a study to assess grid impact.

- What is the **estimated electricity demand** at full capacity? How does that compare to the business that was previously at this location?
- Will the developer contribute a sufficient amount to **grid upgrades or renewable energy offsets**?
- Could this project affect **residential utility rates** or delay sustainability goals?
- Could this project result in residents experiencing periods of power loss or reduction of power available?

Water Consumption Cooling systems can use millions of gallons of water daily, raising concerns about sustainability and environmental impact.

- Will the facility use **evaporative cooling**, or more efficient alternatives like **liquid or immersion cooling**?
- What is the **projected daily water usage**, and how will wastewater be handled?
- Because water use in data centers is potentially unusually large, could a **Water Impact Assessment** be conducted, and are there **conservation plans** in place?
- Does Naperville's current **contractual allocation of Lake Michigan water** allow for this level of industrial usage?
- Will our water and sewer systems need upgrades to handle the large flow of water and wastewater? If so, will the developer contribute a sufficient amount toward those upgrades?
- Could the data center's water demand lead to **restrictions on residential water use** during peak periods or drought conditions? Or lead to increases in residential water and sewer rates?

I strongly urge the city to require full transparency from the developer and to prioritize the health, peace, and sustainability of our neighborhoods. I appreciate the opportunity to attend future public hearings and stay informed about this project's progress.

Thank you for your time and consideration.

Sincerely,
Kathy Kirman

Kopinski, Sara

From: Egner, Therese
Sent: Tuesday, August 19, 2025 10:02 AM
To: Kopinski, Sara
Subject: FW: Formal Request to Negotiate a Community Benefits Agreement for the Karis Critical Data Center Project (Case # DEV-0057-2025)

Hi Sara, this public comment for DEV-0057-2025 came in POD!

Therese Egner

Assistant Planner | Planning & Development - TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 420-4179 | egnert@naperville.il.us

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From: Jeesun Lim <[REDACTED]>
Sent: Tuesday, August 19, 2025 9:37 AM
To: Planning <Planning@naperville.il.us>
Subject: Formal Request to Negotiate a Community Benefits Agreement for the Karis Critical Data Center Project (Case # DEV-0057-2025)

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Dear Mr. Whitaker,

I am writing to you as a resident of Naperville whose home is immediately adjacent to the property at 1960 Lucent Lane, the proposed site for the Karis Critical Data Center Campus (Case # DEV-0057-2025).

I am deeply concerned about the disruptions and long-term impacts it may have on the quality of life for residents living near the construction site and the operational data center.

To address these concerns, I respectfully request that the following measures be considered and implemented to compensate and mitigate the impacts on our community:

1. Noise Reduction Measures:

- Installation of noise barrier fences around the data center perimeter to minimize noise pollution.
- Provision of soundproofing materials, such as double-glazed windows, for nearby residences.
- Implementation of noise-reducing technologies for HVAC systems and other equipment to ensure minimal disturbance.

2. Landscaping and Aesthetic Improvements:

- Enhanced landscaping around the data center, including planting trees, shrubs, and other vegetation to maintain the aesthetic appeal of the neighborhood.
- Design modifications to the data center buildings to ensure they are visually compatible with the surrounding residential area, using appropriate colors and materials.
- Measures to reduce light pollution, such as shielding outdoor lighting and minimizing nighttime glare.

3. Protection of Property Values - To safeguard our single largest investment, we propose:

- **A Property Value Guarantee Program**, including independent appraisals before and after construction, with a formal mechanism for compensating homeowners for any decline in property value.
- **A Guaranteed Purchase Offer Program** for residents who wish to sell their homes within a set period following the data center's completion.

4. Public Contributions and Infrastructure Investments:

- Allocation of funds from the data center project to improve local public amenities, such as schools, libraries, and parks.
- Investment in traffic management and road improvements to handle increased traffic associated with the data center.
- Creation of a community fund specifically for residents affected by the project, to be used for local initiatives or improvements.

5. Minimization of Construction Impact:

- Limitation of construction hours to minimize disruption to daily life (e.g., 8:00 AM to 5:00 PM, Monday through Friday).
- Implementation of dust and vibration control measures during construction to protect nearby homes.

- Designation of specific routes for construction vehicles to reduce traffic congestion in residential areas.

6. Transparency and Accountability: To ensure these commitments are met, we require:

- A commitment to annual public reporting on compliance with all terms of a Community Benefits Agreement (CBA), with financial penalties for non-compliance.

I believe these measures are reasonable and necessary to ensure that the benefits of this development are balanced with the well-being of our community. I urge you to work with Karis Critical to incorporate these requests into the project plan and to involve the community in the planning process to foster transparency and collaboration.

Thank you for your attention to this matter. I look forward to your response and am available to discuss these concerns further at your convenience.

Best Regards,

Jeesun Lim at [REDACTED]

Kopinski, Sara

From: Egner, Therese
Sent: Wednesday, August 20, 2025 9:07 AM
To: Kopinski, Sara
Subject: FW: Public Comment re: DEV-0057-2025

Hi Sara, this public comment came into POD for DEV-0057-2025.

Therese Egner
Assistant Planner | Planning & Development - TED Business Group City of Naperville | 400 S. Eagle St. Naperville, IL 60540
(630) 420-4179 | egnert@naperville.il.us

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-----Original Message-----

From: Grace Chen <[REDACTED]>
Sent: Tuesday, August 19, 2025 9:48 PM
To: Planning <Planning@naperville.il.us>
Subject: Public Comment re: DEV-0057-2025

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To whom it may concern:

As a resident who values clean air, green spaces, and a livable future for the next generation, I feel compelled to speak out against the proposed construction of new data centers in our community.

While I recognize the growing demand for digital infrastructure, we must not ignore the environmental consequences of these facilities. Data centers consume enormous amounts of electricity, often sourced from fossil fuels, and contribute significantly to greenhouse gas emissions. At a time when we should be accelerating our efforts to combat climate change, approving energy-intensive developments like this feels counterproductive.

Beyond energy use, data centers require vast quantities of water for cooling, which can strain local resources and ecosystems. The noise pollution, land disruption, and potential harm to wildlife are additional concerns that deserve serious attention.

I urge decision-makers to pause this proposal until a comprehensive environmental impact assessment is conducted and shared with the public. We need transparency, accountability, and a clear commitment to sustainability before moving forward.

Our community should be a leader in climate-conscious development. Let's make choices that reflect our values and protect the environment for generations to come.

Sincerely,
Grace Chen

Kopinski, Sara

From: Egner, Therese
Sent: Wednesday, August 20, 2025 9:05 AM
To: Kopinski, Sara
Subject: FW: DEV-0057-2025

Hi, Sara! This public comment for DEV-0057-2025 came in.

Therese Egner

Assistant Planner | Planning & Development - TED Business Group
City of Naperville | 400 S. Eagle St. Naperville, IL 60540
(630) 420-4179 | egnert@naperville.il.us

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From: Eso <[REDACTED]>
Sent: Tuesday, August 19, 2025 10:09 PM
To: Planning <Planning@naperville.il.us>
Subject: DEV-0057-2025

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Hello,

I am a Naperville resident born and raised. I am writing to submit a comment about DEV-0057-2025. I am strongly opposed to this development.

Data centers produce a continuous hum from the electronics within, often exceeding 60 decibels. The effects of constant noise pollution are well documented to be extremely bad for human health and for the wildlife.

Data centers draw an immense amount of energy, driving up the cost of electricity. In the Southwest, similar data centers have already driven up energy rates by 17% over the past decade.

Back-up generators pollute the air, and the water consumption requirements strain our infrastructure.

The construction would degrade the quality of life of the nearby residents, the nearby nature preserve, and our city. Please don't prioritize industry over people.

Thanks,
Jessica Ni

Name	Tom Akers
City/State	Wheaton, IL
Group/Organization	No
Board/Commission	Building Review Board
Meeting Date	09/03/2025
Participation Type	Comment Only
Comment Only - Agenda Item	Case #: DEV-0057-2025
Comment Only - Comment	<p>This comment is for the Planning and Zoning Commission.</p> <p>I believe the approval of the zoning variances proposed by this request should be tabled, pending review of both environmental impact, and strain on the electrical grid.</p> <p>The adjacent DuPage County Forest Preserves are a vital part of the community; we must ensure that they suffer no environmental impact. In addition, as a former employee in the electric generation and transmission industry, I need to point out the importance of studying, and publicly disseminating, impact studies to the local electric grid.</p> <p>Thank you for attention in this matter.</p> <p>Your impacted neighbor in Wheaton,</p> <p>Tom Akers</p>
Support/Oppose	
Support/Oppose - Agenda Item	

Name: **Tom Akers**

Email: [REDACTED]

Phone: [REDACTED]

Acknowledgement: **Acknowledge Yes**

Kopinski, Sara

From: Planning
Sent: Wednesday, September 3, 2025 1:51 PM
To: Kopinski, Sara
Subject: FW: 1960 Lucent Lane

Adam Beaver, AICP

Community Planner | Planning & Development - TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 420-4193 | beavera@naperville.il.us

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From: Ari <[REDACTED]>
Sent: Wednesday, September 3, 2025 11:52 AM
To: Planning <Planning@naperville.il.us>
Subject: 1960 Lucent Lane

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Hello, I would like the following comments to be added to the case file for 1960 Lucent Lane file # 25-1103B.

My name is Ari and I utilize the forest preserves and enjoy the serenity and beauty they bring to the city of Naperville. I am deeply concerned that Naperville is considering this request for a data center and fully reject this idea as it poses several threats from an environmental standpoint and to the surrounding community.

Environmental Impact: Data Centers have a negative impact on the environment any way you look at it. Oftentimes, data centers do not disclose the full weight of the strain they put on the surrounding environment. I do not see that an environmental assessment was conducted to determine the impact this has on wildlife and the ecosystem of our forest preserves.

One of the biggest threats data centers have is their extreme consumption of fresh water resources. Whether using local or imported fresh water, this is a direct strain on vital fresh water resources from our planet making this data center a threat to the overall environment and well being of our planet. At a time when climate change is already having disastrous impacts, limiting our carbon footprint is critical.

Health Impact: Furthermore, the proposed diesel generators also put the health of the community at risk. Diesel particulates from generators are known to cause asthma and cancer. There has not been a health risk assessment done that would detail the impact that these generators would have on the community.

Data centers provide little to no benefits for communities. They are loud, they disrupt ecosystems, put a strain on fresh water resources, pollute the environment, and do not create any jobs for local members (these jobs are often highly specialized and don't hire community members).

I urge you to listen to the constituents of this community and VOTE NO on this proposal.

Thank you,
Ari

<https://www.eesi.org/articles/view/data-centers-and-water-consumption>

<https://climate.sustainability-directory.com/question/how-do-data-centers-impact-water-resources/>

<https://blockclubchicago.org/2025/08/28/the-great-lakes-could-be-at-risk-due-to-data-centers-powering-ai-study-warns/>

Kopinski, Sara

From: Planning
Sent: Wednesday, September 3, 2025 1:51 PM
To: Kopinski, Sara
Subject: FW: Proposed Data Center in Naperville

Adam Beaver, AICP

Community Planner | Planning & Development - TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 420-4193 | beavera@naperville.il.us

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From: Sarah Bee <[REDACTED]>
Sent: Wednesday, September 3, 2025 12:21 PM
To: Planning <Planning@naperville.il.us>
Subject: Proposed Data Center in Naperville

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Dear City Council,

I feel like many of us would have an issue with this project for a multitude of reasons, so let me touch on a few that are personal to me. We get one Earth, and it's important to protect what is left of it for future generations in the lush natural beauty it offers.

Building and sustaining something this large will create issues such as: Large amounts of E-Waste, soil pollution during construction, air pollution, water and electricity shortage (and price surge) for the surrounding area, and local job displacement.

The jobs that this creates would mainly be specialty IT jobs in which outside help would be required, thus lacking in job availability for the local community.

The noise that this will produce both from construction and from the facility itself will disrupt local wildlife who reside in the nearby forest preserves which lie 2-5 miles away from the building site as well as residents in the local area who live less than a mile from the site.

This data center will ruin this location and prevent people from wanting to live in the area, as well as disrupt the lives of locals, and raise prices of water and electricity. This CAN NOT be allowed to happen. This world does not need more garbage, it needs more environmental protection and mindfulness in it's decisions.

Questions to consider:

Has an environmental impact study and a health assessment been completed for this project?

Where do you intend to draw the water from and where do you plan to release the water used for the cooling systems?

How will you safely dispose of E-waste without impacting the environment?

Why wasn't the local community involved or informed before this was proposed?

Signed with Emotional Duress,
Sarah Bergrud

Get [Outlook for Android](#)

Kopinski, Sara

From: Planning
Sent: Wednesday, September 3, 2025 1:51 PM
To: Kopinski, Sara
Subject: FW: REJECT Data Center Proposal DEV-0057-2025

Adam Beaver, AICP

Community Planner | Planning & Development - TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 420-4193 | beavera@naperville.il.us

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From: Jen Banowetz <[REDACTED]>
Sent: Wednesday, September 3, 2025 12:46 PM
To: Planning <Planning@naperville.il.us>
Subject: REJECT Data Center Proposal DEV-0057-2025

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Dear PZC Board Members,

The data center proposal for the Nokia property is hard to fathom. Simply put, it would be detrimental to this area.

The petitioner has provided no details on many critical factors, including power source and demand; environmental impact; as well as noise, air, and water pollution. No

specifics, no data. They are proposing a carte blanche plan for their "boutique data center" and asking you to approve it.

We are not fooled. Based on similar local projects, a data center like this could require dozens and dozens (48) of backup generators that would require an underground diesel supply (125K gallons, for example). That's a lot. That's a train yard of locomotives. While the generators may not be called upon to power the data center, they are required to be tested for several hours on a regular basis (once a week is a typical industry standard). All of them.

Here are just a few articles describing the affects an Aurora neighborhood near a data center is being forced to endure:

<https://www.chicagotribune.com/2025/08/11/residents-near-cyrusone-data-center-in-aurora-concerned-about-noise/>

Here's what neighbors of that facility are saying: "Laura Evans, a resident of the nearby Palomino Springs neighborhood, said that she and some of her neighbors would describe the noise coming from the data center during the repairs in April as being like a helicopter was landing on her roof. Paul Jaskowiak, who lives in the same neighborhood, said it sounded to him like a diesel truck was idling just outside his house, but it just never went away."

<https://www.chicagotribune.com/2025/08/21/cyrusone-in-aurora-again-warns-of-upcoming-generator-use-for-repairs-friday/>

"Last week, CyrusOne offered to reimburse residents living on Molitor Road, Harris Drive, Jeanel Lane, Merle Drive, Palomino Drive, Shetland Lane or Clara Avenue for the cost of an overnight stay in an Aurora hotel during that round of repairs."

How could such a project—this proposed data center ("boutique" or not)—even be seriously considered for this unique parcel? It clearly would have severe negative consequences for the adjacent forest preserves (Herrick and Danada), multiple residential neighborhoods (some 50 years old, some brand-new touted by the city), the nearby sensory playground no less, not to mention the numerous companies doing business in this corridor. This is a quality of life issue.

And why this project in the first place? Don't buy the economic hype. The economic "benefits" of such a project are also murky and elusive.

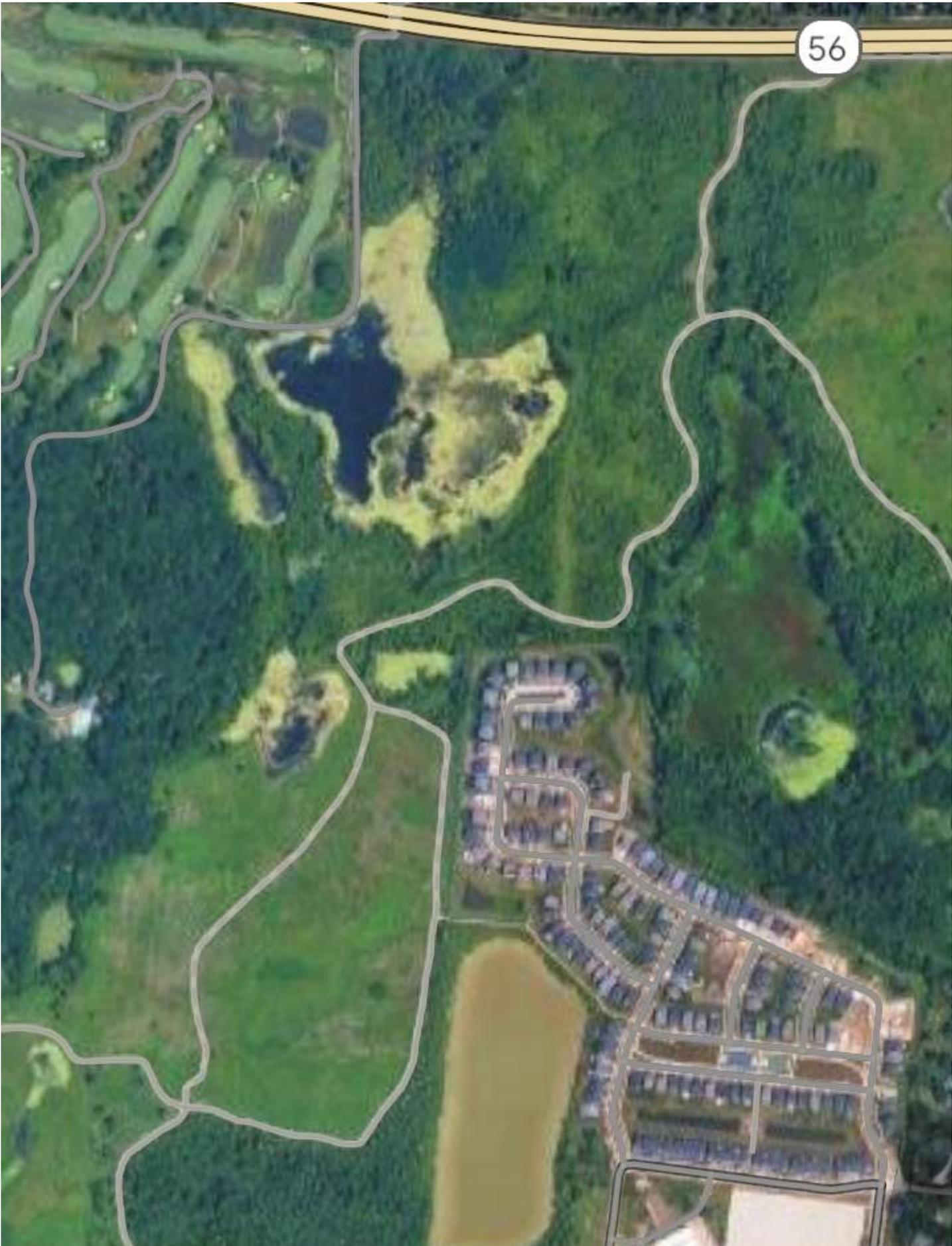
As reported in Time magazine, "Why Tax Breaks for Data Centers Could Backfire on States/Data center tax breaks have swelled to billions of dollars in lost revenue a year, a new study" (<https://time.com/7280058/data-centers-tax-breaks-ai/>): "Data centers do not provide long term jobs or serve local businesses. Data centers typically employ just a few dozen workers, which pales in comparison to factories of similar sizes. "The local community is left footing the bill for big, national companies that generate economic activity elsewhere."

Even so, the most important question you must ask yourselves—would you enjoy living, recreating, and working near such a loud and untested behemoth? Is this why you

choose Naperville as your home? Of course not. So please reject this very unreasonable project in its entirety.

Thank you for your volunteer time, expertise, and consideration.

Best,
Jen Banowetz
24-year resident of Fairmeadow Neighborhood



Kopinski, Sara

From: Iwicki, Brad
Sent: Thursday, September 4, 2025 11:30 AM
To: Kopinski, Sara
Subject: FW: Please Vote No - Karis Critical Data Center

POD – Public Comment – Data Center

Brad Iwicki

Assistant Planner | Planning & Development – TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 305-7021 | iwickib@naperville.il.us

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From: Maggie Romanovich <[REDACTED]>
Sent: Wednesday, September 3, 2025 7:17 PM
To: Planning <Planning@naperville.il.us>
Subject: Please Vote No - Karis Critical Data Center

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Hi there,

I am a resident of Wheaton but am likely closer to the proposed lot than many of the Naperville residents you represent. I strongly urge you, for the sake and safety of our community, our water supply, our electrical grid, and our health, to vote no on this data center. There have been zero news stories that speak to the success of the community once a data center has moved in. In fact, many stories speak to the opposite. In addition, there are very few jobs that are generated from an automated center like this.

Please vote no and keep our community safe and enjoyable.

Thank you,
Maggie Romanovich

Subject: Opposition to Case DEV-0057-2025 – Karis Critical Data Center Proposal

Dear Members of the Naperville Planning & Zoning Commission,

On behalf of the Danada Woods Townhome Association, I write to express our strong opposition to Case DEV-0057-2025, the application by Karis Critical, LLC to construct two 211,000-square-foot data center buildings on the former Nokia property.

Based on substantial evidence, including local and national reporting, we believe this proposal poses irreversible risks to public health, the environment, and quality of life — and directly conflicts with **Naperville’s Land Use Master Plan**.

Inconsistency with Naperville’s Land Use Master Plan

- **Future Land Use:** The city’s plan designates the parcel for residential development, not commercial or industrial use.
 - **Neighborhood Compatibility:** Data centers are noisy, resource-intensive, and fundamentally conflict with the residential character of Danada Woods and nearby neighborhoods.
 - **Policy Alignment:** Approving this project would contradict **Naperville’s planning framework** and set a harmful precedent for future development.
-

Environmental & Health Risks

- **Air Pollution:** Backup diesel generators emit nitrogen oxides and particulate matter linked to asthma, cardiovascular disease, and cancer. Nationally, data center expansion in the past five years has generated an estimated **\$5.4 billion in U.S. public health costs**.
- **Noise Pollution:** Data centers produce constant HVAC and generator noise that can exceed **80 dBA** (comparable to a leaf blower), causing sleep disturbance, stress, and cardiovascular risks. Such noise also disrupts wildlife in the adjacent **Danada Forest Preserve**.
- **CyrusOne Aurora Example:** Following a transformer fault, extended generator use forced nearby residents to endure severe noise and fumes. Permanent sound walls are now being built, and residents were temporarily relocated ([Chicago Tribune, Aug. 2025](#)).
- **Water & Climate Impact:** Industrial-scale data centers can consume **millions of gallons of water per day** for cooling and contribute heavily to greenhouse gas emissions. Karis Critical has provided no disclosure of its intended cooling methods.

Housing & Community Planning Conflicts

- The Nokia property lies in an area designated for **medium-density housing**. Naperville has already advanced projects like **Naper Commons** and **Northwoods of Naperville**, which expand residential opportunities, stabilize tax revenue, and enhance neighborhood vitality.

- Inserting an industrial data center would fracture residential continuity, depress property values, and undermine decades of intentional planning.
- Naperville faces a documented **housing shortage**:
 - As of January 2025, only **1.7 months of housing supply** existed, far below the 6 months required for a balanced market.
 - Only **7.5% of Naperville’s housing stock qualifies as affordable**, below the state-mandated 10%. The city needs **1,263 more affordable units immediately** and as many as **13,000 by 2040**.
- Devoting scarce residential land to a speculative data center directly undermines these housing needs.

Economic Risks & Vacancy

- While Karis projects \$3M in annual tax revenue, comparable projects show data centers provide **few permanent jobs** and impose **hidden costs** in infrastructure, health, and quality-of-life impacts.
- The demand for data centers is being fueled by an **AI investment bubble**, which industry leaders have warned may collapse ([Financial Times, 2025](#); [MSN/Alibaba, 2025](#)). If this occurs, Naperville risks being left with obsolete, windowless shells — much like the Nokia site has already remained vacant for nearly two decades.

Our Request: Protect the Community, Deny the Proposal

The documented harms — air pollution, noise, water use, fire risk, habitat destruction, housing displacement, and speculative volatility — far outweigh any potential fiscal gain. This proposal is inconsistent with Naperville’s Master Plan and undermines the city’s long-term interests.

We therefore urge the Planning & Zoning Commission to **deny Case DEV-0057-2025 in its entirety**. No conditions or variances can mitigate the permanent damage this project would cause to the health, safety, and quality of life of Naperville residents.

Thank you for your time and thoughtful consideration.

Sincerely,
Bill Nestel
 President
 Danada Woods Townhome Association

Sources & References

CyrusOne Aurora – Transformer Fault, Noise, Community Action

- <https://www.cyrusone.com/data-centers/north-america/aurora-il-back-up-generator-schedule>
- <https://www.chicagotribune.com/2025/08/13/aurora-cyrusone-data-center-repair-update/>

- <https://www.chicagotribune.com/2025/08/11/residents-near-cyrusone-data-center-in-aurora-concerned-about-noise/>
- <https://www.aurora.il.us/News-articles/CyrusOne-Data-Center-Repairs>
- <https://www.aurora.il.us/News-articles/UPDATE-CyrusOne-Data-Center-Repair>

Data Center Cooling & Water/Energy Use

- <https://blog.enconnex.com/data-center-liquid-cooling-vs-air-cooling>
- <https://www.techtarget.com/searchdatacenter/feature/Liquid-cooling-vs-air-cooling-in-the-data-center>
- <https://www.parkplacetechologies.com/blog/data-center-liquid-cooling-vs-air-cooling/>
- <https://teamsilverback.com/data-center-cooling-liquid-vs-air/>
- <https://learn-more.supermicro.com/data-center-stories/direct-liquid-cooling-vs-traditional-air-cooling-in-servers>
- <https://www.lg.com/global/business/hvac-blog/data-center-air-vs-liquid-which-way-to-the-future>
- <https://www.nvent.com/en-iq/mission-critical/data-center-operators-switch-liquid-cooling-why>
- <https://www.boydcorp.com/blog/energy-consumption-in-data-centers-air-versus-liquid-cooling.html>
- <https://www.vertiv.com/en-us/solutions/learn-about/liquid-cooling-options-for-data-centers/>
- <https://blog.equinix.com/blog/2024/09/19/how-data-centers-use-water-and-how-were-working-to-use-water-responsibly/>

Housing & Community Impacts

- <https://www.dupageforest.org>
- <https://www.ft.com/content/7052c560-4f31-4f45-bed0-cbc84453b3ce>
- <https://www.msn.com/en-us/money/other/beware-a-swelling-bubble-in-ai-data-centers-alibaba-chairman-says/ar-AA1BDhJQ>
- <https://www.illinoispolicy.org/reports/regulatory-reform-can-make-housing-more-affordable-for-illinois-families/>

Why the Karis Data Center Is the Wrong Fit for Naperville—Energy & Water Risks for Families

Where & What

1960 Lucent Lane—two large data centers seeking a conditional use (DEV-0057-2025). Full public hearing Sept 3, 2025.

Electricity Impact

- Naperville's 2024 peak: 347 MW. A single campus could average 31–66 MW, equaling ~9–19% of our city's peak—about 27,000–57,000 homes worth of electricity.
- U.S. Department of Energy (DOE) and Lawrence Berkeley National Laboratory (LBNL) project that data-center demand could reach 6.7–12% of all U.S. power by 2028, straining grids and driving costs.

Water Impact

- Naperville uses ~13 MGD of Lake Michigan water under a court-limited allocation.
- Hyperscale data centers can consume 365 million gallons per year (~1 MGD), equal to 12,000 residents' use. By 2030, hyperscale centers could withdraw 150 billion gallons—equal to 4.6 million households.
- With evaporative cooling, over 50% of the water is lost forever to the watershed.
- 97% of data centers buy from municipal supplies, often groundwater, but less than one-third track or report usage.
- Electricity itself carries a hidden water cost—power plants consume water, adding to the footprint.

Great Lakes Risks: Why This Matters to Naperville Families

- Only 1% of Great Lakes water is renewed each year. Between 20–40% of its budget is groundwater, and 40–75% of residents rely on groundwater for drinking water.
- Over-pumping aquifers is already causing land subsidence (sinking) in Chicago, Detroit, and Indianapolis (2mm/year), threatening water supply and infrastructure.
- Conflicts over groundwater are happening now in Michigan, Wisconsin, and Indiana. Illinois communities like Joliet already face aquifer depletion and rely on Chicago for emergency Lake Michigan water sales.
- There are no binding conservation standards for the data center industry.

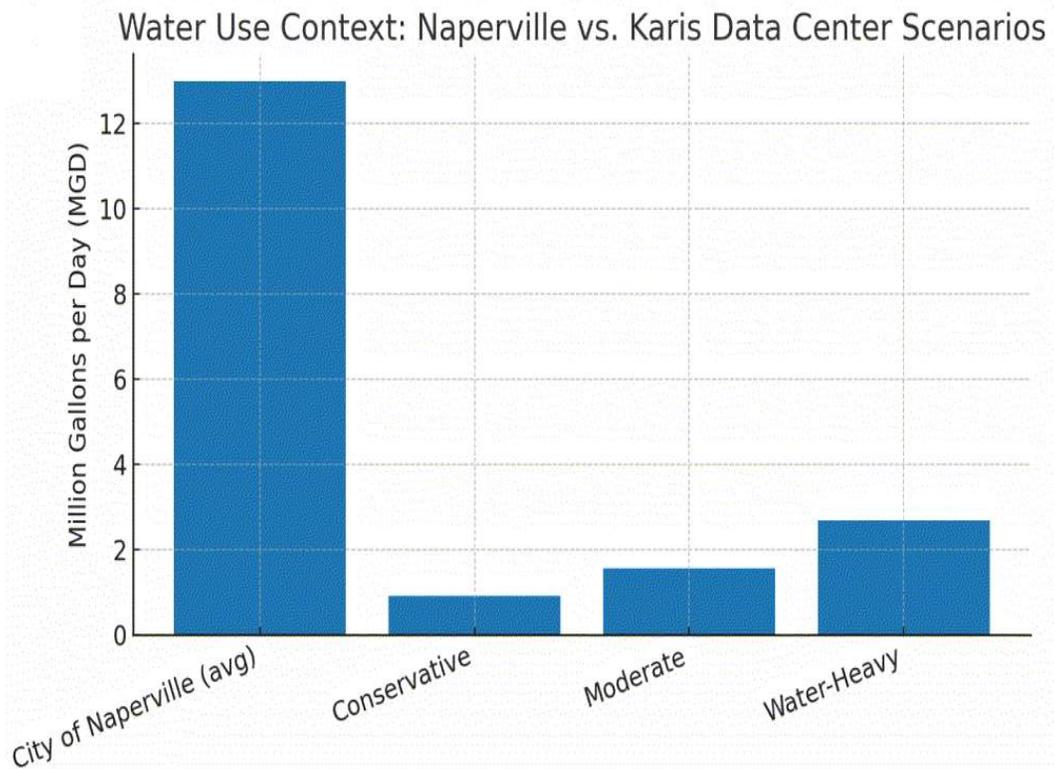
What This Means for Residents

- Bigger bills & reliability risks: Large, continuous loads increase costs and stress the grid during heat waves.
- Finite supply: Lake Michigan water is limited by Supreme Court decree. Household needs must come first.

Our Ask to the Commission

- 1) Deny the conditional use; or 2) Require safeguards: • No potable water for cooling—use reclaimed/closed-loop only.
- Full disclosure of energy & water use with public reporting.
- Binding efficiency standards (PUE, WUE) and curtailment commitments.
- State and city oversight before capacity is approved.

Visual Comparison: Water Use



Naperville's average daily water use is ~13 MGD. Depending on cooling design, the Karis Data Center could add 0.9–2.7 MGD—equivalent to 7–20% of Naperville's total daily use.

Why the Karis Data Center Is the Wrong Fit for Naperville

Energy & Water Risks for Families
Public Hearing – Sept 3, 2025

1

Electricity Impact

- Naperville's 2024 peak: 347 MW.
- Karis campus could average 31–66 MW → 9–19% of city peak (~27k–57k homes).
- DOE & LBNL: Data centers could reach 6.7–12% of all U.S. power by 2028.

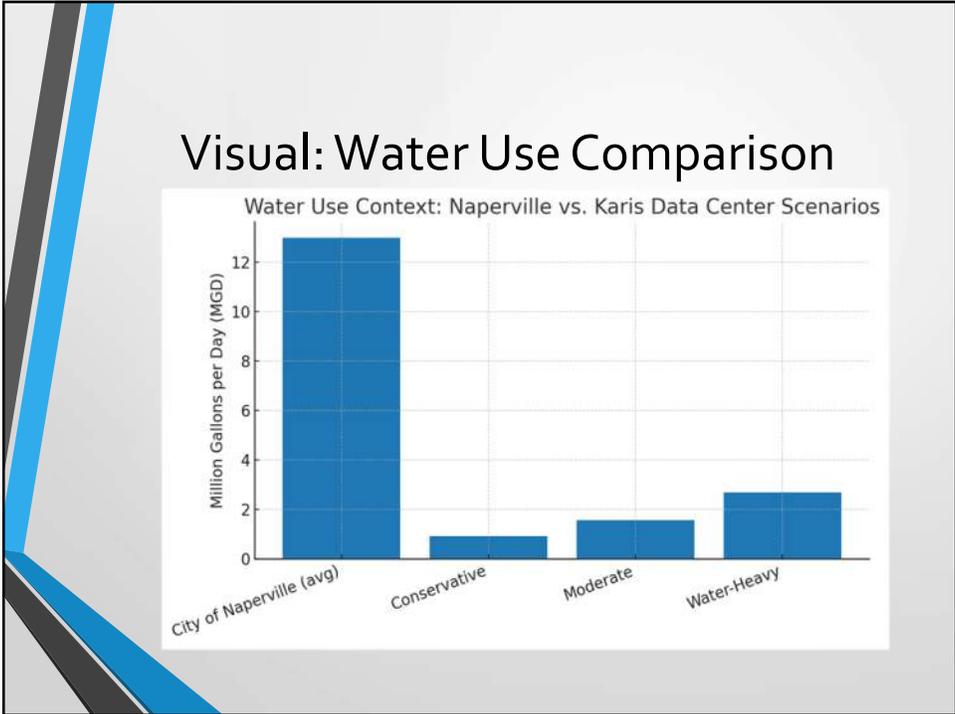
Approving w/o confirming massive baseload is a Risk to Residents

2

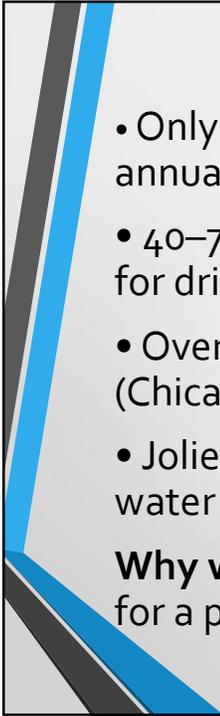
Water Impact

- Naperville average water use: 13 MGD (court-limited Lake Michigan supply).
- Hyperscale Data centers can consume 365M gallons/year (~1 MGD) =12K residents.
- By 2030, centers could withdraw 150B gallons (equal to 4.6M households).
- >50% of evaporative cooling water is permanently lost.

3



4



Great Lakes Risks

- Only 1% of Great Lakes water renewed annually.
- 40–75% of residents rely on groundwater for drinking water.
- Over-pumping → land subsidence (Chicago, Detroit sinking 2mm/year).
- Joliet aquifer depleted – now forced to buy water from Chicago.

Why would Naperville put Families at risk for a project with high consumptive use?

5



Cooling System Comparison

Electricity • Water • Noise

6

Comparison Table

System	Electricity (kW/ton)	Water (gal/ton-hr)	Noise (dBA)	Key Notes
Direct Evaporative	0.05–0.15	2–4	55–65	Low power, high water, quiet
Closed-Loop Dry	0.80–1.20	0	70–85	No water, highest power, loud
Closed-Circuit Evap	0.45–0.75	1.5–3.0	65–75	Balanced trade-offs

7

Our Ask to the Commission

- 1) Deny the conditional use; or
- 2) Require safeguards:
 - No potable water for cooling (reclaimed/closed-loop only).
 - Full disclosure of energy & water use with public reporting.
 - Binding efficiency standards (PUE, WUE) & curtailment commitments.
 - **Oversight before approving capacity.**

8

Fairmeadow Neighborhood Association
25W213 39th St.
Naperville, IL 60563

August 27, 2025

Naperville Planning and Zoning Board
Naperville Municipal Center
400 S. Eagle Street
Naperville, IL 60540

Dear Members of the Planning and Zoning Board,

On behalf of the Fairmeadow Neighborhood Association, I am writing to formally express our strong opposition to the proposed development of a data center near our residential community.

While we recognize the importance of technological infrastructure and economic impact of the proposed facilities utility taxes, we believe this particular project poses significant risks and concerns that directly impact the health, safety, and quality of life of our residents. We believe that a data center of this scale is better suited for industrial zoning than ORI (Office, Research AND Light Industry) and further does not belong in close proximity to residential neighborhoods.

Our primary concerns include:

1. **Data Center Scale:** The proposed data center, while not the largest in the Chicago land area, would be in the top 15 based on power use. In reviewing the zoning of a large number of data centers in the area, almost all data centers that have been built in the last 10 years are in industrial zoning areas. There are a number of older data centers that are of much smaller scale having a far smaller square footage, power (<10 MW), cooling, and generator (Less than 6 generators) footprint than the proposed (73 MW) facility that are in light industrial or commercial zoned areas. Smaller scale lower power footprint data centers constructed more than 10 years ago are more appropriate for ORI – Light Industrial zoning the data centers of the proposed scale.
2. **Noise Pollution:** Data centers operate continuously and often rely on large-scale cooling systems and backup generators, which can produce persistent and disruptive noise. This is incompatible with the quiet, residential character of residents living close to the proposed facility. Noise concerns are not limited to backup generators that may only run during power outages and routine testing but also the constant hum of electrical substation and cooling fans. The amount of cooling required has a direct relation to the power consumption of the overall power usage of the facility as energy used by the computers is turned to heat that has to be removed from the facility.

Data Center noise risk is an emerging area of study due to the explosive expansion of the number and scale of data center facilities.

- <https://pmc.ncbi.nlm.nih.gov/articles/PMC12273412/>
- <https://hsph.harvard.edu/news/noise-can-harm-your-health-even-if-you-sleep-through-it/>

In other parts of the country such as in Prince William County, Virginia, the municipalities and residents have been struggling with the noise-related issues for some time. Data centers that were built more than 7-10 years ago did not have the same noise profiles of data centers built today. Data center noise is additive to existing background noise and will increase the overall background noise of the area and the low-frequency noise that is generated has not been well studied and can be heard for miles away from the data center facilities. While there are hundreds of news stories in the last few years about data center noise-related issues in Prince William County, many highlight the need to change zoning and noise ordinances after the fact. When hundreds of millions of dollars and residents' health are on the line a wait and see approach does not work.

- https://www.princewilliamtimes.com/news/coming-crackdown-on-data-center-noise-likely-wont-bring-relief-to-a-community-most-affected/article_5307ae6c-fac1-11ef-89ef-13f721478913.html
- https://www.insidenova.com/headlines/prince-william-outlines-noise-ordinance-update-with-data-centers-a-priority/article_1cd3b2cc-ac4c-425b-8824-7041e40d13a6.html

The noise has been a recent local concern at the CyrusOne data center in Aurora. While the original data center building that has been in operation for many years had not been an issue. The issues started with the 2024 construction of the new building that was built with higher power densities similar to the proposed design and square footage but with a smaller power footprint (53MW vs 73 MW) to the proposed data center. It is important to note this issue is large enough that the data center provider is willing to pay for residents to stay in hotels when the generators are running. The Aurora residents are significantly further away than the townhomes on Weatherbee Lane in the proposed data center.

<https://www.chicagotribune.com/2025/08/21/cyrusone-in-aurora-again-warns-of-upcoming-generator-use-for-repairs-friday/>

<https://www.chicagotribune.com/2025/08/11/residents-near-cyrusone-data-center-in-aurora-concerned-about-noise/>

<https://www.cyrusone.com/data-centers/north-america/aurora-il-back-up-generator-schedule>

- Air Quality and Generator Exhaust:** The use of diesel-powered backup generators raises serious concerns about air pollution, particularly the release of harmful exhaust emissions during testing and operation. This poses a health risk to nearby families, especially children and the elderly. Each building of the proposed facility will have 20 to 24 diesel generators capable of producing 2-3 MW (Megawatts) of power. Individual generators are similar in size to the diesel engines in a train locomotive. There has been a large amount of research on diesel exhaust and the effects on people that has led to regulations from federal and state Environmental Protection Agencies and Occupational Safety and Health Administrations.

On a hot summer evening when the power is out, residents will be unable to open windows due to the deafening noise, vibrations, and large quantity of diesel exhaust from a minimum of half of the locomotive-sized diesel generators (40-48 total) in the facility running. Their homes will be uninhabitable during these inevitable power outage events that may become more frequent with the strain that these facilities put on the power grid.

Due to the size and scale of generator exhaust, this type of facility is more compatible with industrial zoning where generators are located further from residences.

- Diesel Fuel Storage Safety and Environmental Risk:** Storing large quantities of diesel fuel near homes introduces the potential for leaks, spills, fires, and other environmental hazards. The Illinois Environmental Protection Agency currently limits gas stations to 12,000 gallons of fuel onsite. Each generator will consume 130 to 190 gallons of fuel per hour. The fully built-out facility with 40-48 generators will likely see a minimum of 20-24 generators running during an outage with 2680 to 4560 gallons of fuel being consumed per hour with 64,000 to 109,000 gallons of fuel being stored onsite for 24 hours of operation.

Storing a large quantity of fuel has risk for fire and spills, this can increase during refueling, periodic fuel polishing, and fuel tank cleaning operations. The risk of groundwater contamination and soil degradation is unacceptable in a residential setting. Our neighborhood, which is situated 700 feet from the proposed facility, is reliant on individual homeowners' well water and a large diesel leak would be tragic to our neighborhood.

We are unable to find a facility in Naperville that would have similar amounts of fuel stored onsite and may be a unique challenge for fire department personnel in dealing with fire or spill related accidents.

We believe that the fuel storage requirement alone constitutes this to better fit in an industrial facility.

- Battery Fire Risk:** Data centers rely on UPS (Uninterruptible Power Supply) systems that sit in between the computer systems and the utility and generators to provide

continuous power when there are power issues while the generator starts and is able to provide power. The UPS systems have large banks of batteries that are accustomed to handle the full power load for approximately 15 minutes until generator power is able to be used. These UPS systems have strings of many large batteries that have unique ventilation, storage, and risks associated with them. Older data centers would use lead acid type batteries similar to car batteries and had significant maintenance and safety issues as they generate hydrogen and oxygen during charging and discharging and have been long known to be the source of fires. Modern data centers utilize nickel-based batteries or more common lithium-ion batteries. Lithium-ion batteries have become a preferred battery as they have lower maintenance and longer life than other battery types. However, lithium-ion is known to pose fire hazards that are catastrophic and difficult to contain. Large quantities of these batteries possess a large fire risk. The proposed facility will require local firefighters to invest in extra training and equipment in the case of a fire. It is well known that it is a struggle to extinguish electric vehicle fires because the scale of the facility would be hundreds of times the lithium than a single electric vehicle.

- <https://www.hka.com/article/navigating-data-centre-fire-protection-understanding-lithium-ion-li-ion-battery-hazards/>
- <https://www.datacenterdynamics.com/en/news/lithium-ion-fire-causes-emergency-power-shutdown-at-digital-realty-data-center-in-singapore/>
- <https://www.fireengineering.com/fire-safety/diesel-to-lithium-ion-batteries-the-fire-services-challenge-to-keep-up/>
- <https://www.dhs.gov/science-and-technology/news/2024/12/13/fighting-fire-knowledge-lithium-ion-battery-hazards>

6. **Overall Fire Risk:** The combination of high electrical loads, fuel storage, and battery systems significantly increases the risk of fire. This is particularly concerning given the proximity to homes, schools, and parks. While facilities such as this typically have complicated fire suppression systems there are fires at these types of facilities every year. These more modern facilities with higher power densities have higher risk as they are more unproved over time.
- https://response.epa.gov/site/site_profile.aspx?site_id=15259

The combination of large quantities of electricity, large amounts of lithium batteries, and large amounts of diesel fuel present a very unique risk that is not compatible close to residences. We believe that the overall fire risk is great enough for this proposal to be denied.

7. **Negative Impact on Property Values:** The presence of an industrial facility such as a data center in close proximity to residential homes will reduce property values. This undermines the investments made by families who chose Fairmeadow for its peaceful and safe environment. Our impact is far less than the families of Naper Commons, when the Naperville Zoning Board and City Council approved the zoning and allowed the construction of residential housing abutting the ORI district it has a responsibility to not allow a positionally dangerous industrial facility to be placed directly next to residential homes.

In light of these concerns, we respectfully urge the Planning and Zoning Board to reject the proposed data center development. We believe that alternative locations, better suited for industrial infrastructure, should be considered—ones that do not compromise the safety and integrity of established residential neighborhoods.

We appreciate your attention to this matter and your commitment to responsible urban planning. Please feel free to contact me directly should you wish to discuss our concerns further.

Sincerely,
Kendrick Sands
President, Fairmeadow Neighborhood Association

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████████████████████

Kopinski, Sara

From: Egner, Therese
Sent: Thursday, August 28, 2025 3:20 PM
To: Kopinski, Sara
Subject: FW: Data center

Hi, Sara! Please see this public comment for DEV-0057-2025.

Therese Egner
Assistant Planner | Planning & Development - TED Business Group City of Naperville | 400 S. Eagle St. Naperville, IL 60540
(630) 420-4179 | egnert@naperville.il.us

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-----Original Message-----

From: Pam Ebert <[REDACTED]>
Sent: Thursday, August 28, 2025 2:58 PM
To: Planning <Planning@naperville.il.us>
Subject: Data center

[You don't often get email from [REDACTED]. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

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As a resident of Naperville for 30 years we are opposed to the data center. Electricity and water issues and research shows many are so loud they can create health issues for nearby residents. Please reject this proposal.

Fred and Pam Ebert
[REDACTED]
Naperville.
Sent from my iPhone

Kopinski, Sara

From: Egner, Therese
Sent: Thursday, August 28, 2025 3:56 PM
To: Kopinski, Sara
Subject: FW: Submission of written comments for 9/3 hearing regarding proposed Karis data center

FYI- public comment for DEV-0057-2025

Therese Egner

Assistant Planner | Planning & Development - TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 420-4179 | egnert@naperville.il.us

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From: Kitt Wolfenden <[REDACTED]>
Sent: Thursday, August 28, 2025 3:30 PM
To: Planning <Planning@naperville.il.us>
Subject: Submission of written comments for 9/3 hearing regarding proposed Karis data center

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Dear Naperville Planning and Zoning Commission,

I am writing to express my strongest concern about the proposed Karis data center, which would be of little if any economic benefit and incredibly significant environmental harm. PLEASE SAY NO to this horrible proposal.

Specific critical facts for you to consider:

- **Data centers do not deliver on their job creation claims** - per the Wall Street Journal, "The AI Data-Center Boom is a Job-Creation Bust: Data centers have rightly earned a dismal reputation of creating the lowest number of jobs per square foot in their facilities"
- **Data centers can consume MILLIONS of gallons of water each day for their cooling systems**; NE IL has been a mild drought for nearly a decade, and once this data center would drain the local aquifer dry, **it would literally start sucking Lake Michigan dry**, which would be unimaginably horrible
- **Data centers require absolutely massive amounts of electricity, the cost of which is very unfairly passed onto the community** instead of borne solely by the data center owners
- **Data centers' generators are a huge source of greenhouse gas emissions and noise pollution**
- **Data centers create significant electronic waste** by needing constant upgrade and replacement of IT equipment, which is often not disposed of properly because the fines for improper disposal are less than the cost of proper disposal - improper disposal leads to heavy metals leaching into the ground
- **Data center construction significantly increases impervious surfaces which negatively impacts local ecosystems and stormwater runoff**
- **Data centers keep their buildings fully lit which creates light pollution** that harms the natural ecosystems around them

PLEASE say no to this horrible project! The community does not want this, as is evidenced by the thousands of signatures on this petition here: change.org/p/deny-the-proposed-data-centers?recruiter=1168014641

Thank you,
Katherine Wolfenden
Resident of DuPage County, [REDACTED]

--

Kitt Wolfenden
[REDACTED]

Kopinski, Sara

From: Iwicki, Brad
Sent: Monday, September 1, 2025 4:30 PM
To: Kopinski, Sara
Subject: FW: The planning and zoning meeting , Sept. 3rd: data centers

Data Center - POD

Brad Iwicki

Assistant Planner | Planning & Development – TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 305-7021 | iwickib@naperville.il.us

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From: Veta Bonnewell [REDACTED]
Sent: Saturday, August 30, 2025 12:21 PM
To: Planning <Planning@naperville.il.us>
Subject: The planning and zoning meeting , Sept. 3rd: data centers

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I have 2 major concerns:

- 1) I understand that data centers require a large amount of water. I would like to know where proposed data centers in Naperville plan to get their water? What effect will this have on Naperville's water supply and also the impact on the water availability and quality of the surrounding region.
- 2) The vast amount of electricity needed by the data center and its availability, impact on availability and cost to residents of the region.

I believe that the approval of the zoning variances proposed by this request should be tabled, pending review of water requirements impact, and strain on the electrical grid.

Veta Bonnewell

Kopinski, Sara

From: Egner, Therese
Sent: Tuesday, September 2, 2025 8:24 AM
To: Kopinski, Sara
Subject: FW: Data Center in Naperville

FYI- A public comment for DEV-0057-2025 that came in yesterday!

Therese Egner

Assistant Planner | Planning & Development - TED Business Group
City of Naperville | 400 S. Eagle St. Naperville, IL 60540
(630) 420-4179 | egnert@naperville.il.us

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From: Brian McGreevy <[REDACTED]>
Sent: Monday, September 1, 2025 8:12 PM
To: Planning <Planning@naperville.il.us>
Subject: Data Center in Naperville

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Hello, I'm writing you with strong opposition to the approval of a data center in Naperville. A data center would drastically increase the electricity demand from our city, and that's not something we need. Yes, we all use more than we used to 20 years ago. With more electrified devices, cars, networks, it's a reality. Sites like these provide no value to the residents of Naperville. The jobs are very few, the energy consumption is stratospherically high, and guarantees higher risk of power disruptions. At present, such a center would drastically raise the needed output from non-renewable energy sources. I also question how this fits within Naperville's values and strongly oppose the approval.

Thank you,
Brian McGreevy

Kopinski, Sara

From: Egner, Therese
Sent: Tuesday, September 2, 2025 8:25 AM
To: Kopinski, Sara
Subject: FW: Comment on DEV-0057-2025

FYI- A public comment for DEV-0057-2025 that came in this morning!

Therese Egner

Assistant Planner | Planning & Development - TED Business Group
City of Naperville | 400 S. Eagle St. Naperville, IL 60540
(630) 420-4179 | egnert@naperville.il.us

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From: Albert Brown [REDACTED]
Sent: Tuesday, September 2, 2025 7:52 AM
To: Planning <Planning@naperville.il.us>
Subject: Comment on DEV-0057-2025

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re: Comment on DEV-0057-2025

Dear Planning Commission,

I'd like to provide a comment for the proposed development of a Datacenter in North Naperville after reviewing the case file available online.

In my opinion, what is proposed is **not a good use of the land in that part of our city**, especially because of the new townhome community that has been built out over the last few years.

A better use of that land, if not dedicated to more housing under \$700K, would be to have community amenities like a library annex/extension (a smaller footprint) with a park/playground and shopping like groceries, cafes, etc. to benefit the nearby residents.

I would also like to call attention to a statement in the case file regarding backup generators. On Page 7 of the petition, they stated: "Notably, generators are used solely in the event of a power outage or for periodic testing to ensure their operation."

This statement is not accurate. There are other circumstances that necessitate a datacenter to use their onsite diesel generators including when there is a strain on the regional power grid and a "load shed" or emergency generation request sent from the grid operators (e.g. PJM or MISO) as we saw happen during this past summer's heat wave(s) across the Midwest and East Coast. ([Source](#), [Reuters](#), [Image](#) of diesel generator smoke in Northern Virginia).

Considering all the environmental factors and impact to the nearby residents, another type of development would be more beneficial.

Thank you,
Best,

Albert Brown
Naperville Resident

Kopinski, Sara

From: Iwicki, Brad
Sent: Monday, September 1, 2025 4:29 PM
To: Kopinski, Sara
Subject: FW: Petition Opposing Proposed Data Center Development – 1,747 Signatures
Attachments: Petition to Zoning 08292025.pdf

Data Center - POD

Brad Iwicki

Assistant Planner | Planning & Development – TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 305-7021 | iwickib@naperville.il.us

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From: Clara Lambert [REDACTED]
Sent: Friday, August 29, 2025 6:51 PM
To: Planning <Planning@naperville.il.us>
Subject: Petition Opposing Proposed Data Center Development – 1,747 Signatures

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Dear Members of the Planning Commission,

On behalf of the residents of Danada Woods, FairMeadow, Naperville Commons, and the surrounding neighborhoods, I am submitting a petition regarding the proposed data center development near our community.

As of today, **1,747 community members and supporters have signed this petition** expressing their opposition to the project due to its incompatibility with the City of Naperville's master plan, concerns over land use, environmental and health risks, and impacts on nearby residential areas.

Please accept this petition, along with the attached comments and signatures, for inclusion in the official record. We respectfully request that the Commission carefully consider the voices of those directly affected by this proposal when making its decision.

We greatly appreciate your time and service to our community. Should you require additional information, please do not hesitate to contact me at [REDACTED]

Sincerely,
Clara Lambert

[REDACTED] Naperville, IL 60563

On behalf of concerned residents and petition signers

Kopinski, Sara

From: Iwicki, Brad
Sent: Monday, September 1, 2025 4:28 PM
To: Kopinski, Sara
Subject: FW: Please include with case: DEV-0057-2025

Data Center - POD

Brad Iwicki

Assistant Planner | Planning & Development – TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

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From: Clara Lambert <[REDACTED]>
Sent: Friday, August 29, 2025 6:54 PM
To: Planning <Planning@naperville.il.us>
Subject: Please include with case: DEV-0057-2025

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<https://www.naperville.il.us/contentassets/7fed1bf2ba19496fa9a037f019616748/2022-03-11-final-naperville-land-use-master-plan.pdf>

I will be speaking and referring to this document. Please include for the members of the zoning and planning board.

Thank you,
Clara Lambert

The Issue

Why the Proposed Data Centers Should Be Denied

Prepared by the Neighborhoods of Danada Woods, FairMeadow, and Naperville Commons

Case #: DEV-0057-2025 – Public Notice of Application

Applicant: Karis Critical, LLC

Location: Nokia property, identified by the parcel numbers listed in the public notice.

Hearing: Public Hearing before the Naperville Planning and Zoning Commission on Wednesday, September 3, 2025, at 7:00 p.m. in the Council Chambers at the Naperville Municipal Center, 400 S. Eagle Street, Naperville, Illinois.

The applicant is seeking approval for:

- Conditional Use – To allow the operation of a data center campus.
- Variance from Section 6-9-3 – Reduction of the required parking.
- Variance from Section 6-2-12.3 – Increase in height of the proposed equipment yard screen wall.
- Variance from Section 6-2-12.4 – Increase in height of the security fence to a maximum of 8 feet.

The proposal calls for the construction of two 211,000 square foot data centers on the Nokia property in Naperville. While presented as economic development, this project poses serious, permanent risks to our community, environment, and quality of life. These impacts cannot be fully mitigated and will be irreversible once built.

Critical Missing or Incomplete Information

- Power Source & Demand – No disclosure of primary or backup power sources, total energy draw, or grid impact. Power study not shared with the public.
- Cooling & Water Usage – Not enough information about stated cooling method, water source, or estimated consumption, or potential changes in the future.
- Stormwater & Environmental Management – No stormwater management plan or environmental impact statement.
- Wildlife & Greenspace Impact – No assessment of habitat loss or effects on the neighboring forest preserves.
- Economic Benefit Data – No projections for permanent jobs or tax revenue.

Without these details, the public and the city cannot fully assess the risks or benefits of this proposal.

Key Reasons for Denial

- Permanent Environmental Damage – Destruction of greenspace and habitat near forest preserves; heat discharge from servers and cooling systems altering the local

microclimate; and millions of gallons of water used annually for cooling, risking future shortages.

- Health & Safety Risks – Diesel generator emissions (particulate matter, nitrogen oxides, sulfur dioxide) linked to respiratory illness and cancer; noise from cooling systems and generators disrupting sleep and wellbeing; and light pollution altering neighborhood character and night sky visibility.
- Infrastructure Strain – Potential overloading of the local power grid; increased stormwater runoff and flooding risk from massive impermeable surfaces; and significant traffic increases during construction and operation.
- Economic & Community Harm – Decline in nearby property values from industrial-scale development; limited permanent job creation relative to the scale of the project; and loss of land that could be used for community-benefiting projects.
- Lack of Transparency – No disclosure of the ultimate customer(s) or long-term commitments; unclear ownership or lease/purchase agreements; and no guarantee that the site won't be abandoned if the operator leaves.

We strongly believe that no amount of “conditions” can fully mitigate these risks. Once built, the impacts of two 211,000 square foot data centers will be permanent and irreversible. We urge the City of Naperville Planning and Zoning Commission to deny Case DEV-0057-2025 in its entirety to protect the health, safety, and quality of life of its residents.

Comments

	City	State	Postal Code	Country	Commented Date	Comment
Vikash Patel	Plover	WI	54467	United States	2025-08-12	"There are hundreds of families that reside right behind the proposed data center. The effects of these data centers have not been yet realized fully yet but we have kids and playgrounds and a natural forest preserve that borders just development. I don't believe that it is mindful to build the state center next to so many natural resources and homes with families and children when There are concerns over the pollution and potential health side effects that may occur from these data centers."
Marcia Bogle	Naperville	IL	60563	United States	2025-08-12	"Noise, water usage , electric usage, higher costs to tax payers, lower property costs because bad for neighborhoods , families, kids."

<p>A Syed</p>	<p>Charlotte</p>	<p>NC</p>	<p>28026</p>	<p>United States</p>	<p>2025-08-12</p>	<p>"Building a data center near residential houses is generally discouraged for several important reasons. Here are the key concerns: — 1. Noise Pollution • Cooling systems, generators, and other mechanical equipment in data centers generate constant humming or loud noise. • This can disrupt the peace in nearby homes, especially during the night or in quiet neighborhoods. — 2. Air Pollution • Backup generators often run on diesel, emitting pollutants like nitrogen oxides and particulate matter. • In case of frequent testing or power outages, this can degrade air quality near homes. — 3. Increased Heat • Data centers generate substantial heat, often released into the surrounding environment through cooling systems. • This can increase the local temperature, making homes nearby less comfortable. — 4. Electromagnetic Interference (EMI) • The large amount of electrical equipment may cause EMI, which could interfere with household electronics, although this risk is usually minimal if well-managed. — 5. Safety and Security Risks • Data centers are critical infrastructure and may be targeted for cyber or physical attacks. • Their presence could potentially increase local security risks or make an area a target in rare worst-case scenarios. — 6. Visual Impact and Property Value • Data centers are often large, industrial-looking buildings. • They can reduce the aesthetic appeal of a neighborhood and potentially lower nearby property values. — 7. Traffic and</p>
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					<p>Construction Disruption • Construction and maintenance activities can lead to increased traffic, noise, and road wear. • Ongoing deliveries, staff movement, and service visits may disrupt residential traffic flow.</p> <p>—— 8. Water Usage (in some cases) • Some data centers use large amounts of water for cooling. • In water-stressed areas, this could strain local water supplies, affecting residential availability. —— In Summary: While data centers are essential for modern infrastructure, placing them near houses raises valid concerns about health, comfort, and property impact. That's why zoning laws typically keep data centers in industrial or commercial zones, away from residential areas.</p>
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A Hub	Naperville	IL	60540	United States	2025-08-15	<p>"I strongly oppose the construction of a data center near our residential area and urge local authorities to reject this proposal. As a concerned resident, I've outlined 5 compelling reasons below why this development would harm our community, environment, and quality of life. These points highlight the significant risks that outweigh any potential benefits, and I hope they encourage others to join me in signing this petition.</p> <ol style="list-style-type: none">1. Excessive Noise Pollution: Data centers produce a relentless hum from cooling fans and generators, often exceeding 60 decibels. This constant noise disrupts sleep, triggers nightmares in children, and leads to widespread sleep deprivation. In places like Virginia, residents describe it as an "obnoxious whir" that invades their homes 24/7.2. Strained Local Power Grids: These facilities devour up to 50 times more energy than typical office buildings, putting immense pressure on our power infrastructure. This could result in higher utility bills for everyone and increase the risk of blackouts during peak times. In the Southwest, similar data centers have already driven up energy rates by 17% over the past decade, unfairly burdening households.3. High Water Consumption: Cooling systems in data centers guzzle millions of gallons of water daily, competing directly with residential and agricultural needs. In water-stressed areas like Arizona, a single facility could consume enough to supply hundreds of homes, depleting local supplies
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						<p>and exacerbating droughts without any regard for community sustainability. 4. Environmental Degradation: Backup generators emit harmful pollutants such as nitrogen oxide and diesel exhaust, while the noise and operations displace wildlife and degrade ecosystems. This raises serious environmental justice issues, affecting both urban and rural areas by contributing to air pollution and habitat loss that our community cannot afford. 5. Reduced Quality of Life: Living near a data center means constant disturbances, from diesel odors wafting through the air to a severed connection with nature. Many residents in affected areas have been forced to sell their homes, with one noting it's simply "not a good quality of life." Our neighborhood deserves better than to become an industrial zone. In conclusion, building a data center here would prioritize corporate interests over the well-being of families, the environment, and our shared resources. Let's protect our community by halting this project now. Sign the petition and make your voice heard!"</p>
Perigon Service				United States	2025-08-16	"https://www.chicagotribune.com/2025/08/13/data-center-naperville-a-lcatel-lucent/"

<p>Jeff Banowetz</p>	<p>Naperville</p>	<p>IL</p>	<p>60563</p>	<p>United States</p>	<p>2025-08-18</p>	<p>"After having just completed a new residential development here, why are the property owners now pivoting to an industrial facility with serious noise and pollution concerns? There's plenty of open space in Illinois without neighborhoods next door that would be a better fit for data centers. Please read about the terrible noise pollution going on in Aurora right now because of a data center: https://www.chicagotribune.com/2025/08/11/residents-near-cyruson-e-data-center-in-aurora-concerned-about-noise/ Here's what neighbors of that facility are saying: "Laura Evans, a resident of the nearby Palomino Springs neighborhood, said that she and some of her neighbors would describe the noise coming from the data center during the repairs in April as being like a helicopter was landing on her roof. Paul Jaskowiak, who lives in the same neighborhood, said it sounded to him like a diesel truck was idling just outside his house, but it just never went away." It's a terrible idea to put something like this next to a dense Naperville residential neighborhood. The city council rezoned this area for residential development in 2021. Why would they even consider allowing this to be built on next door to the new homes?"</p>
<p>Christopher Baugh</p>	<p>Naperville</p>	<p>IL</p>	<p>60563</p>	<p>United States</p>	<p>2025-08-18</p>	<p>"I've heard the noise and water use is outrageous. We love our quiet neighborhood and will have to move if this is built. Please help to deny this build. I'm sure it's terrible for the environment as well. And this is right on a preserve."</p>

Sylvie Chau	Wheaton	IL	60187	United States	2025-08-19	"Data centers produce a lot of noise and pollution while using up precious natural resources. Let's keep the families living nearby healthy and protect the beautiful forest preserves by denying the proposed data centers."
Jackie Chernesky	glen ellyn	IL	60137	United States	2025-08-19	"This is not good hope the environment and for the Forest preserves nearby. Also the enormous amount of water usage should be a concern."
Matt Niezgoda	Lombard	IL	60148	United States	2025-08-20	"One of the great things about the collar counties in comparison to Cook County is the amount of natural green space. Building a soulless data center with no economic benefit other than to aid in the mining of personal data for the benefit of multiple S&P 500 companies would be a great step forward in making DuPage County that much less special. Stop making every decision with your wallet, leave Danada and Herrick Lake alone."
Amy Kaczmarczyk	Secaucus	NJ	7094	United States	2025-08-20	"We are dealing with enough pollution in our air, water cleanliness issues in the Warrenville area and noise pollution let alone the possible toxic exposure risks. Do not further contaminate our community with these data centers!!! This is a community of young families-put our residents first!"
Katie Phillipson	Glen Ellyn	IL	60137	United States	2025-08-20	"Data centers bring little to no value to the community while increasing pollution, electricity use and water use. Chicagoland residents have already seen home electricity bills spike due to data centers, the last thing our residents need in this economy is higher bills for a product no one

						wants."
Katherine Varga	Elk Grove Village	IL	60007	United States	2025-08-21	"I went to college in Naperville and now help to protect our DuPage forest preserves and natural ecosystems. It distresses me greatly to think about the local residents and wildlife that will be directly impacted and automatically be given a lower quality of life as a result of a data center!! Noise pollution, excessive heat, the water necessary to cool such a center, EMI, and other safety risks...we live here because we LOVE our land, quiet neighborhoods, beautiful preserves, and natural wildlife. We INSIST that you reconsider building a data center where it will impact so much and leave such irreversible damage!"
Hashem Said	Naperville	IL	60563	United States	2025-08-21	"This data potentially infringes on the quality of life of local residents, who are enjoying a peaceful and traffic-free neighborhood. A new data center will mean years of noisy construction, a constant humming from an army of servers, and potentially detrimental impacts on the local fauna and flora. If the city of Naperville cares about the tax-paying residents located in the area, they should give greater stock to their concerns and reevaluate their consideration on building this data center."

Emma Tasch	Chicago	IL	60616	United States	2025-08-21	<p>"I grew up in Naperville and currently live in Wheaton. For nearly my entire 29 years, Herrick Lake and Danada Forest Preserve have held an immense and very special place in my heart. Nothing but absolutely amazing memories stem from those two beautiful parks: biking on the paths with my family; hiking with my beloved Golden Retriever, Casy, whom I still love and miss to this day; taking romantic walks with my amazing husband, Johnny; running on the trails with my high school cross country team; and wandering through the parks to immerse myself in peace and beauty of God's creation as I recovered from a handful of very traumatic experiences. To me, not only will the data centers destroy the beauty and necessary ecosystems of Herrick Lake and Danada, but it quite possibly will destroy the memories that stem from those two parks. I believe my words relate to many longtime residents of Naperville and Wheaton. Please do not destroy two beautiful lands that not only hold environmental value but sentimental value as well."</p>
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Gina Suareo Cardamone	Naperville	IL	60563	United States	2025-08-21	"I reject this proposal. As a concerned resident, I am retiring soon and recently moved to the area for peace and quality of life in my later years . I had hoped this would be my final move. The noise , energy, water consumption and diesel emissions are all concerns for myself and my family. I have a brand new granddaughter and none of this sounds good or healthy. I am urging Naperville to reconsider. I am sure that there has to be locations that are not near residential communities that could be considered for these data centers. Any benefit from this development should not exceed the needs/ health of the residents. Naperville's claim to being a good place to live will be tarnished by this as well. If the counsel approves such a project, my confidence that Naperville would protect its residents will be lost and I will not consider Naperville in the future as a place I want to live."
Mary Jane Rouchka	Bolingbrook	IL	60440	United States	2025-08-21	"As citizens of the area, who use the local forest preserve, we have the right to know who is going to pay for the noise mediation, the required infrastructure improvements, and the impact on the environment. More information about this plan needs to be transparent and made available to the public in all media: news, papers, internet, mailings, website of local municipalities, etc."
Erkin Urmanbetov	Aurora	IL	60506	United States	2025-08-21	"I strongly oppose the construction of a data center. Please STOP!"

<p>Surinder Madhok</p>	<p>Chicago</p>	<p>IL</p>	<p>60619</p>	<p>United States</p>	<p>2025-08-23</p>	<p>"I strongly urge denial of the proposed data center project in Danada Woods. This development is not in the best interest of the surrounding community, environment, or quality of life. 1. Environmental Impact – Danada Woods is a sensitive natural area that provides critical green space, wildlife habitat, and ecological balance. Construction and operation of large data centers would bring deforestation, habitat loss, and disruption to local ecosystems. 2. Excessive Water & Energy Use – Data centers consume enormous amounts of water for cooling and vast amounts of electricity. This would strain local utilities, increase costs for residents, and undermine sustainability goals. 3. Noise & Pollution – The constant hum of generators, cooling systems, and construction activity would create ongoing noise pollution. Backup diesel generators and truck traffic would also increase air pollution. 4. Traffic & Safety Concerns – Large truck deliveries and employee traffic will worsen congestion on already busy roads, creating safety concerns for nearby residents and school zones. 5. Incompatibility with Surroundings – Danada Woods is a residential and recreational area valued for its tranquility and natural beauty. A massive industrial-style data center complex would be completely out of character with the community and would diminish property values. 6. Better Alternatives Exist – Data centers belong in industrially zoned areas where infrastructure is better equipped to</p>
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						handle their demands, not near homes, parks, and natural preserves."
Andrew Brauer	Memphis	TN	38104	United States	2025-08-24	"Please reject this data center development! Keep our forest preserves beautiful and uncontaminated. We don't want this energy suck crushing our grid either."
Haley Gottardo	Warrenville	IL	60555	United States	2025-08-24	"If you care about birds at nature and protecting our forest preserves, don't let them build this by Herrick lake."
Callan MacBeth	Lisle	IL	60532	United States	2025-08-26	"Every area and the surrounding communities that have had a data center built by have been devastated. They have no water. Ecology is destroyed. We're already doing enough damage by destroying native habitats for expensive, poorly built homes. We cannot let this data center move in."
Michael Farmer	Naperville	IL	60540	United States	2025-08-26	"I am running for DuPage County Forest Preserve Commissioner for District 5 which is Naperville and Lisle Townships. I support the efforts to deny the proposed Data Centers and will help in any way that I can."
F D	Wheaton	IL		United States	2025-08-27	"Down with the Clankers, AI data centers can wait until the electric grid capacity expands."

Josefina Giuffre	Naperville	IL	60540	United States	2025-08-27	<p>""That will not happen, mom. This is Naperville." My 13-year-old son reminded me of what that means. It tells you everything about what our town has stood for and should continue to stand for. We are a prosperous community that has never been swayed by an "easy buck" when it threatens the long-term quality of life and the property values we've worked so hard to build. I've lived here for 26 years. Never did I imagine our city would even consider permitting something that pumps diesel particles into our air, disrupts forest preserve life, and disrupts neighbors' lives with constant noise and light. A facility that would strain our electrical grid and water supply, all while lowering property values without offering compensation. That should not happen here. Naperville is year after year ranked among the best towns to live in. Families have moved here and invested here precisely because this community protects what matters most: safety, health, and quality of life. A data center looks like would bring the opposite. "This is Naperville.""</p>
Robin Schmidt	Naperville	IL	6063	United States	2025-08-27	<p>"Please help protect the green space around our neighborhood. This project will add heat, noise, and more congestion to our surroundings. It will further destroy the habitats of small animals and birds that share the space with us as well. You can hopefully read about other concerns voiced by our neighbors in the comments."</p>
Andrew Bshen	Elmhurst	IL	60126	United States	2025-08-27	<p>"Big Tech's Reign of Terror ENDS NOW!"</p>

John Linden	Bellwood	IL	60104	United States	2025-08-29	"As a long time resident of this area, I strongly reject the idea of a data center being implemented in this area. It's well known by now how compromising these data centers are, from the noise to all the water and electricity drain it has on the entire surrounding area. I want this area to remain an eco-friendly environment and not putting all of the homes around it at risk"
Ted Bourlard	Willow Springs	IL	60480	United States	2025-08-29	"Once the data center is built out, the projected electricity consumption would be equivalent to the electricity consumption of all Naperville residents combined!!! 80% of our electricity is powered by coal-fired power plants, which is an environmental disaster. And when our peak demand and our electricity consumption is increased this drastically, it will almost certainly raise electricity prices for Naperville ratepayers - residents, businesses, schools, churches - all of them will see higher prices. Lastly, it makes no sense to unleash 48 diesel generators in the City of Naperville. Soot pollution affects folks with asthma. At a minimum, replace this with utility grade batteries."

1747 Signatures as of 08/29/2025

Name	City	State	Zip Code	Country	Signed On
Naperville Against Data Center				United States	2025-08-10
Priya Vincent	Naperville	IL	60563	United States	2025-08-10
Clara Lambert	Naperville	IL	60564	United States	2025-08-10
Jordan Saladino	Naperville	IL	60563	United States	2025-08-10
Karen Taylor	Naperville	IL	60563	United States	2025-08-10
Ying Kau	Naperville	IL	60563	United States	2025-08-10
Walter Rein	Chicago	IL	60623	United States	2025-08-10
Teresa Belmonte	Chicago	IL	60602	United States	2025-08-11
Divya Nagendran	Aurora	IL	60505	United States	2025-08-11
Susana Muñoz	Madrid		28019	Spain	2025-08-11
Yolanda Schultes	Wittenbach		9300	Sweden	2025-08-11
Anna Dauksa	Naperville	IL	60563	United States	2025-08-11
Rima Petrutis	Naperville	IL	60563	United States	2025-08-11
Lance Armor		HI		United States	2025-08-11
Jennifer Thomas-Kee	Bolingbrook	IL	60440	United States	2025-08-11
Pypy Pypy	Georgetown			Malaysia	2025-08-12
Lori Melhart	Naperville	IL	60563	United States	2025-08-12
Samir Khan	Chicago	IL	60631	United States	2025-08-12
Jon Paul Jurasas	Naperville	IL	60564	United States	2025-08-12

ayesha khan	Naperville	IL	60564	United States	2025-08-12
Aali Khan	Naperville	IL	60563	United States	2025-08-12
Ansar Mohammed	Naperville	IL	60563	United States	2025-08-12
Jon Inwood	Brooklyn	NY	11226	United States	2025-08-12
Angelica Conwell	Chicago	IL	60616	United States	2025-08-12
Jeanne Seyller	Downers Grove	IL	60516	United States	2025-08-12
Robnie Cho	Houston	TX	77009	United States	2025-08-12
Arlene Greenberg	West Chicago	IL	60185	United States	2025-08-12
Agim Jusufi	Naperville	IL	60563	United States	2025-08-12
Almothana Alhamoud	Naperville	IL	60563	United States	2025-08-12
Ghadeer Thalji	Naperville	IL	60564	United States	2025-08-12
Shahab Khan	Naperville	IL	60563	United States	2025-08-12
Carol Piraino	Bolingbrook	IL	60440	United States	2025-08-12
armer teufel reger	Nurnberg		90443	Germany	2025-08-12
Charyn Desmond	Chicago	IL	60602	United States	2025-08-12
Amanda Laughlin	Naperville	IL	60564	United States	2025-08-12
Mary Beth King	Naperville	IL	60563	United States	2025-08-12
Robert King	Aurora	IL	60572	United States	2025-08-12
Sri K	Naperville	IL	60564	United States	2025-08-12
Daniel Nguyen	Naperville	IL	60563	United States	2025-08-12

Bankim Desai	Naperville	IL	60563	United States	2025-08-12
Mary Ann Muhammad	Naperville	IL	60563	United States	2025-08-12
Steve Jarvis	Naperville	IL	60564	United States	2025-08-12
Colin Laughlin	Naperville	IL	60564	United States	2025-08-12
Hailiang Wang	Naperville	IL	60563	United States	2025-08-12
Davis Hung	Chicago	IL	60602	United States	2025-08-12
Animesh Tohan	Naperville	IL	60563	United States	2025-08-12
Sabanam Lakhey	Naperville	IL	60564	United States	2025-08-12
Jordon Koshgarian	Naperville	IL	60563	United States	2025-08-12
Jamie Windt	Naperville	IL	60564	United States	2025-08-12
Osama Elkhatib	Naperville	IL	60563	United States	2025-08-12
Maureen Dawson-Hurst	Wheaton	IL	60187	United States	2025-08-12
Farah Babar	Naperville	IL	60564	United States	2025-08-12
Hiba Suleman	Naperville	IL	60563	United States	2025-08-12
Vikash Patel	Chicago	IL	60623	United States	2025-08-12
Noshin Khan	Naperville	IL	60563	United States	2025-08-12
Amina Wahba	Naperville	IL	60564	United States	2025-08-12
Dana Darwish	Naperville	IL	60563	United States	2025-08-12
AH Hassaballah	Chicago	IL	60639	United States	2025-08-12
Uzma Kothawala	Naperville	IL	60564	United States	2025-08-12

Jeffrey Seredynski	Naperville	IL	60563	United States	2025-08-12
Emily Henning	St. Charles	IL	60174	United States	2025-08-12
Umera Awan	Hinsdale	IL	60521	United States	2025-08-12
Tara Jarvis	Naperville	IL	60563	United States	2025-08-12
Karina Carbajal	Glendale Heights	IL	60139	United States	2025-08-12
Jacob Hildenbrand	Barrington	IL	60010	United States	2025-08-12
Seher Gill	Chicago	IL	60602	United States	2025-08-12
Jacob Venditti	Wheaton	IL	60189	United States	2025-08-12
Mohammed Ahmed	Arlington Heights	IL	60005	United States	2025-08-12
Khadijah Baig	Plano	TX	75093	United States	2025-08-12
Kauser Ahmad	Columbus	OH	43227	United States	2025-08-12
Marcia Bogle	Naperville	IL	60563	United States	2025-08-12
Suse LaGory	Villa Park	IL	60181	United States	2025-08-12
Usman Haseeb	Columbus	OH	43227	United States	2025-08-12
Binish Baig	Chicago	IL	60636	United States	2025-08-12
Rhonda Dobson	Naperville	IL	60564	United States	2025-08-12
Safurah Ashraf	Naperville	IL	60563	United States	2025-08-12
Kaukab Kohlmann	Strongsville	OH	44136	United States	2025-08-12
Samra Haseeb	Glendale Heights	IL	60139	United States	2025-08-12
Ayesha Hussaini	Fullerton	CA	92833	United States	2025-08-12

Asma Nazneen Hussaini	Thousand Oaks	CA	91362	United States	2025-08-12
LINDSEY KOSHGARIAN	Naperville	IL	60564	United States	2025-08-12
Minaal Khan	Naperville	IL	60563	United States	2025-08-12
Omar Syed	Naperville	IL	60563	United States	2025-08-12
Luselena Mercado	Chicago	IL	60631	United States	2025-08-12
Ambrina Butt	Naperville	IL	60564	United States	2025-08-12
Edgar Mercado	Naperville	IL	60564	United States	2025-08-12
Catherine Biagioli	Naperville	IL	60565	United States	2025-08-12
Ruba Naz	Chicago	IL	60623	United States	2025-08-12
Jackie Birkett	Chicago	IL	60602	United States	2025-08-12
Hanna Tang	Naperville	IL	60563	United States	2025-08-12
Michelle Hardcastle	Naperville	IL	60563	United States	2025-08-12
Asra Azizuddin	Glendale Heights	IL	60139	United States	2025-08-12
Adiba Hussain	Naperville	IL	60564	United States	2025-08-12
Dan Leisten	Naperville	IL	60563	United States	2025-08-12
Julie Kulak	Naperville	IL	60540	United States	2025-08-12
Erum Khan	Naperville	IL	60187	United States	2025-08-12
Sabah Memon	Wheaton	IL	60189	United States	2025-08-12
Kaynaat Syed	Naperville	IL	60563	United States	2025-08-12
Candis Bartys	Rolling Meadows	IL	60008	United States	2025-08-12

Cindy Fu	Aurora	IL	60503	United States	2025-08-12
Mary Watson	Lombard	IL	60148	United States	2025-08-12
Alyssa Keene	Lansing	IL	60438	United States	2025-08-12
Becca Bogle	Naperville	IL	60563	United States	2025-08-12
Yusuf Syed	Chicago	IL	60602	United States	2025-08-12
Patrice Basso	Naperville	IL	60540	United States	2025-08-12
Sai Bharath Attaluri	Naperville	IL	60563	United States	2025-08-12
Vineel Bezawada	Chicago	IL	60563	United States	2025-08-12
Laila Alrajabi	Cleveland	OH	44134	United States	2025-08-12
Rukhsana Iqbal	Westmont	IL	60559	United States	2025-08-12
arima sarkar	Naperville	IL	60563	United States	2025-08-12
Jaxson Neukirch	Aurora	IL	60506	United States	2025-08-12
Terence Maynard	Naperville	IL	60563	United States	2025-08-12
zehra hasan	Naperville	IL	60563	United States	2025-08-12
Peter Kim	Naperville	IL	60563	United States	2025-08-12
Lauren Hayes	Chicago	IL	60622	United States	2025-08-12
Pat Maxwell	Woodland Hills	CA	91364	United States	2025-08-12
sara khan	Naperville	IL	60563	United States	2025-08-12
Kushal Basu	Naperville	IL	60564	United States	2025-08-12
Austin Warford	Loves Park	IL	61111	United States	2025-08-12

Sidrah Khan	Elgin	IL	60120	United States	2025-08-12
Jenitha Pilli	Naperville	IL	60563	United States	2025-08-12
R Elms	Chicago	IL	60602	United States	2025-08-12
Kara Kaminski	Naperville	IL	60563	United States	2025-08-12
Afroz Azizuddin	Cleveland	OH	44134	United States	2025-08-12
Linda Nevills	Crete	IL	60417	United States	2025-08-12
Syed Mansoor	Naperville	IL	60563	United States	2025-08-13
Kristen Aloysius	Garden City	NY	11530	United States	2025-08-13
Nathanael Tewodros	Champaign	IL	61821	United States	2025-08-13
Arjuna Vimalarajah	Evanston	IL	60202	United States	2025-08-13
Gunmeet Maini	Naperville	IL	60563	United States	2025-08-13
Linda Dzugan	Naperville	IL	60563	United States	2025-08-13
Salma Shedbalkar	Naperville	IL	60564	United States	2025-08-13
Manya Khan	Naperville	IL	60564	United States	2025-08-13
Rob Sobiack	Naperville	IL	60602	United States	2025-08-13
Ayesha Ashai	Oak Brook	IL	60523	United States	2025-08-13
Yuvkaran Gahley	Chicago	IL	60657	United States	2025-08-13
James Alexander	Naperville	IL	60563	United States	2025-08-13
Matthew Ciserella	Naperville	IL	60564	United States	2025-08-13
Katalin Kónya-Jakus	Szatymaz			Hungary	2025-08-13

Parth Nanavati	Naperville	IL	60563	United States	2025-08-13
Sagar Shah	Naperville	IL	60563	United States	2025-08-13
Brian Harvey	Chicago	IL	60629	United States	2025-08-13
Ambrish Mehta	San Diego	CA	92154	United States	2025-08-13
Lisa Culligan	Chicago	IL	60602	United States	2025-08-13
Aashna Taneja	Aurora	IL	60572	United States	2025-08-13
Lisa Schwarz	Lemont	IL	60439	United States	2025-08-13
Melody Logsdon	Naperville	IL	60563	United States	2025-08-13
Ainhoa Iglesias-Diaz	Naperville	IL	60563	United States	2025-08-13
Debra Bridwell	Naperville	IL	60540	United States	2025-08-13
Sahil Aggarwal	Naperville	IL	60563	United States	2025-08-13
Krina Patel	Naperville	IL	60563	United States	2025-08-13
Christopher Steven	Naperville	IL	60563	United States	2025-08-13
Ashley Seredynski	Naperville	IL	60563	United States	2025-08-13
Keval Shah	Naperville	IL	60563	United States	2025-08-13
Francis S.	Chicago	IL	60608	United States	2025-08-13
Kim Dolores	Naperville	IL	60563	United States	2025-08-13
Jamesson Dolores	Naperville	IL	60563	United States	2025-08-13
Wendy Filip	Lombard	IL	60148	United States	2025-08-13
Asim Babar	Naperville	IL	60563	United States	2025-08-13

Greg King	Naperville	IL	60563	United States	2025-08-13
Donald Ventura	Oakbrook Terrace	IL	60181	United States	2025-08-13
Nicole Kacirek	Naperville	IL	60563	United States	2025-08-13
Mirela Waterloo	Naperville	IL	60564	United States	2025-08-13
Sherin Vincent	Naperville	IL	60563	United States	2025-08-13
Padmaja Deshpande	Naperville	IL	60563	United States	2025-08-14
Moni Sanchez	Joliet	IL	60435	United States	2025-08-14
Gloria Vancleave	Rockford	IL	61101	United States	2025-08-14
Sarah Anderson	Glen Ellyn	IL	60137	United States	2025-08-14
Zamia Torres	St. Charles	IL	60174	United States	2025-08-14
Aleis Bogun	Elgin	IL	60124	United States	2025-08-14
Aron Gerliczki	Naperville	IL	60563	United States	2025-08-14
Bill Scotti	Chicago	IL	60602	United States	2025-08-14
Paulina Cody				Poland	2025-08-14
Sara Gerliczki	Naperville	IL	60563	United States	2025-08-14
Michael Cody				Poland	2025-08-14
Weronika Malek-Lubawski	Naperville	IL	60563	United States	2025-08-14
Jill Stasch	Crown Point	IN	46307	United States	2025-08-14
Joseph Sojka	Des Plaines	IL	60018	United States	2025-08-14
Kamaldeep Mehta	Chicago	IL	60639	United States	2025-08-14
Mandeep Mehta	Naperville	IL	60563	United States	2025-08-14

Kate LaGory	Downers Grove	IL	60516	United States	2025-08-14
Patricia Burke	Cicero	IL	60615	United States	2025-08-14
Linda Scotti	Chicago	IL	60602	United States	2025-08-14
Danielle Scheidt	Wheaton	IL	60189	United States	2025-08-14
Dan Scheidt	Chicago	IL	60602	United States	2025-08-14
Mary Peters	Naperville	IL	60563	United States	2025-08-14
Deanna Nelms	Naperville	IL	60564	United States	2025-08-14
Fred Palma	Glen Ellyn	IL	60137	United States	2025-08-14
Tanuja Makwana	Naperville	IL	60563	United States	2025-08-14
Neha Jain	Naperville	IL	60563	United States	2025-08-14
Jessica Dwoinen	Naperville	IL	60563	United States	2025-08-14
Asil Elkhatib	Naperville	IL	60056	United States	2025-08-14
Joseph Lambert	Chicago	IL	60602	United States	2025-08-14
Swetha N	Chicago	IL	60602	United States	2025-08-15
Irely Roa	Naperville	IL	60563	United States	2025-08-15
Jessica Ciserella	Aurora	IL	60572	United States	2025-08-15
Juan Chapa	Lisle	IL	60532	United States	2025-08-15
Thomas Waters	Indianapolis	IN	46201	United States	2025-08-15
Abby Ziroli	Chicago	IL	60423	United States	2025-08-15
Justin Kuban	Lisle	IL	60532	United States	2025-08-15

Jihane Abdallah	Chicago	IL	60563	United States	2025-08-15
Lisa Cornelius	Oswego	IL	60543	United States	2025-08-15
Patricia Benda	Naperville	IL	60540	United States	2025-08-15
Zahed Haseeb	Wheaton	IL	60189	United States	2025-08-15
Zeeshan Syed	Naperville	IL	60563	United States	2025-08-15
Beth Baker	Naperville	IL	60563	United States	2025-08-15
Krista Nelson	Chicago	IL	60602	United States	2025-08-15
Jen Banowetz	Naperville	IL	60563	United States	2025-08-15
Brenna Cooley	Chicago	IL	60602	United States	2025-08-15
Syed Mohammed Jameel	glen ellyn	IL	60564	United States	2025-08-15
Brett Wolff	Oswego	IL	60543	United States	2025-08-15
Linda Maurer	Sandwich	IL	60548	United States	2025-08-15
Aubrey Sands	Naperville	IL	60564	United States	2025-08-15
Alexander Huba	Naperville	IL	60540	United States	2025-08-15
Tyler Nelson	Naperville	IL	60563	United States	2025-08-15
Tim Feldballe	Chicago	IL	60608	United States	2025-08-15
ray maxwell	Chicago	IL	60602	United States	2025-08-15
Juan Garcia	Bolingbrook	IL	60490	United States	2025-08-15
Nix Johnson	Naperville	IL	60563	United States	2025-08-15
Marybeth Box	Naperville	IL	60540	United States	2025-08-15

Jessica Mroczek	Homewood	IL	60430	United States	2025-08-15
Michele Keith	Carol Stream	IL	60188	United States	2025-08-15
Albert Benda	Naperville	IL	60540	United States	2025-08-15
Janay Leggett	Plainfield	IL	60586	United States	2025-08-15
Robert Guzy	Burbank	IL	60459	United States	2025-08-15
Manisha Makwana	Naperville	IL	60540	United States	2025-08-15
Kristen Skvarenina	Cicero	IL	60804	United States	2025-08-15
Fayette Wernick	Naperville	IL	60563	United States	2025-08-15
Sandy Butt	Naperville	IL	60564	United States	2025-08-15
Daniel Smith	Naperville	IL	60563	United States	2025-08-15
William Nestel	Naperville	IL	60563	United States	2025-08-16
James Ronald	Aurora	IL	60506	United States	2025-08-16
Judy Priar	Yorkville	IL	60560	United States	2025-08-16
Shawn Rivers	Crystal Lake	IL	60014	United States	2025-08-16
Samar Babar	Houston	TX	77027	United States	2025-08-16
Judy Leo	Naperville	IL	60564	United States	2025-08-16
Jamie Hisgen	Plainfield	IL	60586	United States	2025-08-16
Jacky Jimenez	Schaumburg	IL	60193	United States	2025-08-16
Naresh Makwana	Naperville	IL	60564	United States	2025-08-16
Stephanie Lyons-Olsen	Naperville	IL	60564	United States	2025-08-16

Charles Olsen	Naperville	IL	60563	United States	2025-08-16
Nathaniel Smith	Griffith	IN	46319	United States	2025-08-16
Samantha Morman	Chicago	IL	60560	United States	2025-08-16
Chris Hasty	Western Springs	IL	60558	United States	2025-08-16
Kelly Perez	Plano	IL	60545	United States	2025-08-17
Josh Standiford	Lake Zurich	IL	60047	United States	2025-08-17
Bradley McKay	Aurora	IL	60503	United States	2025-08-17
Muneeza Rahman	Naperville	IL	60563	United States	2025-08-17
Harpekhna Kharbanda	Chicago	IL	60623	United States	2025-08-17
Uppili Raman	Naperville	IL	60564	United States	2025-08-17
Laura Brodbeck	Naperville	IL	60564	United States	2025-08-17
Anastazja Lubecki	Naperville	IL	60564	United States	2025-08-17
Sandra Sawyer	Naperville	IL	60563	United States	2025-08-17
Jianqi Xing	Naperville	IL	60563	United States	2025-08-17
Brian Glasby	Naperville	IL	60563	United States	2025-08-17
Colleen Glasby	Chicago	IL	60605	United States	2025-08-17
Suhail Khokhar	Chicago	IL	60602	United States	2025-08-17
Callie Sharp	Naperville	IL	60563	United States	2025-08-17
Saqib Ali	Naperville	IL	60563	United States	2025-08-17
Lynn Cotteleer	Naperville	IL	60564	United States	2025-08-17

Christi Littell	Naperville	IL	60564	United States	2025-08-17
Rick Miller	Naperville	IL	60564	United States	2025-08-17
Michael Caputo	Naperville	IL	60563	United States	2025-08-17
Mary Serrano	Chicago	IL	60638	United States	2025-08-18
Bill Littell	Aurora	IL	60572	United States	2025-08-18
Umair Randhawa	Naperville	IL	60563	United States	2025-08-18
Jun Zhang	Naperville	IL	60563	United States	2025-08-18
Anisa Haxhiaj	Naperville	IL	60563	United States	2025-08-18
Besnik Mehmeti	Naperville	IL	60563	United States	2025-08-18
Ross Harris	Naperville	IL	60563	United States	2025-08-18
Krystal Harris	Naperville	IL	60563	United States	2025-08-18
Cameron Stiehm	Red Lake	MN	56671	United States	2025-08-18
Ravi Mazumdar	Naperville	IL	60540	United States	2025-08-18
Jessica Yates	Sandwich	IL	60548	United States	2025-08-18
Amit Waghray	Cicero	IL	60804	United States	2025-08-18
James Guzdziol	Naperville	IL	60563	United States	2025-08-18
Cassandra Bidus	Naperville	IL	60564	United States	2025-08-18
Vijay Saripella	Glendale Heights	IL	60139	United States	2025-08-18
Afzal Syed	Naperville	IL	60563	United States	2025-08-18
Vivek Khosla	Manassas	VA	20110	United States	2025-08-18

Mohsin Barkat	Naperville	IL	60564	United States	2025-08-18
Doreen Berard	Naperville	IL	60564	United States	2025-08-18
Grace Lubecki	Naperville	IL	60564	United States	2025-08-18
Kanchan V	Naperville	IL	60564	United States	2025-08-18
Nhyeema Chery	Naperville	IL	60564	United States	2025-08-18
Anil Jampana	Naperville	IL	60563	United States	2025-08-18
andy close	Naperville	IL	60540	United States	2025-08-18
Holly Jacobson	Round Lake	IL	60073	United States	2025-08-18
Maureen Slaven	Wheaton	IL	60189	United States	2025-08-18
Renee Benson	Bartlett	IL	60103	United States	2025-08-18
Lisa Camey	Wheaton	IL	60189	United States	2025-08-18
gabrielle reczek	Wheaton	IL	60148	United States	2025-08-18
Louise Kirkman	Wheaton	IL	60189	United States	2025-08-18
Jessica Krajewski	Wheaton	IL	60189	United States	2025-08-18
Annette Kleinprinz	Winfield	IL	60190	United States	2025-08-18
Erin DeNardo	Chicago	IL	60629	United States	2025-08-18
Ryan Boecker	Naperville	IL	60563	United States	2025-08-18
Lisa Larsen	Warrenville	IL	60555	United States	2025-08-18
Jason Barthel	Chicago	IL	60098	United States	2025-08-18
Austin Kirkman	Muncie	IN	47304	United States	2025-08-18

Martha Barmantje	Carol stream	IL	60188	United States	2025-08-18
Jen Pashup	Wheaton	IL	60189	United States	2025-08-18
Hardik Patel	Chicago	IL	60602	United States	2025-08-18
Jeff Banowetz	Naperville	IL	60564	United States	2025-08-18
Erin Pontius	Wheaton	IL	60189	United States	2025-08-18
Jessica Castillo	Wheaton	IL	60189	United States	2025-08-18
Sarah Slaven	Wheaton	IL	60189	United States	2025-08-18
Brad Feitl	Wheaton	IL	60189	United States	2025-08-18
Lauren Kingston	Wheaton	IL	60189	United States	2025-08-18
Liz Cortez	Gurnee	IL	60189	United States	2025-08-18
RACHEL MAGGIO	Wheaton	IL	60187	United States	2025-08-18
Kelly Cortez	Chicago	IL	60602	United States	2025-08-18
JC Cortez	Wheaton	IL	60189	United States	2025-08-18
candi Rubens	Naperville	IL	60564	United States	2025-08-18
Randy Avalos	Menlo Park	CA	94025	United States	2025-08-18
Donna Nelson	Naperville	IL	60563	United States	2025-08-18
Oscar Villa	Bellwood	IL	60104	United States	2025-08-18
Sandy Koropp	Chicago	IL	60602	United States	2025-08-18
Faizan Khan	Naperville	IL	60563	United States	2025-08-18
Kelli Anderson	St. Charles	IL	60174	United States	2025-08-18

Carrie Dorn	Naperville	IL	60563	United States	2025-08-18
Therese Davis	Glen Ellyn	IL	60137	United States	2025-08-18
Tracey Coleman	Valparaiso	IN	46385	United States	2025-08-18
Sarah Baugh	Naperville	IL	60563	United States	2025-08-18
Christopher Baugh	Naperville	IL	60563	United States	2025-08-18
Dean Grant	Naperville	IL	60564	United States	2025-08-18
Jenna Westbrook	Naperville	IL	60564	United States	2025-08-18
Lisa Thomas	Wheaton	IL	60189	United States	2025-08-18
Maggie Romanovich	Glen Ellyn	IL	60137	United States	2025-08-18
Laura Eichhorn	Wheaton	IL	60189	United States	2025-08-18
Roberto Taruc	Warrenville	IL	60555	United States	2025-08-18
Shana Frederick	Wheaton	IL	60189	United States	2025-08-18
Connor Graham	Chicago	IL	60651	United States	2025-08-18
Joseph Dulay	Chicago	IL	60189	United States	2025-08-18
Barbara Peraza	Carol stream	IL	60188	United States	2025-08-18
Susan Dulay	Wheaton	IL	60189	United States	2025-08-19
Rachel Lazar	Winfield	IL	60190	United States	2025-08-19
Em Peraza	Carol Stream	IL	Carol Stream	United States	2025-08-19
Kathy Osgood	Glen Ellyn	IL	60137	United States	2025-08-19
Jordan Frisbie	Glen Ellyn	IL	60137	United States	2025-08-19

Molly Korb	Malden	MA	2148	United States	2025-08-19
Lydia Clevenger	West Chicago	IL	60185	United States	2025-08-19
Melanie Salinas	Wheaton	IL	60189	United States	2025-08-19
Nancy Wendland	Wheaton	IL	60189	United States	2025-08-19
Jackie Knasel	Wheaton	IL	60189	United States	2025-08-19
Bev Vosicky	Wheaton	IL	60187	United States	2025-08-19
Sheena Wolinski	Glen Ellyn	IL	60137	United States	2025-08-19
Vera Gantenberg	Wheaton	IL	60187	United States	2025-08-19
Eva Kalman	Chicago	IL	60639	United States	2025-08-19
Abby Saul	Wheaton	IL	60187	United States	2025-08-19
Erin Kast	Wheaton	IL	60189	United States	2025-08-19
Jenny Stan	Wheaton	IL	60189	United States	2025-08-19
Magdalena Martinelli	Wheaton	IL	60189	United States	2025-08-19
Laurel Salvador	Wheaton	IL	60187	United States	2025-08-19
CJ Moran	Wheaton	IL	60187	United States	2025-08-19
Claudia Kiley	Wheaton	IL	60187	United States	2025-08-19
William Mackey	Wheaton	IL	60189	United States	2025-08-19
Debbie Douglas	Wheaton	IL	60187	United States	2025-08-19
Claire Most	Wheaton	IL	60187	United States	2025-08-19
Mary Blaas	Wheaton	IL	60148	United States	2025-08-19

matt petersen	Glen Ellyn	IL	60137	United States	2025-08-19
Kelly Elliott	Wheaton	IL	60187	United States	2025-08-19
Leslie Herrera	Chicago	IL	60189	United States	2025-08-19
Dan Nunez	Wheaton	IL	60189	United States	2025-08-19
Gillian Cusack	Chicago	IL	60602	United States	2025-08-19
Eric Eric	Glen Ellyn	IL	60137	United States	2025-08-19
Paige Nussbaumer	Glen Ellyn	IL	60137	United States	2025-08-19
Candace King	Glen Ellyn	IL	60137	United States	2025-08-19
Tom Kelly	Wheaton	IL	60189	United States	2025-08-19
Maureen Livingston	Naperville	IL	60540	United States	2025-08-19
Ashley Kennedy	Warrenville	IL	60555	United States	2025-08-19
Jennifer Nielsen	Wheaton	IL	60189	United States	2025-08-19
Maggie McQuaid	Wheaton	IL	60187	United States	2025-08-19
KATHLEEN MCQUAID	Naperville	IL	60565	United States	2025-08-19
Jordan Karim	Warrenville	IL	60555	United States	2025-08-19
Carol Dreiss	Naperville	IL	60565	United States	2025-08-19
Elizabeth Dickson	Wheaton	IL	60187	United States	2025-08-19
Missy Kilmartin	Naperville	IL	60563	United States	2025-08-19
Katherine Wise	Wheaton	IL	60189	United States	2025-08-19
Stacy Jansen	Glen Ellyn	IL	60137	United States	2025-08-19

Kevin Fitzgerald	Glen Ellyn	IL	60137	United States	2025-08-19
Janet Nalley	Wheaton	IL	60189	United States	2025-08-19
Melissa Showalter	Wheaton	IL	60187	United States	2025-08-19
Jennifer Power	Wheaton	IL	60189	United States	2025-08-19
Toni Renken	Lombard	IL	60148	United States	2025-08-19
MaryCate Most	Chicago	IL	60647	United States	2025-08-19
Nick Ciaccio	Chicago	IL	60563	United States	2025-08-19
Mitch Oddo	Chicago	IL	60602	United States	2025-08-19
Lorie Campos	Wheaton	IL	60189	United States	2025-08-19
Jessica Davidson	Naperville	IL	60565	United States	2025-08-19
Brendan McNelis	Chicago	IL	60602	United States	2025-08-19
Sarah Boecker	Naperville	IL	60623	United States	2025-08-19
Alyssa Oddo	Wheaton	IL	60189	United States	2025-08-19
chelsy christoff	Chicago	IL	60602	United States	2025-08-19
Melissa Hogan	Warrenville	IL	60555	United States	2025-08-19
Elena Nichol	Winfield	IL	60190	United States	2025-08-19
Sylvie Chau	Wheaton	IL	60187	United States	2025-08-19
Kimberly Henny	Hoffman Estates	IL	60189	United States	2025-08-19
Elaine Trainor	Wheaton	IL	60189	United States	2025-08-19
Bob Rubens	Naperville	IL	60564	United States	2025-08-19

Julien Buenaventura	Wheaton	IL	60189	United States	2025-08-19
Kiersten Laansma	Wheaton	IL	60187	United States	2025-08-19
Carrie Kelly	Wheaton	IL	60189	United States	2025-08-19
Mikayla Partain	Wheaton	IL	60187	United States	2025-08-19
Vanessa Zavala	Yorkville	IL	60560	United States	2025-08-19
Cecilia Uribe	Carol Stream	IL	60188	United States	2025-08-19
Karie Milewski	Wheaton	IL	60602	United States	2025-08-19
Patricia Urgo	Winfield	IL	60190	United States	2025-08-19
Marge Adair	Naperville	IL	60564	United States	2025-08-19
Rosa Luttenberger	Wheaton	IL	60189	United States	2025-08-19
Sarah Kuhl	Naperville	IL	60563	United States	2025-08-19
DeAnna Sherpan	Wheaton	IL	60187	United States	2025-08-19
reese Boecker	Naperville	IL	60563	United States	2025-08-19
Farhaana Mujid	Lombard	IL	60148	United States	2025-08-19
Amber Hauck	Chicago	IL	60629	United States	2025-08-19
Mary Tworek-Tupper	Naperville	IL	60563	United States	2025-08-19
Rachel Gluskin	Chicago	IL	60630	United States	2025-08-19
Jared Deleon	Naperville	IL	60563	United States	2025-08-19
Taylor Byers	Naperville	IL	60563	United States	2025-08-19
Alicia Weidner	Wheaton	IL	60189	United States	2025-08-19

Lisa Iliff	Naperville	IL	60565	United States	2025-08-19
Kate Cornwell	Glen Ellyn	IL	60137	United States	2025-08-19
Isaias Ponpa	Wheaton	IL	60187	United States	2025-08-19
Janet Ellison	Glen Ellyn	IL	60137	United States	2025-08-19
Julia Jarez	Wheaton	IL	60189	United States	2025-08-19
Laura Flores	Glen Ellyn	IL	60137	United States	2025-08-19
MICHELLE TSALTAS	Wheaton	IL	60189	United States	2025-08-19
Lynn Vance	Chicago	IL	60640	United States	2025-08-19
Erin Delgado	Wheaton	IL	60189	United States	2025-08-19
Luis Abrego	Aurora	IL	60506	United States	2025-08-19
Kwangho Jang	Naperville	IL	60563	United States	2025-08-19
Kristina Goldsmith	Wheaton	IL	60187	United States	2025-08-19
Shannon McLinden	Naperville	IL	60567	United States	2025-08-19
Mary Norris	Wheaton	IL	60189	United States	2025-08-19
Launa Reidenbach	Wheaton	IL	60189	United States	2025-08-19
Carli Rodack	Naperville	IL	60565	United States	2025-08-19
Theresa Ventura	Wheaton	IL	60540	United States	2025-08-19
Trang Green	Glen Ellyn	IL	60137	United States	2025-08-19
Veronica Braley	Wheaton	IL	60187	United States	2025-08-19
Amy Lethert	Wheaton	IL	60189	United States	2025-08-19

KATIE MILLER	Wheaton	IL	60189	United States	2025-08-19
Inessa Uspenskiy	Wheaton	IL	60189	United States	2025-08-19
Shannon Limjuco	Wheaton	IL	60189	United States	2025-08-19
Eric Ortega	Chicago	IL	60647	United States	2025-08-19
James Truesdale	Wheaton	IL	60187	United States	2025-08-19
Dean Ferracane	Naperville	IL	60563	United States	2025-08-19
Jessica Cademartori	Glen Ellyn	IL	60137	United States	2025-08-19
Marina Ghast	Geneva	IL	60134	United States	2025-08-19
Shawna Ransom	Glen Ellyn	IL	60137	United States	2025-08-19
Matt Csakai	Carol Stream	IL	60188	United States	2025-08-19
Deborah Gits-Joseph	Park Ridge	IL	60068	United States	2025-08-19
jennifer Wyrick	Amite	LA	70422	United States	2025-08-19
Barbara Hoyt	Naperville	IL	60563	United States	2025-08-19
Robin Gilbert	Chicago	IL	60607	United States	2025-08-19
Lori Gaspar	Glen Ellyn	IL	60137	United States	2025-08-19
Akash Jain	Naperville	IL	60563	United States	2025-08-19
Linda Christopher	Wheaton	IL	60189	United States	2025-08-19
Julie Peterson	Chicago	IL	60189	United States	2025-08-19
Rebecca Stiles	Naperville	IL	60565	United States	2025-08-19
Kara Hutson	Warrenville	IL	60555	United States	2025-08-19

Kaitlyn Evoy	Lisle	IL	60532	United States	2025-08-19
Lauren Pernel	Chicago	IL	60610	United States	2025-08-19
Lisbeth Webb	St Louis	MO	63124	United States	2025-08-19
Michele Boutin	Villa Park	IL	60181	United States	2025-08-19
Lauren Garvey	Lombard	IL	60148	United States	2025-08-19
Jessica Nowaczyk	Naperville	IL	60540	United States	2025-08-19
Julia England	Wheaton	IL	60187	United States	2025-08-19
Vicki Schmidt	Wheaton	IL	60189	United States	2025-08-19
Kathy Sedivy	Round Lake	IL	60073	United States	2025-08-19
patrick downs	Lombard	IL	60148	United States	2025-08-19
Lacey Schmidt	Wheaton	IL	60189	United States	2025-08-19
Alissa Tulacro	Downers Grove	IL	60516	United States	2025-08-19
Virgil Banowetz	Chicago	IL	60602	United States	2025-08-19
Theresa Nelles	Wheaton	IL	60189	United States	2025-08-19
Ted Lekan	Wheaton	IL	60187	United States	2025-08-19
Joyce Odell	Elmhurst	IL	60126	United States	2025-08-19
Milena Castro	Plainfield	IL	60586	United States	2025-08-19
Ashley Olson	Wheaton	IL	60187	United States	2025-08-19
Brooke Bartels	Wheaton	IL	60189	United States	2025-08-19
Helen Anne Most	Chicago	IL	60657	United States	2025-08-19

Mariana Franco	Chicago	IL	60657	United States	2025-08-19
Jill Green	Wheaton	IL	60187	United States	2025-08-19
Matt Kataura	Glen Ellyn	IL	60137	United States	2025-08-19
Nicole Finchum	Glen ellyn	IL	60137	United States	2025-08-19
rachel Sedivy	Milwaukee	WI	53214	United States	2025-08-19
Rebecca Palmer	Aurora	IL	60505	United States	2025-08-19
Kathy Flanagan	Glen Ellyn	IL	60137	United States	2025-08-19
Lariza Johnson	Wheaton	IL	60189	United States	2025-08-19
Jill Sedivy	Geneva	IL	60134	United States	2025-08-19
Mark Farwell	Wheaton	IL	60189	United States	2025-08-19
Mindy Robinson	Glen Ellyn	IL	60137	United States	2025-08-19
Glenna Eorgoff	Glen Ellyn	IL	60137	United States	2025-08-19
Jackie Intres	Glen Ellyn	IL	60137	United States	2025-08-19
Ruth Fink-Winter	Wheaton	IL	60187	United States	2025-08-19
James Pelletiere	Lisle	IL	60532	United States	2025-08-19
Jenni Tuttle	Chicago	IL	60602	United States	2025-08-19
Kate Swain	Winfield	IL	60190	United States	2025-08-19
Edward Sandrick	Chicago	IL	60644	United States	2025-08-19
Matthew Sumrak	Glen Ellyn	IL	60137	United States	2025-08-19
Girik Ranchhod	Naperville	IL	60563	United States	2025-08-19

Patricia Kuhl	Aurora	IL	60504	United States	2025-08-19
Nicholas Powers	Atlanta	GA	30306	United States	2025-08-19
Seanna Mullen	Streamwood	IL	60107	United States	2025-08-19
Kaitlin Freveletti	Wheaton	IL	60187	United States	2025-08-19
Mohan Makwana	Naperville	IL	60563	United States	2025-08-19
Lucie Kettering	Chicago	IL	60602	United States	2025-08-19
Julie Limp	Wheaton	IL	60189	United States	2025-08-19
Gina Blume	Lisle	IL	60532	United States	2025-08-19
Christine Garchitorea	Naperville	IL	60563	United States	2025-08-19
Neel Deorukhkar	Naperville	IL	60563	United States	2025-08-19
Emirson Sadiku	Chicago	IL	60602	United States	2025-08-19
Anju Chopra	Naperville	IL	60563	United States	2025-08-19
EunYoung Koh	Naperville	IL	60563	United States	2025-08-19
Kathryn Oyler	Glen Ellyn	IL	60137	United States	2025-08-19
Angela Staley	Wheaton	IL	60187	United States	2025-08-19
Joe Lecroy	Lombard	IL	60148	United States	2025-08-19
Ryan Colglazier	Naperville	IL	60563	United States	2025-08-19
Tim King	Naperville	IL	60563	United States	2025-08-19
Jacob Nelms	Naperville	IL	60564	United States	2025-08-19
Sarah Jurczyk	Warrenville	IL	60555	United States	2025-08-19

Wojciech Lubawski	Naperville	IL	60563	United States	2025-08-19
Margaret Villarreal	Warrenville	IL	60644	United States	2025-08-19
Lindsey Villarreal	Warrenville	IL	60555	United States	2025-08-19
Rachel Alexander	Naperville	IL	60564	United States	2025-08-19
Janet Swain	New York	NY	10004	United States	2025-08-19
Kelly Giambri	Glen Ellyn	IL	60137	United States	2025-08-19
Eunice Plaza	Cleveland	OH	44125	United States	2025-08-19
Prutha Desai	Naperville	IL	60563	United States	2025-08-19
Shireen Nanavati	Chicago	IL	60602	United States	2025-08-19
Kristine Graczyk	Glen Ellyn	IL	60137	United States	2025-08-19
Tanya Klasen	Naperville	IL	60565	United States	2025-08-19
Shalin Desai	Naperville	IL	60563	United States	2025-08-19
Marybeth Fitch	Glen Ellyn	IL	60137	United States	2025-08-19
Darshita Patel	Naperville	IL	60563	United States	2025-08-19
AnnaClaire Brodnick	Naperville	IL	60564	United States	2025-08-19
Kelly Duncan	Wheaton	IL	60187	United States	2025-08-19
Ajay KATIYAR	Chicago	IL	60602	United States	2025-08-19
Tracey Navea	Naperville	IL	60563	United States	2025-08-19
Tanvi Bakshi	Naperville	IL	60563	United States	2025-08-19
Lindsay Reinhardt	Chicago	IL	60602	United States	2025-08-19

Inna Olague	Glen Ellyn	IL	60137	United States	2025-08-19
C del Rosario	Oswego		60543	United States	2025-08-19
Nabil Khan	Naperville	IL	60564	United States	2025-08-19
Liz Pham	Naperville	IL	60563	United States	2025-08-19
Diane Banowetz	Napervi	IL	60602	United States	2025-08-19
Shaan Khan	Chicago	IL	60649	United States	2025-08-19
Rebecca Miller	Wheaton	IL	60187	United States	2025-08-19
Katherine Miller	Chicago	IL	60602	United States	2025-08-19
Libi Smith	Batavia	IL	60510	United States	2025-08-19
Jackie Chernesky	glen ellyn	IL	60137	United States	2025-08-19
Julia Selbo	Naperville	IL	60564	United States	2025-08-19
Miranda Johnson	Wheaton	IL	60189	United States	2025-08-19
Holden Andrews	Western Springs	IL	60558	United States	2025-08-19
Khadijah Alam	Lombard	IL	60148	United States	2025-08-19
Ahmed Alam	Lombard	IL	60148	United States	2025-08-19
Megan Gensler	Winfield	IL	60190	United States	2025-08-19
Colleen Murphy	Downers Grove	IL	60515	United States	2025-08-19
Gina C	Naperville	IL	60563	United States	2025-08-19
Matthew Douglas	Saint Charles	IL	60174	United States	2025-08-19
Sarah Pogorzelski	Glen Ellyn	IL	60137	United States	2025-08-19

Sarah H	Naperville	IL	60564	United States	2025-08-19
Donna Christopher	Warrenville	IL	60555	United States	2025-08-19
Carol Asselmeier	Hixton	WI	54635	United States	2025-08-19
Nancy Hull	Minneapolis	MN	55472	United States	2025-08-19
Katie Schaefer	Glen Ellyn	IL	60137	United States	2025-08-19
Krunal Patel	Naperville	IL	60563	United States	2025-08-19
James Pach	Naperville	IL	60563	United States	2025-08-19
Olivia Wallace	Naperville	IL	60563	United States	2025-08-19
Carlos Pliego	Naperville	IL	60563	United States	2025-08-19
Koji Nagai	Chicago	IL	60602	United States	2025-08-19
Joanne Kaplan	Naperville	IL	60540	United States	2025-08-19
Christie Clark	Aurora	IL	60506	United States	2025-08-19
Kendra Laughlin	Chicago	IL	60623	United States	2025-08-19
Gary Peck	Warrenville	IL	60555	United States	2025-08-19
Ben Nau	Glen Ellyn	IL	60137	United States	2025-08-19
Kathy Hernandez	Homer Glen	IL	60491	United States	2025-08-19
Victoria Stidham	Wheaton	IL	60189	United States	2025-08-19
R Stevens	Naperville	IL	60540	United States	2025-08-19
Hanna Guenther	Naperville	IL	60564	United States	2025-08-19
Rohan Patel	Chicago	IL	60602	United States	2025-08-19

molly martin	Naperville	IL	60540	United States	2025-08-19
Jennifer Cobb	Chicago	IL	60634	United States	2025-08-19
Christina Harding	Naperville	IL	60563	United States	2025-08-19
Jenny Miles	Naperville	IL	60563	United States	2025-08-19
Jackson Purfeerst	Naperville	IL	60565	United States	2025-08-19
Sarah Lamparski	New York	NY	10023	United States	2025-08-19
Cheri Lang	Wheaton	IL	60189	United States	2025-08-19
John Lang	Wheaton	IL	60189	United States	2025-08-19
John Regan	Akron	OH	44326	United States	2025-08-19
Marti Sladek	Downers Grove	IL	60515	United States	2025-08-19
Samuel Jevitz	Wheaton	IL	60189	United States	2025-08-19
Kiavash Sayar	Naperville	IL	60563	United States	2025-08-19
Alla Jusufi	Chicago	IL	60638	United States	2025-08-19
Sujay Shah	Naperville	IL	60563	United States	2025-08-19
Jan Dilorenzo	West Chicago	IL	60185	United States	2025-08-19
Mark Jepsen	Wheaton	IL	60189	United States	2025-08-19
holly hootman	Naperville	IL	60563	United States	2025-08-19
Chris Jevitz	Wheaton	IL	60189	United States	2025-08-19
Marilyn Carbone	Chicago	IL	60623	United States	2025-08-19
Julia Davies	St Charles	IL	60174	United States	2025-08-19

Karen Peck	Indianapolis	IN	46222	United States	2025-08-19
Keith Homel	Plainfield	IL	60544	United States	2025-08-19
Oleh Sydor	Wheaton	IL	60189	United States	2025-08-19
Mark Spieglan	Lisle	IL	60532	United States	2025-08-19
Paige Haviland	Naperville	IL	60540	United States	2025-08-19
Catherine Thomas	Downers Grove	IL	60515	United States	2025-08-19
George Blair	Downers Grove	IL	60515	United States	2025-08-19
Sussn Johansen	Glen Ellyn	IL	60137	United States	2025-08-19
Katherine Peck	Warrenville	IL	60555	United States	2025-08-19
Jeesun Lim	Naperville	IL	60563	United States	2025-08-19
Marissa Mahan	Chicago	IL	60187	United States	2025-08-19
Michelle Featherstone	Glen Ellyn	IL	60137	United States	2025-08-20
William Dabovich	Oswego	IL	60543	United States	2025-08-20
Diane Brady	Geneva	IL	60134	United States	2025-08-20
Kimberly Reese	Villa Park	IL	60181	United States	2025-08-20
Laura Haberer	Chicago	IL	60532	United States	2025-08-20
Colleen Henry	Wheaton	IL	60189	United States	2025-08-20
Neil Fitch	Glen Ellyn	IL	60137	United States	2025-08-20
Sara Rodriguez	Lisle	IL	60532	United States	2025-08-20
Laurie Bo	Wheaton	IL	60187	United States	2025-08-20

Elizabeth Volz	Wheaton	IL	60189	United States	2025-08-20
Jordan Frane	Wauconda	IL	60084	United States	2025-08-20
Mary Reid-Vizintos	Naperville	IL	60563	United States	2025-08-20
Dottie Ashley	Chicago	IL	60623	United States	2025-08-20
Kyle Baker	Naperville	IL	60565	United States	2025-08-20
Laura Steele	Glen Ellyn	IL	60137	United States	2025-08-20
Erol Alitovski	Glen Ellyn	IL	60137	United States	2025-08-20
Elizabeth Mirabella	Wheaton	IL	60189	United States	2025-08-20
Stephanie Chaidez	Chicago	IL	60620	United States	2025-08-20
Christopher Fennell	Downers Grove	IL	60515	United States	2025-08-20
Deb Barclay	Winfield	IL	60190	United States	2025-08-20
Sweta Shah	Naperville	IL	60567	United States	2025-08-20
Linda Cise	Downers Grove	IL	60515	United States	2025-08-20
Usha Ayyagari	Naperville	IL	60565	United States	2025-08-20
Lisa Vassar	Naperville	IL	60540	United States	2025-08-20
Anu Hora	Aurora	IL	60505	United States	2025-08-20
Elizabeth Marshall	Naperville	IL	60565	United States	2025-08-20
Ingrid Kash	Bolingbrook	IL	60440	United States	2025-08-20
Amita Shah	Chicago	IL	60602	United States	2025-08-20
Cynthia Bradtke	Naperville	IL	60540	United States	2025-08-20

Bertrand Leclercq	Naperville	IL	60565	United States	2025-08-20
Grace Chen	Naperville	IL	60565	United States	2025-08-20
Elizabeth Zurek	Naperville	IL	60565	United States	2025-08-20
Beth Rutkowski	Wheaton	IL	60189	United States	2025-08-20
Joanne Gennett	Wheaton	IL	60187	United States	2025-08-20
Clementine Calleja	Naperville	IL	60565	United States	2025-08-20
Jessica Ni	Naperville	IL	60565	United States	2025-08-20
Anne Smith	Naperville	IL	60540	United States	2025-08-20
Catherine Philpott	Naperville	IL	60563	United States	2025-08-20
Kathleen Pach	Naperville	IL	60563	United States	2025-08-20
Susan Ekkebus	Naperville	IL	60540	United States	2025-08-20
Tamar Friedman	Chicago	IL	60629	United States	2025-08-20
Christina Sabo	Naperville	IL	60540	United States	2025-08-20
Yogesh Shah	Naperville	IL	60563	United States	2025-08-20
Beth Huss	Naperville	IL	60564	United States	2025-08-20
Megn Gottig	Naperville	IL	60540	United States	2025-08-20
Violet Pamintuan	Franklin park	IL	60707	United States	2025-08-20
Georgeta Galeru	Aurora	IL	60504	United States	2025-08-20
Josie Sims	Chicago	IL	60639	United States	2025-08-20
Allison Wilson	Indiana	PA	15701	United States	2025-08-20

Sabine Müller	Naperville	IL	60540	United States	2025-08-20
Theodore Bihun	Chicago	IL	60656	United States	2025-08-20
Hannah Garcia	Chicago	IL	60563	United States	2025-08-20
Renee Hoebbel	Glen Ellyn	IL	60137	United States	2025-08-20
Deborah Joggerst Brown	Wheaton	IL	60189	United States	2025-08-20
Corinna Weckerle	Glen Ellyn	IL	60137	United States	2025-08-20
Jennifer Woods	Downers Grove	IL	60515	United States	2025-08-20
geethu ks	Aurora	IL	60502	United States	2025-08-20
Jacob Bonner-Baker	Wheaton	IL	60187	United States	2025-08-20
Lindsay Cairns	Lisle	IL	60532	United States	2025-08-20
Jeannie Laughlin	Round Lake	IL	60073	United States	2025-08-20
Kathryn Hough	Naperville	IL	60540	United States	2025-08-20
Brady Boehm	Naperville	IL	60565	United States	2025-08-20
Aileen Eilert	Chicago	IL	60602	United States	2025-08-20
Will Swenson	Chicago	IL	60612	United States	2025-08-20
Shazia Ahmad	Aurora	IL	60572	United States	2025-08-20
V Shah	Chicago	IL	60605	United States	2025-08-20
Kristie Sweeney	Wheaton	IL	60189	United States	2025-08-20
Ann VanSeters	Glen Ellyn	IL	60137	United States	2025-08-20
Michael Hauck	Wheaton	IL	60187	United States	2025-08-20

Ashley Italia	Naperville	IL	60540	United States	2025-08-20
Jason Bakke	Naperville	IL	60564	United States	2025-08-20
Rudy Villarreal	Warrenville	IL	60555	United States	2025-08-20
Indre Petrauskaite	Naperville	IL	60565	United States	2025-08-20
A H	Naperville	IL	60563	United States	2025-08-20
Nadia Lagen	Westmont	IL	60527	United States	2025-08-20
Alexandra Ocegueda	Naperville	IL	60563	United States	2025-08-20
Francesca Jensen	Lombard	IL	60148	United States	2025-08-20
Rebecca Warren	Chicago	IL	60148	United States	2025-08-20
Maria English	Wheaton	IL	60189	United States	2025-08-20
Sarah Sommer	Naperville	IL	60563	United States	2025-08-20
Sarah Ziolkowski	Naperville	IL	60564	United States	2025-08-20
Nancy Ramberg	Naperville	IL	60565	United States	2025-08-20
Kathleen Parsell	Wheaton	IL	60189	United States	2025-08-20
Patti Koltes	Naperville	IL	60565	United States	2025-08-20
Matt Niezgoda	Lombard	IL	60148	United States	2025-08-20
Carrie Campbell	Wheaton	IL	60189	United States	2025-08-20
Meredith Vecelas	Naperville	IL	60565	United States	2025-08-20
Farkhanda Randhawa	Aurora	IL	60572	United States	2025-08-20
Dan Mueller	Wheaton	IL	60189	United States	2025-08-20

Amanda Wrobel	Naperville	IL	60565	United States	2025-08-20
Kathryn C	Naperville	IL	60540	United States	2025-08-20
Alison Rowland	Naperville	IL	60540	United States	2025-08-20
Kathleen Gray	Naperville	IL	60565	United States	2025-08-20
Laura Cuber	Naperville	IL	60563	United States	2025-08-20
Matthew Kaczmarczyk	Warrenville	IL	60555	United States	2025-08-20
Joy Walker	Naperville	IL	60563	United States	2025-08-20
Kevin Mulqueeny	Naperville	IL	60563	United States	2025-08-20
Mei Wong	Naperville	IL	60563	United States	2025-08-20
Jaime Ricklefs	Warrenville	IL	60555	United States	2025-08-20
Kelly Giovannini	Naperville	IL	60540	United States	2025-08-20
Alison Newell	Warrenville	IL	60555	United States	2025-08-20
Alexis Crater	Minooka	IL	60408	United States	2025-08-20
Jennifer Knox	Wheaton	IL	60189	United States	2025-08-20
Samantha Winfield	Wheaton	IL	60189	United States	2025-08-20
Toni Petri	Naperville	IL	60540	United States	2025-08-20
Keaton Grizzell	Aurora	IL	60502	United States	2025-08-20
Sarah Mallas	Naperville	IL	60565	United States	2025-08-20
Amy Holsinger	Glen Ellyn	IL	60137	United States	2025-08-20
Evonne Cruz	Wheaton	IL	60189	United States	2025-08-20

Nicole Liczbinski	Warrenville	IL	60555	United States	2025-08-20
Peregrine Gerard-Little	Wheaton	IL	60187	United States	2025-08-20
John Powers	New Kent	VA	23124	United States	2025-08-20
Claudia Iannelli	Wheaton	IL	60189	United States	2025-08-20
Elizabeth McDermott	Chicago	IL	60647	United States	2025-08-20
Adam Esmail	Naperville	IL	60540	United States	2025-08-20
Nidhi Nagpal	Des Plaines	IL	60016	United States	2025-08-20
Sandy Bell	Naperville	IL	60540	United States	2025-08-20
Jacqueline Sanchez	Naperville	IL	60540	United States	2025-08-20
Rebecca Heidank	Batavia	IL	60510	United States	2025-08-20
Vishwaprabha Shankaran	Naperville	IL	60564	United States	2025-08-20
Cathy Bolger	Wheaton	IL	60189	United States	2025-08-20
Killian Starnes	Chicago	IL	60602	United States	2025-08-20
Mark Paulsen	Villa Park	IL	60181	United States	2025-08-20
Virginia Sax	Naperville, IL	IL	60565	United States	2025-08-20
Joel Church	Vestal	NY	13850	United States	2025-08-20
Marc Walls	Glen Ellyn	IL	60137	United States	2025-08-20
Agnieszka Kaczmarczyk	Warrenville	IL	60555	United States	2025-08-20
Tracy Hurley	Glen Ellyn	IL	60137	United States	2025-08-20
sam Smith	Winfield	IL	60190	United States	2025-08-20

Heather Wenger	Naperville	IL	60540	United States	2025-08-20
Judi Slate	Dekalb	IL	60115	United States	2025-08-20
Buzz Hunter	Forest Park	IL	60130	United States	2025-08-20
Mark Kaczmarczyk	West chicago	IL	60185	United States	2025-08-20
Amy Kaczmarczyk	Warrenville	IL	60555	United States	2025-08-20
Lynda Maki	Bolingbrook	IL	60440	United States	2025-08-20
Patricia Screiber	Naperville	IL	60565	United States	2025-08-20
Amy Tobin	Naperville	IL	60565	United States	2025-08-20
Marina Sagalovich	Naperville	IL	60563	United States	2025-08-20
Elizabeth Smith	North Aurora	IL	60542	United States	2025-08-20
Matthew Mallas	Naperville	IL	60565	United States	2025-08-20
Mia Stein	Glen Ellyn	IL	60137	United States	2025-08-20
Alyssa Fantin	Aurora	IL	60502	United States	2025-08-20
Pamela Rivera	Warrenville	IL	60555	United States	2025-08-20
Neha Lath	Naperville	IL	60563	United States	2025-08-20
Cathy Lavis	Chicago	IL	60651	United States	2025-08-20
Isabela Leisten	Naperville	IL	60563	United States	2025-08-20
Nolan Ellison	Pierceton	IN	46562	United States	2025-08-20
Adam Foret	Glen Ellyn	IL	60137	United States	2025-08-20
Dana Thomson	Chicago	IL	60642	United States	2025-08-20

Alexis Kube	Carol Stream	IL	60188	United States	2025-08-20
Yesica Cabrera	Chicago	IL	60602	United States	2025-08-20
Jamie Racutt	Schaumburg	IL	60193	United States	2025-08-20
Terri Dunmore	Hoffman Estates	IL	60169	United States	2025-08-20
Nick Souksavat	Romeoville	IL	60446	United States	2025-08-20
Dawn Milani	Naperville	IL	60565	United States	2025-08-20
Natalie Richmond	Wheaton	IL	60189	United States	2025-08-20
Karen Grabski	Warrenville	IL	60555	United States	2025-08-20
Dawn Vance	Naperville	IL	60565	United States	2025-08-20
Judith Grey	Glen Ellyn	IL	60137	United States	2025-08-20
Kenneth Kadlec	Dover	DE	19901	United States	2025-08-20
Jean Eakins	Chicago	IL	60602	United States	2025-08-20
Jennifer Kendzior	Naperville	IL	60563	United States	2025-08-20
Diane Rush	Bryce Canyon City	UT	84764	United States	2025-08-20
Mike Marek	Naperville	IL	60563	United States	2025-08-20
Anthony Leclerc	Naperville	IL	60563	United States	2025-08-20
Lorinda Sorensen	Lombard	IL	60148	United States	2025-08-20
Justin Philips	Naperville	IL	60563	United States	2025-08-20
Jennifer Priestley	Warrenville	IL	60555	United States	2025-08-20
Sid Dogra	Aurora	IL	60504	United States	2025-08-20

chris davidson	naperville	IL	60540	United States	2025-08-20
Arun Natarajan	Naperville	IL	60564	United States	2025-08-20
Jeevan Raheja	Warrenville	IL	60555	United States	2025-08-20
Kathleen Mason	Hilliard	OH	43026	United States	2025-08-20
Archana Shukla	Naperville	IL	60563	United States	2025-08-20
Ravi Shukla	Naperville	IL	60563	United States	2025-08-20
Mary Stadler	Chicago	IL	60629	United States	2025-08-20
Greg Pastuch	Henderson	NV	89052	United States	2025-08-20
Sophie Turner	Malibu	CA	90263	United States	2025-08-20
Zara Khan	Naperville	IL	60563	United States	2025-08-20
Renee Riley	HOFFMAN ESTATES	IL	60169-1670	United States	2025-08-20
Maggie Dieter	Winfield	IL	60190	United States	2025-08-20
Pam Dennison	Naperville	IL	60565	United States	2025-08-20
Leslie Bayles	Lisle	IL	60532	United States	2025-08-20
Janet Chang	Glen Ellyn	IL	60137	United States	2025-08-20
Jason Sisley	Glen Ellyn	IL	60137	United States	2025-08-20
Laura Lentino	Westchester	IL	60154	United States	2025-08-20
Matthew Cronin	Wheaton	IL	60189	United States	2025-08-20
Trevor Lipsett	Wheaton	IL	60189	United States	2025-08-20
Laney Cronin	Wheaton	IL	60189	United States	2025-08-20

Samuel Lake	Des Plaines	IL	60016	United States	2025-08-20
Danielle Rios	Downers Grove	IL	60515	United States	2025-08-20
Kelly Lucas	Glen Ellyn	IL	60137	United States	2025-08-20
Karin Vaughn	Naperville	IL	60540	United States	2025-08-20
Andrzej Opiela	Chicago	IL	60613	United States	2025-08-20
Mallory Hashiguchi	Chicago	IL	60644	United States	2025-08-20
Randi Sarun	Wheaton	IL	60189	United States	2025-08-20
Christina Novak	Naperville	IL	60565	United States	2025-08-20
Aija Veach	Naperville	IL	60564	United States	2025-08-20
Irene Podosenov	Naperville	IL	60563	United States	2025-08-20
Pam Baticados	Romeoville	IL	60446	United States	2025-08-20
Gayle Bailey	Naperville	IL	60563	United States	2025-08-20
Nicholas Podosenov	Chicago	IL	60602	United States	2025-08-20
Christopher Litcher	Naperville	IL	60564	United States	2025-08-20
Lori Robinson	Aurora	IL	60504	United States	2025-08-20
Ashley Abraham	Naperville	IL	60563	United States	2025-08-20
Michael Chung	Naperville	IL	60563	United States	2025-08-20
Katie Phillipson	Naperville	IL	60564	United States	2025-08-20
Tina Murphy	Oswego	IL	60543	United States	2025-08-20
Laura Provancal	Chicago	IL	60602	United States	2025-08-20

John Hollfelder	Wheaton	IL	60189	United States	2025-08-20
Naomi Nieves	Montgomery	IL	60560	United States	2025-08-20
Karyn Phillipson	Glen Ellyn	IL	60137	United States	2025-08-20
Keith Lanzara	Aurora	IL	60502	United States	2025-08-20
Julie Fuentes	Chicago	IL	60651	United States	2025-08-20
Francine Burke	Milwaukee	WI	53216	United States	2025-08-20
Georgina Economos	Algonquin	IL	60102	United States	2025-08-20
Erin Zimmer	Naperville	IL	60565	United States	2025-08-20
Vicki Strykowski	plainfield	IL	60544	United States	2025-08-20
Katherine Edmunds	Aurora	IL	60504	United States	2025-08-20
Jennifer Huang	Naperville	IL	60563	United States	2025-08-20
JOSHUA LINDSAY	Naperville	IL	60565	United States	2025-08-20
Vanessa Madrigal	Chicago	IL	60602	United States	2025-08-20
Jessie Labelle	Wheaton	IL	60189	United States	2025-08-20
Karly Quarnstrom	Chicago	IL	60638	United States	2025-08-20
A Henry	Naperville	IL	60563	United States	2025-08-20
Kiersten Fordemwalt	Chicago	IL	60602	United States	2025-08-20
Barbara Parker	Lisle	IL	60532	United States	2025-08-20
Courtney Tedrick	Naperville	IL	60563	United States	2025-08-20
Claire Tate	Lisle	IL	60532	United States	2025-08-20

Beth Connor	Wheaton	IL	60189	United States	2025-08-20
Betsy Nyman	Chicago	IL	60657	United States	2025-08-20
Dipesh Patel	Naperville	IL	60540	United States	2025-08-20
Charlotte Petersen	Wheaton	IL	60189	United States	2025-08-20
Jillmarie Kawaoka	Naperville	IL	60540	United States	2025-08-20
Julie Siegler	Naperville	IL	60563	United States	2025-08-20
Kayla Bivens	Bolingbrook	IL	60440	United States	2025-08-20
Julie Miller	Naperville	IL	60563	United States	2025-08-20
Alana Sagen	Chicago	IL	60602	United States	2025-08-20
P B	Naperville	IL	60563	United States	2025-08-20
Jason Chin	Naperville	IL	60563	United States	2025-08-20
Brian Turner	Naperville	IL	60540	United States	2025-08-20
Elly Lansdon	Wheaton	IL	60189	United States	2025-08-20
Margaret Kapala	Batavia	IL	60510	United States	2025-08-20
Nadia Fasihi	Naperville	IL	60563	United States	2025-08-20
satish guttikonda	Westlake Village	CA	91361	United States	2025-08-20
Victoria Cohen	Wheaton	IL	60189	United States	2025-08-20
Mary Vernon	Wheaton	IL	60187	United States	2025-08-20
Rene Fiore	Wood Dale	IL	60191	United States	2025-08-20
Erica Oswald	WHEATON	IL	60189	United States	2025-08-20

Matt Vernon	Wheaton	IL	60189	United States	2025-08-20
Naveed Bozai	Naperville	IL	60563	United States	2025-08-20
Amelia Polheber	Chicago	IL	60647	United States	2025-08-20
Obaid Baig	Naperville	IL	60563	United States	2025-08-20
Spencer LaBelle	Wheaton	IL	60189	United States	2025-08-20
Jamie Schmidt	Glen Ellyn	IL	60137	United States	2025-08-21
Erica Scott	Naperville	IL	60540	United States	2025-08-21
Austin Scott	Naperville	IL	60565	United States	2025-08-21
Kelvin Price	Warrenville	IL	60555	United States	2025-08-21
CHRISTINA WETZEL	Naperville	IL	60564	United States	2025-08-21
Chandni Wentzel-Patel	Naperville	IL	60563	United States	2025-08-21
Miriam Ferreyra	Wheaton	IL	60189	United States	2025-08-21
Melissa Recka	Bolingbrook	IL	60440	United States	2025-08-21
Jenny Yount	Chicago	IL	60631	United States	2025-08-21
Fred Jasinski	Naperville	IL	60563	United States	2025-08-21
Mary Erlain	Wheaton	IL	60189	United States	2025-08-21
Jenna Winters	Noblesville	IN	46060	United States	2025-08-21
Arlene Greenberg	Wheaton	IL	60187	United States	2025-08-21
Caitlyn Karl	Naperville	IL	6054	United States	2025-08-21
David Dungan	Wheaton	IL	60189	United States	2025-08-21

Katherine Varga	Elk Grove Village	IL	60007	United States	2025-08-21
Rj Carstens	Naperville	IL	60563	United States	2025-08-21
Dana Lundin	Chicago	IL	60480	United States	2025-08-21
Sean Daly	Downers Grove	IL	60515	United States	2025-08-21
Stephen Dee	Wheaton	IL	60189	United States	2025-08-21
Salman Syed	Naperville	IL	60563	United States	2025-08-21
Hashem Said	Naperville	IL	60563	United States	2025-08-21
Trashaun Hill	Carthage	MS	39051	United States	2025-08-21
Amanda Kolody	Wheaton	IL	60189	United States	2025-08-21
Amelia Carnana	Wheaton	IL	60187	United States	2025-08-21
LAUREN VOSS	Lisle	IL	60532	United States	2025-08-21
Becca Yount	Chicago	IL	60642	United States	2025-08-21
Manisha Chakrabarti	Chicago	IL	60605	United States	2025-08-21
Katherine Massie	St. Charles	IL	60174	United States	2025-08-21
Melody Fliss	Chicago	IL	60618	United States	2025-08-21
Kyle Marks	Lemont	IL	60439	United States	2025-08-21
Arav Juneja	Lisle	IL	60532	United States	2025-08-21
Becky Beilfuss	Glen Ellyn	IL	60137	United States	2025-08-21
Marsha Hamilton	Warrenville	IL	60555	United States	2025-08-21
Puja Jadav	Naperville	IL	60563	United States	2025-08-21

Taj Gubatanga	Naperville	IL	60564	United States	2025-08-21
Terry Neigel	Chicago	IL	60632	United States	2025-08-21
Elizabeth Marske	Glen Ellyn	IL	60137	United States	2025-08-21
Jeremy Rotroff	Naperville	IL	60563	United States	2025-08-21
Nagamani Nandamuri	Naperville	IL	60564	United States	2025-08-21
Tori Kinder	Naperville	IL	60565	United States	2025-08-21
Jody Plowman	Chicago	IL	60602	United States	2025-08-21
Maeley Poppe	Montgomery	IL	60538	United States	2025-08-21
Dheanna Fikaris	Wheaton	IL	60189	United States	2025-08-21
Catherine O'Neal	Glen Ellyn	IL	60137	United States	2025-08-21
Kay Akins	Chicago	IL	60632	United States	2025-08-21
Judy Yount	Palatine	IL	60074	United States	2025-08-21
Susan Arra	Wheaton	IL	60189	United States	2025-08-21
Ann Gjeldum Gjeldum	Aurora	IL	60506	United States	2025-08-21
Harshal Patwardhan	Naperville	IL	60540	United States	2025-08-21
Roxann Honn	Chicago	IL	60647	United States	2025-08-21
Sandra Armstrong	Naperville	IL	60563	United States	2025-08-21
Patricia Jobst	Wheaton	IL	60140	United States	2025-08-21
Katie Carlson	Wheaton	IL	60189	United States	2025-08-21
Gina Suareo Cardamone	Naperville	IL	60563	United States	2025-08-21

Linda Wallace	Wheaton	IL	60189	United States	2025-08-21
Niko Garchitorena	Naperville	IL	60563	United States	2025-08-21
Natalia Kapustina	Naperville	IL	60563	United States	2025-08-21
Natasha Juneja	Lisle	IL	60532	United States	2025-08-21
Margaret Georgelos	Naperville	IL	60540	United States	2025-08-21
Patricia Santaromana	Medinah	IL	60157	United States	2025-08-21
Maddie Olivieri	Naperville	IL	60564	United States	2025-08-21
John Byrne	Glen Ellyn	IL	60137	United States	2025-08-21
John Palmisciano	Wheaton	IL	60189	United States	2025-08-21
Lexi Palacios	Elmhurst	IL	60126	United States	2025-08-21
Carol Mages	Westmont	IL	60559	United States	2025-08-21
Janet Zuffa	Wheaton	IL	60187	United States	2025-08-21
Rich Hansen	Naperville	IL	60563	United States	2025-08-21
Linda Gilbert	WEST CHICAGO	IL	60185	United States	2025-08-21
Jeannette Hoogestraat	Glen Ellyn	IL	60137	United States	2025-08-21
Ryan Olsen	Naperville	IL	60563	United States	2025-08-21
Patrick Donnelly	Glendale Heights	IL	60139	United States	2025-08-21
Gautam Grover	Naperville	IL	60540	United States	2025-08-21
Brynne POOLE	Naperville	IL	60563	United States	2025-08-21
Nezzy Gaspar	Naperville	IL	60564	United States	2025-08-21

Mary Lou Nolan	Darien	IL	60561	United States	2025-08-21
Catherine Kolinski	Chicago	IL	60654	United States	2025-08-21
Jon Gaspar	Naperville	IL	60564	United States	2025-08-21
Reynaldo Romero	Oaklawn	IL	60453	United States	2025-08-21
Huda Silat	Naperville	IL	60565	United States	2025-08-21
Amy Layden	Naperville	IL	60564	United States	2025-08-21
Margaret Van Teylingen	Lombard	IL	60148	United States	2025-08-21
Samantha Reising	Schaumburg	IL	60159	United States	2025-08-21
Lauren Bakke	Naperville	IL	60564	United States	2025-08-21
Keely Walker	Chicago	IL	60639	United States	2025-08-21
Randi Ertz	Lisle	IL	60532	United States	2025-08-21
Stephanie Voss	Warrenville	IL	60555	United States	2025-08-21
John Tasch	Wheaton	IL	60187	United States	2025-08-21
James Connor	Naperville	IL	60540	United States	2025-08-21
Timothy Hicks	Naperville	IL	60563	United States	2025-08-21
Tara Frederick	Wheaton	IL	60189	United States	2025-08-21
Katherine Morris	Naperville	IL	60565	United States	2025-08-21
Donna Peterson	Wheaton	IL	60187	United States	2025-08-21
Christine Dovidio	Wheaton	IL	60189	United States	2025-08-21
Mary Jane Rouchka	Bolingbrook	IL	60440	United States	2025-08-21

Tracy Hernandez	Warrenville	IL	60189	United States	2025-08-21
BOB PAVELECK	Downers Grove	IL	60516	United States	2025-08-21
Katy Sakats	Wheaton	IL	60187	United States	2025-08-21
Molly Hicks	Naperville	IL	60563	United States	2025-08-21
Kathleen Connor	Naperville	IL	60540	United States	2025-08-21
carol ali	La Grange	IL	60525	United States	2025-08-21
Sarah Christensen	Naperville	IL	60565	United States	2025-08-21
Abla Alqaissi	Naperville	IL	60565	United States	2025-08-21
Nancy Cain	Chicago	IL	60620	United States	2025-08-21
Therese Schweiner	Warrenville	IL	60555	United States	2025-08-21
Ruth Allison	New York	NY	10118	United States	2025-08-21
Lesa Bradford	Downers Grove	IL	60515	United States	2025-08-21
Nysa Kjit	Aurora	IL	60506	United States	2025-08-21
Julie Manders	Wheaton	IL	60187	United States	2025-08-21
Max Chaudhary	Aurora	IL	60504	United States	2025-08-21
Erkin Urmanbetov	Naperville	IL	60564	United States	2025-08-21
Ainura Abyshova	Naperville	IL	60564	United States	2025-08-21
Hale Dahlstrom	Chicago	IL	60639	United States	2025-08-21
crystal sajdak	Naperville	IL	60564	United States	2025-08-21
Brianna Romeril	Christchurch			New Zealand	2025-08-21

Rabindra Shrestha	Naperville	IL	60564	United States	2025-08-21
Jade Setropawiro	Amsterdam			Netherlands	2025-08-21
Farrah Clark	Plainfield	IL	60544	United States	2025-08-21
Fae Walker	Portland	OR	97266	United States	2025-08-21
Todd Clarke	Wheaton	IL	60189	United States	2025-08-21
Jeanne Iovinelli	Glen Ellyn	IL	60137	United States	2025-08-21
Taylor Oakland	Naperville	IL	60540	United States	2025-08-21
Noor Khan	Chicago	IL	60640	United States	2025-08-21
Lisa Clauson	Naperville	IL	60563	United States	2025-08-21
Naeem Khan	Naperville	IL	60565	United States	2025-08-21
Khem Neupane	Aurora	IL	60506	United States	2025-08-21
Kabindra Shrestha	Naperville	IL	60563	United States	2025-08-21
maysa haj	Hagerstown	MD	21740	United States	2025-08-21
Lauren Prost	Chicago	IL	60647	United States	2025-08-21
Lisa Pocius	Lombard	IL	60148	United States	2025-08-21
Amanda Hajakian	Naperville	IL	60565	United States	2025-08-21
nikki luck	Aurora	IL	60506	United States	2025-08-21
Janis Wittrig	Chicago	IL	60639	United States	2025-08-21
kripesh shrestha	Chicago	IL	60602	United States	2025-08-21
Alexa Haff	Chicago	IL	60602	United States	2025-08-21

Saroj Kandel	Chicago	IL	60610	United States	2025-08-21
Laurie McMahon	Hinsdale	IL	60521	United States	2025-08-21
Simi Mathew	Chicago	IL	60031	United States	2025-08-22
Akhtar Khan	Naperville	IL	60565	United States	2025-08-22
Bill Nolan	Darien	IL	60561	United States	2025-08-22
Michele Handley	Downers Grove	IL	60515	United States	2025-08-22
Jeewan S	Chicago	IL	60645	United States	2025-08-22
Becky Tamayo	Naperville	IL	60563	United States	2025-08-22
Sally Liu	Downers Grove	IL	60515	United States	2025-08-22
Nancy Donath	Naperville	IL	60565	United States	2025-08-22
Mark Mazman	Naperville	IL	60540	United States	2025-08-22
Sally Tran	Lisle	IL	60532	United States	2025-08-22
Michael Frank	Sterling	IL	61081	United States	2025-08-22
Jax Flaminio	Oswego	IL	60543	United States	2025-08-22
Paul Kocan	Naperville	IL	60564	United States	2025-08-22
Diane Lis	Schaumburg	IL	60193	United States	2025-08-22
Barbara McHugh	Mokena	IL	60448	United States	2025-08-22
Kirsten Money	Naperville	IL	60564	United States	2025-08-22
Shannon Morish	Wheaton	IL	60187	United States	2025-08-22
Jacqueline Torres	Wheaton	IL	60189	United States	2025-08-22

Andrea Hamler	Wheaton	IL	60187	United States	2025-08-22
Sierra Morish	Chicago	IL	60187	United States	2025-08-22
Jenna Kronsted	Naperville	IL	60563	United States	2025-08-22
C Koehler	Downers Grove	IL	60515	United States	2025-08-22
Ann Gibbons	Naperville	IL	60532	United States	2025-08-22
Rose GIULIANA	Warrenville	IL	60555	United States	2025-08-22
G G	Chicago	IL	60602	United States	2025-08-22
Mary Collins	Chicago	IL	60602	United States	2025-08-22
Brittany MacRostie	Wheaton	IL	60189	United States	2025-08-22
Margaret Collins	Chicago	IL	60638	United States	2025-08-22
Sylwia Mirek	Naperville	IL	60563	United States	2025-08-22
Sarwar Azizuddin	Naperville	IL	60563	United States	2025-08-22
Diane Nelson	Wheaton	IL	60189	United States	2025-08-22
Samira Rijal	Aurora	IL	60506	United States	2025-08-22
Sue Zhang	Naperville	IL	60540	United States	2025-08-22
Craig Nelson	Wheaton	IL	60189	United States	2025-08-22
Darci Reagan	Wheaton	IL	60187	United States	2025-08-22
Natalia Santis	Glen Ellyn	IL	60137	United States	2025-08-22
Justin O'Brien	Naperville	IL	60540	United States	2025-08-22
Rue I	St Louis	MO	63112	United States	2025-08-22

Lauren Bezdek	Naperville	IL	60563	United States	2025-08-22
Virginia Augustinsky	Wheaton	IL	60189	United States	2025-08-22
Ed Fitch	Glen Ellyn	IL	60137	United States	2025-08-22
Amanda Wittenborn	Naperville	IL	60565	United States	2025-08-22
Carol Bruns	Wheaton	IL	60187	United States	2025-08-22
Julia Bongiorno	Glen Ellyn	IL	60137	United States	2025-08-22
William McMillion	Glen Ellyn	IL	60137	United States	2025-08-22
susan wooden	Warrenville	IL	60555	United States	2025-08-22
Mary Pennington	Winfield	IL	60190	United States	2025-08-22
Hayley Hayes	Geneva	IL	60134	United States	2025-08-22
Bernadette Ishmael	Glen Ellyn	IL	60137	United States	2025-08-22
Daniel Janssen	Lisle	IL	60532	United States	2025-08-22
Robert Henry	Orland Park	IL	60462	United States	2025-08-22
Radha Shrestha	Chicago	IL	60632	United States	2025-08-22
Anna McCulloch	Chicago	IL	60623	United States	2025-08-22
Jamie Mariotti	Naperville	IL	60540	United States	2025-08-22
Chris Rapp	Darien	IL	60561	United States	2025-08-22
Jenna Siciak	Warrenville	IL	60555	United States	2025-08-22
David Fischer	Northbrook	IL	60062	United States	2025-08-22
Kevin Siciak	Warrenville	IL	60555	United States	2025-08-22

Patrick Schultz	Naperville	IL	60540	United States	2025-08-22
Nurbek Sagan	Naperville	IL	60564	United States	2025-08-22
Elissa Hernandez	Chicago	IL	60602	United States	2025-08-22
Ranbir Singh	Indianapolis	IN	46239	United States	2025-08-22
John Cahill	Winfield	IL	60190	United States	2025-08-22
Patricia Dejmek	Woodridge	IL	60517	United States	2025-08-22
Aakash Gohil	Chicago	IL	60563	United States	2025-08-22
Joey Rodriguez	Aurora	IL	60502	United States	2025-08-22
Tommi Thorn	aurora	IL	60502	United States	2025-08-22
Diane Aniolowski	Lombard	IL	60148	United States	2025-08-22
Ana Dirksen	Wheaton	IL	60189	United States	2025-08-22
Jake Houswerth	Chicago	IL	60602	United States	2025-08-22
Kathleen McHendry	Belchertown	MA	1007	United States	2025-08-22
Sarah Alvestad	Lemont	IL	60439	United States	2025-08-22
Marwan omar	Naperville	IL	60564	United States	2025-08-22
Jacob Weisz	Naperville	IL	60540	United States	2025-08-22
Rohan Ahire	Chicago	IL	60623	United States	2025-08-22
Kathy Wessel	Glen Ellyn	IL	60137	United States	2025-08-22
Kathy Gibson	Naperville	IL	60540	United States	2025-08-22
Barry Tusin	Wheaton	IL	60189	United States	2025-08-22

Belinda Baratta	Spring Grove	IL	60081	United States	2025-08-22
Carol Patterson	Naperville	IL	60563	United States	2025-08-22
Larry Randa	Lisle	IL	60532	United States	2025-08-22
Ashly Bella	Lombard	IL	60148	United States	2025-08-22
Katherine Curley	Naperville	IL	60564	United States	2025-08-22
Sneha Shrungarpawar	Naperville	IL	60563	United States	2025-08-22
Ning Yang	Naperville	IL	60563	United States	2025-08-22
Lisa Lucas	Dunlap	IL	61525	United States	2025-08-22
Amy Tran	Naperville	IL	60563	United States	2025-08-22
Lauren Whaley	Wheaton	IL	60189	United States	2025-08-22
Emily Lambert	Naperville	IL	60564	United States	2025-08-22
DJ Singh	Naperville	IL	60563	United States	2025-08-22
Violet Shamo	Lisle	IL	60532	United States	2025-08-22
Christopher Robinson	Traverse City	MI	49686	United States	2025-08-22
Ce Wu	Naperville	IL	60563	United States	2025-08-22
Joshua Hartman	Naperville	IL	60563	United States	2025-08-22
Reisa Oliver	Naperville	IL	60564	United States	2025-08-22
Joseph Ortiz	Chicago	IL	60540	United States	2025-08-22
Vicki Wobrock	Vernon Hills	IL	60061	United States	2025-08-22
Mandeep Singh	Aurora	IL	60504	United States	2025-08-22

Lauren Bernier	Naperville	IL	60540	United States	2025-08-22
Wieslawa Seredynski	Elk Grove Village	IL	60007	United States	2025-08-22
Rajinder Kaur	Clovis	CA	93619	United States	2025-08-22
Linda DeNicolo	Aurora	IL	60502	United States	2025-08-22
Kiran Rani	Salem	VA	24153	United States	2025-08-22
Mikal Mourad	Naperville	IL	60540	United States	2025-08-22
Rupinder Kaur	Aurora	IL	60502	United States	2025-08-22
Debbie Randa	Downers Grove	IL	60515	United States	2025-08-22
Edyta Meents	Lisle	IL	60532	United States	2025-08-23
Steven DuLaney	St charles	IL	60175	United States	2025-08-23
Diosa Snow	Naperville	IL	60540	United States	2025-08-23
Katherine Pitello	Wheaton	IL	60187	United States	2025-08-23
Marti Tiedeman	Chicago	IL	60654	United States	2025-08-23
Rita Bloomquist	Naperville	IL	60563	United States	2025-08-23
Jessica Murray	Naperville	IL	60565	United States	2025-08-23
Michael Ross	Naperville	IL	60564	United States	2025-08-23
Chase Murray	Wheaton	IL	60189	United States	2025-08-23
Brent Biernbaum	Na	IL	60564	United States	2025-08-23
Lijo Thayyil Thomas	Naperville	IL	60563	United States	2025-08-23
Caroline Vaughan	Aurora	IL	60572	United States	2025-08-23

Doug Chuick	Aurora	IL	60504	United States	2025-08-23
Shari Landeweer	Naperville	IL	60540	United States	2025-08-23
Kyle Lundin	Chicago	IL	60622	United States	2025-08-23
Jenny Meeks	Naperville	IL	60564	United States	2025-08-23
Selina Lepsi	Wheaton	IL	60189	United States	2025-08-23
Michael Kantowski	Naperville	IL	60189	United States	2025-08-23
Traci Kantowski	Naperville	IL	60563	United States	2025-08-23
Emily Kenny	Steger	IL	60475	United States	2025-08-23
Thomas Cosmos	Naperville	IL	60564	United States	2025-08-23
Estelle Mruz	Naperville	IL	60565	United States	2025-08-23
Tamar Friedman	naperville	IL	60653	United States	2025-08-23
Mithu Lijo	Naperville	IL	60563	United States	2025-08-23
Amber Lang	Naperville	IL	60565	United States	2025-08-23
Anshul Bakshi	Naperville	IL	60563	United States	2025-08-23
moein mayeh	Naperville	IL	60563	United States	2025-08-23
Wendy Campbell	Lisle	IL	60532	United States	2025-08-23
Vinh Vo	Naperville	IL	60565	United States	2025-08-23
Gail Asselmeier	Glen Ellyn	IL	60137	United States	2025-08-23
Sophia McClelland	Bolingbrook	IL	60440	United States	2025-08-23
Sharon K	Wheaton	IL	60189	United States	2025-08-23

Sarah Bateman	Chicago	IL	60532	United States	2025-08-23
James Bonderson	Chicago	IL	60602	United States	2025-08-23
Jen Featherstone	Wheaton	IL	60189	United States	2025-08-23
Lisa Krone	Wheaton	IL	60189	United States	2025-08-23
Dami Hellriegel	Naperville	IL	60564	United States	2025-08-23
Claire O'Brien	Chicago	IL	60647	United States	2025-08-23
Eileen Scheidt	Glen Ellyn	IL	60137	United States	2025-08-23
Madina Alimirah	Naperville	IL	60563	United States	2025-08-23
Ashley Schlechte	Naperville	IL	60563	United States	2025-08-23
Andrea Torres	Bolingbrook	IL	60440	United States	2025-08-23
Gayle Rueter	Wheaton	IL	60189	United States	2025-08-23
Danielle Mbadu	Chicago	IL	60602	United States	2025-08-23
Valbona Alitovska	Naperville	IL	60564	United States	2025-08-23
Karen Neville	Naperville	IL	60565	United States	2025-08-23
Ki Hong Park	Naperville	IL	60563	United States	2025-08-23
Jessica Perez	Chicago	IL	60622	United States	2025-08-23
Cate Brady	Wheaton	IL	60187	United States	2025-08-23
Sue LeCroy	Lombard	IL	60148	United States	2025-08-23
Braeden Schmidt	Naperville	IL	60565	United States	2025-08-23
Nancy Pollock	Darien	IL	60561	United States	2025-08-23

Terri Hoehne	Batavia	IL	60510	United States	2025-08-23
Rekyah Wren	Naperville	IL	60540	United States	2025-08-23
Patricia Loechl	Wheaton	IL	60187	United States	2025-08-23
Gwen Mallon	Naperville	IL	60565	United States	2025-08-23
M Alimirah	Naperville	IL	60540	United States	2025-08-23
Abdulrahman Alimirah	Naperville	IL	60563	United States	2025-08-23
Heather Gipson	Batavia	IL	60510	United States	2025-08-23
Maggie Caldwell	Chicago	IL	60647	United States	2025-08-23
KP Pina	Chicago	IL	60602	United States	2025-08-23
Jovany Parra	Chicago	IL	60602	United States	2025-08-23
Jacquelyn Casazza	Glen Ellyn	IL	60137	United States	2025-08-23
Cathy Peceny	Cicero	IL	60804	United States	2025-08-23
Megan Zeman	Wheaton	IL	60189605 64	United States	2025-08-23
abby Wolosewicz	Chicago	IL	60602	United States	2025-08-23
Marie Kavadias	Chicago	IL	60602	United States	2025-08-23
Abdul Mohammed	Naperville	IL	60564	United States	2025-08-23
Grayson Breen	Wheaton	IL	60189	United States	2025-08-23
Katie Savage	Wheaton	IL	60189	United States	2025-08-23
Tom Devitt	Wheeling	IL	60090	United States	2025-08-23
Ash Draighean	Aurora	IL	60506	United States	2025-08-23

Audrey Toogood	Chicago	IL	60641	United States	2025-08-23
Christina Tuskey	Chicago	IL	60657	United States	2025-08-23
Melanie Parker	Naperville	IL	60563	United States	2025-08-23
Jennifer L Vivian	Warrenville	IL	60555	United States	2025-08-23
Sophie Scholl	Waukegan	IL	60085	United States	2025-08-23
Jackie Fiday	Lisle	IL	60532	United States	2025-08-23
Feli Rodriguez	Chicago	IL	60622	United States	2025-08-23
Lauren Harper	Naperville	IL	60565	United States	2025-08-23
Jeffrey Jones	Wheaton	IL	60189	United States	2025-08-23
Avery Staker	Des Moines	IA	50312	United States	2025-08-23
Stella Kim	Naperville	IL	60565	United States	2025-08-23
Ahna LASSEGARD	Chicago	IL	60647	United States	2025-08-23
Ashlyn Dunn	Chicago	IL	60614	United States	2025-08-23
Ruth Julian	Wheaton	IL	60187	United States	2025-08-23
Jessica Lamberson	Bolingbrook	IL	60490	United States	2025-08-23
Jonathan Paulus	Wheaton	IL	60187	United States	2025-08-23
Christina Ross	Naperville	IL	60563	United States	2025-08-23
Susan Galbraith	Chicago	IL	60624	United States	2025-08-23
Surinder Madhok	Chicago	IL	60619	United States	2025-08-23
Joseph Salman	Downers Grove	IL	60515	United States	2025-08-23

Fizzah Hasan	Naperville	IL	60563	United States	2025-08-23
Jainish Joshi	Plainfield	IL	60586	United States	2025-08-23
Samia Hasan	Naperville	IL	60563	United States	2025-08-23
Susan Lies	Naperville	IL	60565	United States	2025-08-23
Mandeep Singh	Plainfield	IL	60586	United States	2025-08-23
Donna Bertram	St. Charles	IL	60175	United States	2025-08-24
Karoline Boehm-Goodnick	Lisle	IL	60532	United States	2025-08-24
Joseph Rodey	Wheaton	IL	60187	United States	2025-08-24
Meghan Ansell	Glen Ellyn	IL	60137	United States	2025-08-24
Elizabeth Tanglis	Palatine	IL	60067	United States	2025-08-24
Tess Foral	Aurora	IL	60504	United States	2025-08-24
Andrew Brauer	Wheaton	IL	60189	United States	2025-08-24
Emily Clausen	Lake Geneva	WI	53147	United States	2025-08-24
T Y	Naperville	IL	60564	United States	2025-08-24
Isabel Isais	Chicago	IL	60602	United States	2025-08-24
Abby Hetlage	Chicago	IL	60641	United States	2025-08-24
Grey Knife knife Knife	Chicago	IL	60622	United States	2025-08-24
Emily Franke	Chicago	IL	60647	United States	2025-08-24
Jimmy Jimjim	Naperville	IL	60563	United States	2025-08-24
Namasivayam Karmeham	Naperville	IL	60563	United States	2025-08-24

Anne Sierak	Downers Grove	IL	60516	United States	2025-08-24
Melissa Gordon	Forest Park	IL	60130	United States	2025-08-24
Lorilin Meyer	Niles	IL	60714	United States	2025-08-24
Lawrance Dobson	Berwyn	IL	60402	United States	2025-08-24
Maureen Lutz	Plainfield	IL	60544	United States	2025-08-24
Amelia Galindo	Naperville	IL	60563	United States	2025-08-24
Diane Okon	Elmhurst	IL	60126	United States	2025-08-24
Shari Plueddemann	Mchenry	IL	60050	United States	2025-08-24
Adam Bitner	Downers Grove	IL	60515	United States	2025-08-24
Ann Letzel	Naperville	IL	60540	United States	2025-08-24
Davida Kalina	Naperville	IL	60565	United States	2025-08-24
Diane Stone	Naperville	IL	60565	United States	2025-08-24
MICHAEL KENNEDY	LISLE	IL	60175	United States	2025-08-24
Haley Gottardo	Warrenville	IL	60555	United States	2025-08-24
Stephanie Cullerton	Exeter	NH	3833	United States	2025-08-24
Deborah Venezia	Naperville	IL	60564	United States	2025-08-24
Robert Perez	Chicago	IL	60609	United States	2025-08-24
Mike Wileman	Naperville	IL	60563	United States	2025-08-24
Mary Perez	Freetown	IN	47235	United States	2025-08-24
Sherry Hamlin-Perez	St Louis	MO	63129	United States	2025-08-24

Madeline Herwig	Chicago	IL	60605	United States	2025-08-24
Dale Kalina	Naperville	IL	60565	United States	2025-08-24
Jennifer Jefko	Hinsdale	IL	60521	United States	2025-08-24
Julia Linna	Plaisir		78370	France	2025-08-24
Elaine Bentley	St. Charles	IL	60174	United States	2025-08-24
Jesse Perez	Lombard	IL	60148	United States	2025-08-24
Michelle Julca	Bolingbrook	IL	60490	United States	2025-08-24
Christopher Murphy	Naperville	IL	60563	United States	2025-08-24
Amanda Medendorp	New Lenox	IL	60451	United States	2025-08-24
Anu Tuladhar	Chicago	IL	60614	United States	2025-08-24
Zachary Kurzenberger	Chicago	IL	60647	United States	2025-08-24
Julie Steffens	Lombard	IL	60148	United States	2025-08-24
Lizzy Waz	Downers Grove	IL	60516	United States	2025-08-24
Uriel Ambrosio	Naperville	IL	60563	United States	2025-08-24
Donald Clark	Wheaton	IL	60187	United States	2025-08-24
Marisa Carter	Winfield	IL	60190	United States	2025-08-24
Jecel Parrish	Bilongbrook	IL	60440	United States	2025-08-24
Denise Cottle	Lisle	IL	60532	United States	2025-08-24
Caroline Castro-Arvis	Elmhurst	IL	60126	United States	2025-08-24
Ariel Arvis	Lisle	IL	60532	United States	2025-08-24

Daisy Castro	Chicago	IL	60622	United States	2025-08-24
Justin Boehm	Naperville	IL	60565	United States	2025-08-24
Charles Desjarden	Plainfield	IL	60544	United States	2025-08-24
Pamela Calloway	Aurora	IL	60572	United States	2025-08-24
Tina novak	Queens	NY	11375	United States	2025-08-24
Marsha Hyslop	Houston	TX	77002	United States	2025-08-24
Megan Griffin	Warrenville	IL	60555	United States	2025-08-24
Shane Conners	Chicago	IL	60602	United States	2025-08-24
Antonia Panganiban	Naperville	IL	60563	United States	2025-08-24
Ashley Arvis	Chicago	IL	60609	United States	2025-08-24
Tara Taylor	Orland Park	IL	60467	United States	2025-08-24
Carl Edmondson Sr.	Bolingbrook	IL	60490	United States	2025-08-24
Brittany Servia	Dodge	WI	53916	United States	2025-08-24
Benjamin Cain	Naperville	IL	60564	United States	2025-08-24
Katherine Wolfenden	Downers Grove	IL	60516	United States	2025-08-25
wendy mcaffrey	Wheaton	IL	60189	United States	2025-08-25
Tracy Turina Johnson	Chandler	AZ	85226	United States	2025-08-25
kate pixler	chicago	IL	60657	United States	2025-08-25
Carol Guernsey	Chicago	IL	60656	United States	2025-08-25
Janine Jordan	West Chicago	IL	60185	United States	2025-08-25

Eileen Graves	Naperville	IL	60540	United States	2025-08-25
N Jay	Naperville	IL	60540	United States	2025-08-25
Erin Lynn	Addison	IL	60101	United States	2025-08-25
Josh Trost	Elgin	IL	60124	United States	2025-08-25
Shriya Deshmukh	Lisle	IL	60532	United States	2025-08-25
Deann Cervera	Naperville	IL	60540	United States	2025-08-25
Jacki Stojkovic	Lombard	IL	60148	United States	2025-08-25
Janet Renaud	Glen Ellyn	IL	60137	United States	2025-08-25
Emily Fitzpatrick	Oak Ridge	TN	37830	United States	2025-08-25
Kelly Timko Glassberg	Naperville	IL	60540	United States	2025-08-25
Sheila Henschel	Woodridge	IL	60517	United States	2025-08-25
Joy N	Honolulu	HI	96822	United States	2025-08-25
Becky Panganiban	Hebron	KY	41048	United States	2025-08-25
Ashley Halbrader	Naperville	IL	60563	United States	2025-08-25
T. Fisher	Aurora	IL	60504	United States	2025-08-25
Chuck Jaudes	Naperville	IL	60540	United States	2025-08-25
Alla Jusufi	Naperville	IL	60563	United States	2025-08-25
Ellen Endres	Woodridge	IL	60517	United States	2025-08-25
C Schultz	Cicero	IL	60804	United States	2025-08-25
Heather Verstat	Aurora	IL	60572	United States	2025-08-25

Daniel Verstat	Chicago	IL	60602	United States	2025-08-25
Jaspreet KHARBANDA	Naperville	IL	60563	United States	2025-08-25
Alka Desai	Aurora	IL	60572	United States	2025-08-25
Catherine Gavin	Naperville	IL	60564	United States	2025-08-25
Dayna Bonebrake	Naperville	IL	60563	United States	2025-08-25
Suzana Chacon	Naperville	IL	60564	United States	2025-08-25
Caleb Iler	Warrenville	IL	60555	United States	2025-08-25
Theresa Robles	Chicago	IL	60618	United States	2025-08-25
Dawn Tuskey	Downers Grove	IL	60516	United States	2025-08-25
Kristin Maagaard	Wheaton	IL	60187	United States	2025-08-25
Kim Calderone	Naperville	IL	60565	United States	2025-08-25
Greta Sudantas	Woodridge	IL	60517	United States	2025-08-25
Ally Kopicki	Cicero	IL	60534	United States	2025-08-25
Alisha Sobral	Palatine	IL	60074	United States	2025-08-25
Rebeca Kitchen	Naperville	IL	60565	United States	2025-08-25
Nick Domkowski	Lyons	IL	60534	United States	2025-08-25
Ally Domkowski	Cicero	IL	60425	United States	2025-08-25
Nicole Haasch	Downers Grove	IL	60515	United States	2025-08-25
Destiny Arroyo	Wheaton	IL	60189	United States	2025-08-25
Patrice Batryn	Chicago	IL	60610	United States	2025-08-25

Jacob Temcio	Carol Stream	IL	60188	United States	2025-08-25
Victor Solia	Glen Ellyn	IL	60137	United States	2025-08-25
Rachel Cunningham	Darien	IL	60561	United States	2025-08-25
Daniella Keulemans	Chicago	IL	60440	United States	2025-08-25
Linda Baker	La Harpe	IL	61450	United States	2025-08-25
Giles Bruce	Naperville	IL	60563	United States	2025-08-25
Kim Yench	Chicago	IL	60632	United States	2025-08-25
Kristen Gasser	Aurora	IL	60506	United States	2025-08-25
Sage Bonebrake	Lynchburg	VA	24515	United States	2025-08-25
Carole Koch	Naperville	IL	60565	United States	2025-08-25
Mary Pat O'Connell	Naperville	IL	60563	United States	2025-08-25
Eden Hinger	Richmond	VA	23234	United States	2025-08-25
FEIPING CHEN	Naperville	IL	60564	United States	2025-08-25
Ella Ohlson	Joliet	IL	60435	United States	2025-08-25
Dinesh Goel	Naperville	IL	60563	United States	2025-08-25
Jaee Hong	Naperville	IL	60563	United States	2025-08-25
Cathy Piehl	Naperville	IL	60563	United States	2025-08-25
Eli Hinger	Warrenville	IL	60555	United States	2025-08-25
Sofiya Malovana	Chicago	IL	60656	United States	2025-08-25
Pam Ebert	Naperville	IL	60540	United States	2025-08-25

Marcos R Rodriguez	Westmont	IL	60559	United States	2025-08-25
Erin McKinney	Chicago	IL	60640	United States	2025-08-25
Karen Muller	Lisle	IL	60532	United States	2025-08-25
Camille Steiner	Naperville	IL	60540	United States	2025-08-25
Nadeem Mirza	Naperville	IL	60563	United States	2025-08-25
Shannon McGregor	Lisle	IL	60532	United States	2025-08-25
Adisa Ato	Chicago	IL	60602	United States	2025-08-25
Naomi Salansky	Aurora	IL	60504	United States	2025-08-25
Jennifer Wallace	Naperville	IL	60563	United States	2025-08-25
Dorothy Thompson	Aurora	IL	60572	United States	2025-08-25
Eva Van someren	Glen Ellyn	IL	60137	United States	2025-08-25
Mirielle Hill	Chicago	IL	60602	United States	2025-08-25
Chris T	Naperville	IL	60540	United States	2025-08-25
Hannah Steiner	Lynchburg	VA	24515	United States	2025-08-25
Terence Kennedy	Hanover Park	IL	60133	United States	2025-08-25
Kristen Wunder	Glenview	IL	60025	United States	2025-08-25
Taylor Sudantas	Woodridge	IL	60517	United States	2025-08-25
Kalpana Ganesan	Naperville	IL	60540	United States	2025-08-25
Christian Carlsen	Chicago	IL	60602	United States	2025-08-25
Theresa Scheet	Glen Ellyn	IL	60137	United States	2025-08-25

Sharon Riemer	Bloomingtondale	IL	60108	United States	2025-08-25
Hilary Orler	Westmont	IL	60523	United States	2025-08-25
Christina Cirelli	Warrenville	IL	60555	United States	2025-08-25
Ana Collado	Brooklyn	NY	11221	United States	2025-08-25
Jill Lejsek	Wheaton	IL	60189	United States	2025-08-25
Heather Lehmann	Aurora	IL	60505	United States	2025-08-26
Callan MacBeth	Lisle	IL	60532	United States	2025-08-26
Sara Smith	Winfield	IL	60190	United States	2025-08-26
Solomon Greene	Cleveland	OH	44109	United States	2025-08-26
Marie Masterson	Warrenville	IL	60555	United States	2025-08-26
Aaron Hill	Wheaton	IL	60187	United States	2025-08-26
Sarah Nagel	Wheaton	IL	60189	United States	2025-08-26
Tina O'Connor	Wheaton	IL	60189	United States	2025-08-26
Meagan Hudak	Wheaton	IL	60189	United States	2025-08-26
Sean O'Connor	Glen Ellyn	IL	60137	United States	2025-08-26
Cassandra Mruk	Wheaton	IL	60189	United States	2025-08-26
Carrie Yench	Warrenville	IL	60555	United States	2025-08-26
Marc Perez	Naperville	IL	60563	United States	2025-08-26
veronica Rinke	Downers Grove	IL	60515	United States	2025-08-26
Audriana Violante	Westchester	IL	60154	United States	2025-08-26

Scarlett Perino	Wheaton	IL	60189	United States	2025-08-26
Matt Pedersen	Ansonia	CT	6401	United States	2025-08-26
Jennifer Estrada	Naperville	IL	60563	United States	2025-08-26
Rupa Sanku	Naperville	IL	60565	United States	2025-08-26
Josue Contreras	Hanover Park	IL	60133	United States	2025-08-26
Rachel Johnston	Glen Ellyn	IL	60137	United States	2025-08-26
Maryann Vazquez	Lisle	IL	60532	United States	2025-08-26
Charise McCarthy	Chicago	IL	60640	United States	2025-08-26
MaryPat Moore	Wheaton	IL	60187	United States	2025-08-26
Daniel Zamora	Naperville	IL	60540	United States	2025-08-26
Rommie Marwah	Naperville	IL	60563	United States	2025-08-26
Isola Metz	Wheaton	IL	60189	United States	2025-08-26
Jack Hayes	Lombard	IL	60148	United States	2025-08-26
Jarred Panganiban	Farmington	MI	48335	United States	2025-08-26
Julia Zamora	Naperville	IL	60175	United States	2025-08-26
chelsea glommen	OSWEGO	IL	60543	United States	2025-08-26
Sanjay Shah	Naperville	IL	60563	United States	2025-08-26
Amy Becker Karl	Warrenville	IL	60555	United States	2025-08-26
Doug Elwell	Lombard	IL	60148	United States	2025-08-26
Ted Berger	Naperville	IL	60564	United States	2025-08-26

Alexa Rubio	Oswego	IL	60543	United States	2025-08-26
Emily Graham	Chicago	IL	60623	United States	2025-08-26
Kimberly Koenig	Chicago	IL	60629	United States	2025-08-26
April Hajek	Bolingbrook	IL	60440	United States	2025-08-26
kendrick sands	Chicago	IL	60638	United States	2025-08-26
Arun Varde	Downers Grove	IL	60515	United States	2025-08-26
Colleen kane	Glen Ellyn	IL	60137	United States	2025-08-26
Patricia Gruber	Berwyn	IL	60402	United States	2025-08-26
Jacquelin Essenburg	Geneva	IL	60134	United States	2025-08-26
Diana Lund	Glen Ellyn	IL	60137	United States	2025-08-26
William Hull	Naperville	IL	60540	United States	2025-08-26
Sandra Phelan	Naperville	IL	60540	United States	2025-08-26
Craig Chapman	West Chicago	IL	60185	United States	2025-08-26
W V	Wheaton	IL	60189	United States	2025-08-26
mckenzie dudoit	Wheaton	IL	60187	United States	2025-08-26
Rebecca Hecker	Wheaton	IL	60189	United States	2025-08-26
nancy kershaw	Carol Stream	IL	60188	United States	2025-08-26
GraceAnn Simoni	Naperville	IL	60540	United States	2025-08-26
Alyssa Myers	Canandaigua	NY	14424	United States	2025-08-26
Alison Dulli	Naperville	IL	60540	United States	2025-08-26

Caitlin Nelson	Naperville	IL	60563	United States	2025-08-26
Emily Gorski	Elmhurst	IL	60126	United States	2025-08-26
Monica Quinn	Naperville	IL	60563	United States	2025-08-26
Will Page	Chicago	IL	60651	United States	2025-08-26
Pat Annerino	Warrenville	IL	60555	United States	2025-08-26
Sharon H. Jones	Aurora	IL	60504	United States	2025-08-26
Orquidea Bruce	Naperville	IL	60564	United States	2025-08-26
Tushar Makwana	Naperville	IL	60540	United States	2025-08-26
Merle Peterson	Leesburg	FL	34748	United States	2025-08-26
Cassidy Clark	Westminster	CO	80234	United States	2025-08-26
Michael Reich	Glendale Heights	IL	60139	United States	2025-08-26
Katharine Berger	Naperville	IL	60563	United States	2025-08-26
Alimirah Alimirah	Chicago	IL	60602	United States	2025-08-26
Christian Hauptman	Lombard	IL	60148	United States	2025-08-26
Michelle LaRusso	Elmhurst	IL	60126	United States	2025-08-26
Leslie Hayward	Naperville	IL	60565	United States	2025-08-26
Leah Thompson	Wheaton	IL	60189	United States	2025-08-26
James Kluckhohn	Warrenville	IL	60555	United States	2025-08-26
Danielle DiCianni	Warrenville	IL	60555	United States	2025-08-26
Michael Farmer	Naperville	IL	60540	United States	2025-08-26

marissa stuart	Naperville	IL	60563	United States	2025-08-26
Lucy Kennedy	Downers Grove	IL	60615	United States	2025-08-26
Connie Orbeta	Glen Ellyn	IL	60137	United States	2025-08-26
robin dean	Sterling heights	MI	48066	United States	2025-08-26
Diane Esser	Chicago	IL	60564	United States	2025-08-26
meg thompson	Glen Ellyn	IL	60189	United States	2025-08-26
Mia Antunez	Lemont	IL	60439	United States	2025-08-26
Jennifer Pawlik	Chicago	IL	60639	United States	2025-08-26
Taylor Atwater	Grayslake	IL	60030	United States	2025-08-26
Lori Robertson	Warrenville	IL	60555	United States	2025-08-26
Madeline Sichz	Lombard	IL	60148	United States	2025-08-26
Patrick Ryan	Downers Grove	IL	60515	United States	2025-08-26
Melissa Blaber	Des Plaines	IL	60018	United States	2025-08-26
Kaylin Stepp	Kalamazoo	MI	49001	United States	2025-08-26
Kenneth Berg	Wheaton	IL	60187	United States	2025-08-26
ayethaw ta	Ithaca	NY	14850	United States	2025-08-26
Robert Davis	Chicago	IL	60186	United States	2025-08-26
CARTER CUMBEY	West Lafayette	IN	47906	United States	2025-08-26
Bianca Rinchiuso	Chicago	IL	60137	United States	2025-08-26
Leigha Ryan	Villa Park	IL	60181	United States	2025-08-26

Ava Wagner	Lombard	IL	60148	United States	2025-08-26
Ron Feret	Naperville	IL	60565	United States	2025-08-26
charlotte long	Lombard	IL	60148	United States	2025-08-26
Terri Son	Downers Grove	IL	60515	United States	2025-08-26
Annie Baumann	Orlando	FL	32835	United States	2025-08-26
Olivia Szymanski	Chicago	IL	60629	United States	2025-08-26
Emma Kuhns	Naperville	IL	60540	United States	2025-08-26
LuAnne Patno	Forest Park	IL	60130	United States	2025-08-26
Tommie Sikora	Wheaton	IL	60187	United States	2025-08-26
Kevin Pinkelman	Glen Ellyn	IL	60137	United States	2025-08-26
Kerry Palm	Westchester	IL	60154	United States	2025-08-26
Carol Dugan	Naperville	IL	60540	United States	2025-08-26
Vallesa Rodriguez	Oklahoma City	OK	73108	United States	2025-08-26
Michael Rybinski	Wheaton	IL	60189	United States	2025-08-26
Alex Wang	Naperville	IL	60563	United States	2025-08-26
Carl Pasquarelli	Wheaton	IL	60187	United States	2025-08-26
Lois Boecker	Naperville	IL	60564	United States	2025-08-26
Shannon Smith	Naperville	IL	60563	United States	2025-08-26
Deb Zelman	Naperville	IL	60540	United States	2025-08-26
Breda Doak	Downers Grove	IL	60516	United States	2025-08-26

August Atkinson	New York	NY	10044	United States	2025-08-26
Rosemarie Buchalski	Wheaton	IL	60189	United States	2025-08-26
Sarah Carroll	New York	NY	10025	United States	2025-08-26
Marian Bowers	Carol Stream	IL	60188	United States	2025-08-26
Abdallah Alimirah	Chicago	IL	60612	United States	2025-08-26
Antoinette Nelson	Chicago	IL	60602	United States	2025-08-26
Nichole Randa	Woodridge	IL	60517	United States	2025-08-26
Evie Valenti	Lombard	IL	60148	United States	2025-08-26
Allie Sims	Marion	IA	52302	United States	2025-08-26
Joan Krawitz	Naperville	IL	60540	United States	2025-08-26
Melissa Reed	Chicago	IL	60625	United States	2025-08-26
Alison La Manna	Warrenville	IL	60555	United States	2025-08-26
Michael Rojas	Clarendon Hills	IL	60514	United States	2025-08-26
Alesia Hillyard	Naperville	IL	60565	United States	2025-08-26
William OHalloran	Chicago	IL	60629	United States	2025-08-27
Cara Panganiban	Downers Grove	IL	60515	United States	2025-08-27
Ruth Woods	Lombard	IL	60148	United States	2025-08-27
Aaron Panganiban	Lombard	IL	60148	United States	2025-08-27
Jennifer Brown	Chicago	IL	60622	United States	2025-08-27
Amanda Patano	Lombard	IL	60148	United States	2025-08-27

Nicole Tompkins	Lombard	IL	60148	United States	2025-08-27
Janice Nilsen	Winfield	IL	60190	United States	2025-08-27
Joanne Kaplan	Naperville	IL	60540	United States	2025-08-27
Alex Tsigan	Naperville	IL	60563	United States	2025-08-27
Lesley Kaloustian	Carol Stream	IL	60131	United States	2025-08-27
Nicea Scheeler	Providence	RI	2908	United States	2025-08-27
Vanessa Jez	Orland Park	IL	60462	United States	2025-08-27
Kate Taylor	Warrenville	IL	60555	United States	2025-08-27
Kayleigh Roy	Hoffman Estates	IL	60169	United States	2025-08-27
Piya Salgia	Wheaton	IL	60189	United States	2025-08-27
Jane Stumbris	Wheaton	IL	60189	United States	2025-08-27
Melissa Bertuca	Mesa	AZ	85204	United States	2025-08-27
Angela Kiselyk	Naperville	IL	60563	United States	2025-08-27
karen Saucedo	Bloomington	IL	60108	United States	2025-08-27
Matthew Moore	Wheaton	IL	60189	United States	2025-08-27
Kat Lageyevsky	Elmhurst	IL	60126	United States	2025-08-27
Michael Theeck	Wheaton	IL	60189	United States	2025-08-27
Hailey Theeck	Wheaton	IL	60189	United States	2025-08-27
Crystal Cosgrove	Wheaton	IL	60187	United States	2025-08-27
Ray Woods	Lombard	IL	60126	United States	2025-08-27

Melanie Sipiora	Naperville	IL	60540	United States	2025-08-27
Frank Dicchole	Bolingbrook	IL	60517	United States	2025-08-27
Kathleen Taft	Naperville	IL	60540	United States	2025-08-27
Michelle Wang	Wheaton	IL	60189	United States	2025-08-27
MARY Louise Wakulich	Naperville	IL	60565	United States	2025-08-27
Kristen Santangelo	Wheaton	IL	60187	United States	2025-08-27
Sravya Surapaneni	Champaign	IL	61820	United States	2025-08-27
Jake Burns	Aurora	IL	60504	United States	2025-08-27
joefina giuffre	Naperville	IL	60540	United States	2025-08-27
Kristen Raisinghani	Wheaton	IL	60189	United States	2025-08-27
Jillian Becker	Naperville	IL	60540	United States	2025-08-27
Cathy Harding	Wheaton	IL	60189	United States	2025-08-27
Laura Malee	Wheaton	IL	60188	United States	2025-08-27
Wendy Harrison	Chicago	IL	60602	United States	2025-08-27
MICHAEL SANTANGELO	Glen Ellyn	IL	60137	United States	2025-08-27
Andjela Subotic	Wheaton	IL	60189	United States	2025-08-27
Melinda Bossenga	Elburn	IL	60119	United States	2025-08-27
Sreekala Thangamani	Naperville	IL	60563	United States	2025-08-27
Mary. Ann Reed	Elmhurst	IL	60126	United States	2025-08-27
Maria Podio	Downers grove	IL	60517	United States	2025-08-27

Karen Erickson	Elmhurst	IL	60126	United States	2025-08-27
Christine Pinne	Wheaton	IL	60189	United States	2025-08-27
Sam Pureza	Naperville	IL	60563	United States	2025-08-27
Pamela Schlegel	Wheaton	IL	60189	United States	2025-08-27
Lynn Kubat	Glen Ellyn	IL	60137	United States	2025-08-27
Ally Pixler	Chicago	IL	60641	United States	2025-08-27
tiffany palmer	Warrenville	IL	60555	United States	2025-08-27
Colleen Berk	Wheaton	IL	60187	United States	2025-08-27
Denise Pfaucht	Arlington Heights	IL	60189	United States	2025-08-27
Robin Schmidt	Naperville	IL	6063	United States	2025-08-27
Steven Hodges	Naperville	IL	60540	United States	2025-08-27
Diane Fischer	Wheaton	IL	60187	United States	2025-08-27
Brita Schmidt	Naperville	IL	60563	United States	2025-08-27
Joseph Bay	Lisle	IL	60532	United States	2025-08-27
Terri Olson	Naperville	IL	60563	United States	2025-08-27
Christy Class	Winfield	IL	60190	United States	2025-08-27
Maribeth Ladage	Independence	MO	64057	United States	2025-08-27
Jenni Ford	Aurora	IL	60504	United States	2025-08-27
Debi Hughes	Wheaton	IL	60189	United States	2025-08-27
Michele Hogan	Chicago	IL	60619	United States	2025-08-27

Melanie Bottom	Lancaster	PA	17603	United States	2025-08-27
Christy Phanthavong	Wheaton	IL	60189	United States	2025-08-27
Mike Mashburn	Warrenville	IL	60555	United States	2025-08-27
Rick Busse	Wheaton	IL	60189	United States	2025-08-27
Laura Lynn	Carol Stream	IL	60188	United States	2025-08-27
Mary Vrskovy	Warrenville	IL	60555	United States	2025-08-27
Melissa Lulik	West Chicago	IL	60185	United States	2025-08-27
Michelle Winters	Wheaton	IL	60189	United States	2025-08-27
Debbie Sandstrom	Chicago	IL	60602	United States	2025-08-27
Kristin Blue	Naperville	IL	60540	United States	2025-08-27
Jeff Swanson	Fairfax	VA	22032	United States	2025-08-27
Heather Baker	Wheaton	IL	60189	United States	2025-08-27
Nicole Linke	Milwaukee	WI	53228	United States	2025-08-27
Emily Adams	Lake Zurich	IL	60047	United States	2025-08-27
Lisa EALES	Naperville	IL	60540	United States	2025-08-27
Kaely Kodidek	Glen Ellyn	IL	60101	United States	2025-08-27
Richard Reed	Villa Park	IL	60181	United States	2025-08-27
Cathy Beverley	Naperville	IL	60563	United States	2025-08-27
Erin Barker	Chicago	IL	60643	United States	2025-08-27
Eileen Berg	Saint Paul	MN	55104	United States	2025-08-27

Walter Huff	Lombard	IL	60148	United States	2025-08-27
Kimberly Kasper	Darien	IL	60561	United States	2025-08-27
Kimberly patterson	Mount Prospect	IL	60056	United States	2025-08-27
Lisanne Barnes-Seymour	Naperville	IL	60540	United States	2025-08-27
Z A	Glen Ellyn	IL	60137	United States	2025-08-27
Kari Wiggins	Warrenville	IL	60555	United States	2025-08-27
Michael Lane	Lisle	IL	60532	United States	2025-08-27
Tiffany Kolar	Warrenville	IL	60555	United States	2025-08-27
Vikki Heinz	Elmhurst	IL	60126	United States	2025-08-27
Michael Hurley	Naperville	IL	60540	United States	2025-08-27
Sarah Hoctor	Wheaton	IL	60189	United States	2025-08-27
Frances Kelly	Morton Grove	IL	60053	United States	2025-08-27
Anand Setlur	Naperville	IL	60540	United States	2025-08-27
Christina Hoogestraat Hoogestraat	Warrenville	IL	60555	United States	2025-08-27
Brad Pinne	Wheaton	IL	60189	United States	2025-08-27
Sonia Cajigas	Alsip	IL	60803	United States	2025-08-27
Kally Loomis	Naperville	IL	60514	United States	2025-08-27
Cheryl Pagar	Wheaton	IL	60189	United States	2025-08-27
Dawn Zebic	North Aurora	IL	60542	United States	2025-08-27
Amanda Lissak	Winfield	IL	60190	United States	2025-08-27

Andrew Bshen	Elmhurst	IL	60126	United States	2025-08-27
Kenneth Schmidt	Naperville	IL	60563	United States	2025-08-27
Amy Tavolino	Glen Ellyn	IL	60137	United States	2025-08-27
Jan Taylor	Homer Glen	IL	60491	United States	2025-08-27
William Mayer	Wheaton	IL	60189	United States	2025-08-27
Lenice Abbott	Glen Ellyn	IL	60137	United States	2025-08-27
Carrie Olson	Warrenville	IL	60555	United States	2025-08-27
Kelly Collins	Wheaton	IL	60189	United States	2025-08-27
Elyssa Kinn	Wheaton	IL	60189	United States	2025-08-27
LINDA RODRIGUEZ	Naperville	IL	60563	United States	2025-08-27
Wanda Zachary	Plainfield	IL	60585	United States	2025-08-27
Kathryn Kroger	Woodridge	IL	60148	United States	2025-08-27
John Hopkins	Carpentersville	IL	60110	United States	2025-08-27
Arvind Setlur	Houston	TX	77066	United States	2025-08-27
Jerry Tavolino	Chicago	IL	60606	United States	2025-08-27
Michael Vogelgesang	Harvey	IL	60426	United States	2025-08-27
Kristin Fisch	Warrenville	IL	60555	United States	2025-08-27
Sarah Reul	Naperville	IL	60540	United States	2025-08-27
Amod Setlur	Portola Valley	CA	94028	United States	2025-08-27
Theresa Leifert	Chicago	IL	60647	United States	2025-08-27

Donna Miciunas	Neshkoro	WI	54960	United States	2025-08-27
McKenna Meyer	Cicero	IL	60804	United States	2025-08-27
Candice Meath	Winfield,	IL	60139	United States	2025-08-27
Shannon Hormanski	Downers Grove	IL	60515	United States	2025-08-27
Sarah Callison	Warrenville	IL	60555	United States	2025-08-27
Dominique Crowe	Villa Park	IL	60181	United States	2025-08-27
Beth Henry	Naperville	IL	60540	United States	2025-08-27
Carrie Bush	Warrenville	IL	60555	United States	2025-08-27
Marc Callison	Warrenville	IL	60556	United States	2025-08-27
Kyla Mercer	Glen Ellyn	IL	60137	United States	2025-08-27
David Crosby	Naperville	IL	60540	United States	2025-08-27
Mary Jage	Naperville	IL	60540	United States	2025-08-27
Liting Liu	Warrenville	IL	60555	United States	2025-08-27
Mindy Miller	Wheaton	IL	60187	United States	2025-08-27
Kevin Hickey	Warrenville	IL	50555	United States	2025-08-27
Gloria Otto	St Charles	IL	60174	United States	2025-08-27
Jody Gosain	Chicago	IL	60189	United States	2025-08-27
A Cleveland	Glen Ellyn	IL	60137	United States	2025-08-27
Melissa Simmons	Chicago	IL	60623	United States	2025-08-27
john Michael kyser	Westmont	IL	60559	United States	2025-08-27

Imran Gosla	wheaton	IL	60189	United States	2025-08-27
Vince Evola	Woodridge	IL	60517	United States	2025-08-27
Anthony Dunn	Glendale Heights	IL	60139	United States	2025-08-27
Starships Aramburu	Warrenville	IL	60555	United States	2025-08-27
Iffat Memon	Naperville	IL	60563	United States	2025-08-28
Terri Baebler	Wheaton	IL	60189	United States	2025-08-28
Melly Schwartz	Chicago	IL	60618	United States	2025-08-28
Carolyn Barnes	Wheaton	IL	60187	United States	2025-08-28
Srivatsan Chakravarti	Chicago	IL	60602	United States	2025-08-28
Puneet Sarup	Naperville	IL	60565	United States	2025-08-28
Mohan Kumar	Chicago	IL	60602	United States	2025-08-28
Sannidhi Mohan	Aurora	IL	60502	United States	2025-08-28
Katie Dehnke	Lombard	IL	60148	United States	2025-08-28
Megan Burress	Naperville	IL	60564	United States	2025-08-28
Molly Blumberg	Chicago	IL	60647	United States	2025-08-28
Amy Bonselaar	Wheaton	IL	60189	United States	2025-08-28
Adrianna Tan	Naperville	IL	60540	United States	2025-08-28
Marie Tan-Jones	Champaign	IL	61821	United States	2025-08-28
Alyson Wozniak	Glen Ellyn	IL	60137	United States	2025-08-28
Julie Jancius	Wheaton	IL	60187	United States	2025-08-28

Luke Murray	Chicago	IL	60646	United States	2025-08-28
Tiffany Crosby	Naperville	IL	60540	United States	2025-08-28
Joseph Stacho	Naperville	IL	60563	United States	2025-08-28
Robert Colby	Monee	IL	60449-7117	United States	2025-08-28
Diana Bielawski	Orland Park	IL	60462	United States	2025-08-28
Lindsey Lichtenberg	Chicago	IL	60639	United States	2025-08-28
Josephine Beckmann	Elmhurst	IL	60126	United States	2025-08-28
Frank pfeffer	Wheaton	IL	60189	United States	2025-08-28
Katherine Lodge	Warrenville	IL	60555	United States	2025-08-28
Elisa Smith	Naperville	IL	60564	United States	2025-08-28
Michelle Freyer	Glen Ellyn	IL	60137	United States	2025-08-28
Julie Miller	Wheaton	IL	60189	United States	2025-08-28
Kathy Walgamuth	Downers Grove	IL	60515	United States	2025-08-28
Renee Weber	Wheaton	IL	60189	United States	2025-08-28
Brian Barrett	New Albany	IN	47150	United States	2025-08-28
Stacey Martinez	Warrenville	IL	60555	United States	2025-08-28
Janine Shimp	Wheaton	IL	60189	United States	2025-08-28
Sara Przybylski	Aurora	IL	60506	United States	2025-08-28
Liz Magnier	Chicago	IL	60611	United States	2025-08-28
Amy Nickels	Warrenville	IL	60555	United States	2025-08-28

Iva Patel	Naperville	IL	60572	United States	2025-08-28
STEVE OHNSMAN	South Haven	MI	49090	United States	2025-08-28
Sergio Siguenza	Wheaton	IL	60189	United States	2025-08-28
Brittany Boyer	Bensenville	IL	60106	United States	2025-08-28
Holly Miller	Batavia	IL	60510	United States	2025-08-28
Raissa Vargas	Wheaton	IL	60189	United States	2025-08-28
David Branigan	Oak Forest	IL	60452	United States	2025-08-28
Jamie Wilson	Carol Stream	IL	60188	United States	2025-08-28
Catherine Clarkin	Naperville	IL	60540	United States	2025-08-28
Sadie Schwefel	Chicago	IL	60618	United States	2025-08-28
Ioretta rogalny	Warrenville	IL	60555	United States	2025-08-28
Justin Kaminski	Naperville	IL	60540	United States	2025-08-28
Theresa Kocan	Naperville	IL	60563	United States	2025-08-28
Linda Alvarez	Chicago	IL	60623	United States	2025-08-28
Migdalia Fernandez	Joliet	IL	60431	United States	2025-08-28
Nick Battaglia	Warrenville	IL	60555	United States	2025-08-28
Michael Kodak	Warrenville	IL	60555	United States	2025-08-29
Emily Larson	Glen Ellyn	IL	60137	United States	2025-08-29
Michael Karl	Glen Ellyn	IL	60137	United States	2025-08-29
Susan Schusler	Warrenville	IL	60555	United States	2025-08-29

Robin Hackenbruch	Warrenville	IL	60555	United States	2025-08-29
Gail Ernst	Warrenville	IL	60555	United States	2025-08-29
Connor Bonam	Plainfield	IL	60585	United States	2025-08-29
Jennifer Lee	Warrenville	IL	60555	United States	2025-08-29
Jane Nelsen	Warrenville	IL	60555	United States	2025-08-29
Courtney Merritt	Warrenville	IL	60555	United States	2025-08-29
Thomas Gredell	Hanover Park	IL	60133	United States	2025-08-29
Anna Mirasar	Lisle	IL	60532	United States	2025-08-29
Christa Metz	Naperville	IL	60654	United States	2025-08-29
Megumi Shimada Hejka	Chicago	IL	60439	United States	2025-08-29
Rodney Kennedy	CARTERSVILLE	GA	30120	United States	2025-08-29
Parth Bhagat	Naperville	IL	60563	United States	2025-08-29
Nate Hutchins	Wheaton	IL	60189	United States	2025-08-29
Jenn Sereque	Downers Grove	IL	60515	United States	2025-08-29
Molly Fraser	Aurora	IL	60506	United States	2025-08-29
Daniela Arias	Naperville	IL	60564	United States	2025-08-29
Ricky Patel	Naperville	IL	60564	United States	2025-08-29
Karina Siniavina	Naperville	IL	60564	United States	2025-08-29
April Kelly	Lisle	IL	60532	United States	2025-08-29
Josh Kettell	Chicago	IL	60602	United States	2025-08-29

Megan Zorn	Wheaton	IL	60189	United States	2025-08-29
Catherine Hejka	Bolingbrook	IL	60440	United States	2025-08-29
Alicia Edwards Jackson	Chicago	IL	60602	United States	2025-08-29
Carlene Mogavero	Downers Grove	IL	60515	United States	2025-08-29
Kesara Chism	LaSalle	IL	61301	United States	2025-08-29
Hannah J	Milwaukee	WI	53206	United States	2025-08-29
Kate Vermeulen	Chicago	IL	60657	United States	2025-08-29
Xiang Li	Naperville	IL	60564	United States	2025-08-29
Harrison Linden	Aurora	IL	60504	United States	2025-08-29
Jessica Six	Chicago	IL	60613	United States	2025-08-29
Manu Mishra	Chicago	IL	60613	United States	2025-08-29
Amantha Sotiropoulos	Chicago	IL	60657	United States	2025-08-29
Nikki Piquette	Chicago	IL	60641	United States	2025-08-29
Dev Lutchman	Chicago	IL	60640	United States	2025-08-29
Mary Wall	Chicago	IL	60618	United States	2025-08-29
Mary Richardson	Chicago	IL	60618	United States	2025-08-29
Renata Wrzesinski	Aurora	IL	60504	United States	2025-08-29
Kathleen Richardson	Naperville	IL	60540	United States	2025-08-29
Ashley Taylor	Naperville	IL	60565	United States	2025-08-29
Lynn Gosselin	Naperville	IL	60540	United States	2025-08-29

Jessica Hannan	Chicago	IL	60614	United States	2025-08-29
Quinton Coble	Chicago	IL	60605	United States	2025-08-29
Chris Synal	Naperville	IL	60540	United States	2025-08-29
Alec Garrett	Chicago	IL	60657	United States	2025-08-29
Anna Novak	Chicago	IL	60632	United States	2025-08-29
Ted Bourlard	Willow Springs	IL	60480	United States	2025-08-29
Emily Schur	Naperville	IL	60540	United States	2025-08-29
Larry Gryziak	Naperville	IL	60565	United States	2025-08-29

Kopinski, Sara

From: Egner, Therese
Sent: Tuesday, September 2, 2025 11:52 AM
To: Kopinski, Sara
Subject: FW: Karis Data Center

Hi, Sara! This public comment came through POD for DEV-0057-2025.

Therese Egner

Assistant Planner | Planning & Development - TED Business Group
City of Naperville | 400 S. Eagle St. Naperville, IL 60540
(630) 420-4179 | egnert@naperville.il.us

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From: Matt Adams <[REDACTED]>
[REDACTED]
To: Planning <Planning@naperville.il.us>
Subject: Karis Data Center

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I'm a resident of Naperville, and I'm writing regarding the proposed Karis Critical Naperville Data Center development. I have no concerns about the variances that are being requested, and ambivalent on this specific proposed data center itself, but do have concerns with the incredible electrical demand this project will have.

Given the massive electrical demand that will be required, I agree with the reported staff position of waiting to approve phase 2. If the project is approved, I'd also like to see some requirements that the project include renewable energy generation on-site to the maximum extent possible. Options such as solar panels on buildings and solar canopies over all parking and loading areas, while a drop in the bucket for what the center will likely use, should be required to offset something. Finally, there should be

some consideration that ensures electricity rates aren't raised for the rest of Naperville residents as a result of this project, something that has happened with the construction of other data centers nationwide.

Matt Adams

Kopinski, Sara

From: Kopinski, Sara
Sent: Tuesday, September 2, 2025 3:24 PM
To: 'bruck010@alumni.umn.edu'
Subject: RE: David Bruck B/C Comment Form

Thank you for submitting comments on DEV-0057-2025, Karis Critical Data Center. Your comments will be emailed to the Planning and Zoning Commissioners in advance of the upcoming September 3rd Public Hearing for their consideration.

Sara Kopinski

Planning Supervisor | Planning & Development - TED Business Group
City of Naperville | 400 S. Eagle St. Naperville, IL 60540
(630) 420-6075 | kopinskis@naperville.il.us

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From: speakersignup@naperville.il.us <speakersignup@naperville.il.us>
Sent: Tuesday, September 2, 2025 10:39 AM
To: Speaker Sign Up <speakersignup@naperville.il.us>
Subject: B/C Comment Form

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Name	David Bruck
City/State	Naperville, IL
Group/Organization	No
Board/Commission	Building Review Board
Meeting Date	09/03/2025

Participation Type	Support/Oppose
Comment Only - Agenda Item	
Comment Only - Comment	
Support/Oppose	Oppose
Support/Oppose - Agenda Item	DEV-0057-2025

Name: **David Bruck**

Email: [REDACTED]

Phone: [REDACTED]

Acknowledgement: **Acknowledge Yes**

Kopinski, Sara

From: Egner, Therese
Sent: Tuesday, September 2, 2025 3:53 PM
To: Kopinski, Sara
Subject: FW: Petition DEV-0057-2025

FYI- Please see this public comment regarding DEV-0057-2025.

Therese Egner

Assistant Planner | Planning & Development - TED Business Group
City of Naperville | 400 S. Eagle St. Naperville, IL 60540
(630) 420-4179 | egnert@naperville.il.us

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From: Jeffrey Gahris <[REDACTED]>
Sent: Tuesday, September 2, 2025 3:51 PM
To: Planning <Planning@naperville.il.us>
Subject: Petition DEV-0057-2025

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The River Prairie Group of the Sierra Club (Group), which has members in DuPage County, respectfully wish to make comments on the proposed data center at the former Alcatel Lucent site in Naperville. The Group's Executive Committee has deliberated the matter and is concerned about imminent impacts associated with the operation of a data center at this site.

Our group is concerned about the large electricity and water-cooling requirements that all data centers have. Naperville is already engaged in a community debate about its contract for the procurement of electricity through IMEA. The contract has limited the ability of Naperville to shift toward cleaner sources of electricity. The large increases in electrical demand anticipated from data centers will likely make the shift toward lower

carbon dioxide-emitting electrical generation sources more difficult for Naperville. We are also concerned about the impact the data center would have on grid reliability and how large amounts of heated water would be managed. For example, will hot water be discharged into municipal sewers or stormwater systems? What would be the volume of this discharge? Data centers are notorious for draining local water resources.

We are also very concerned about the health impacts associated with diesel engine generators, which are commonly employed for data centers. In this instance, the petition filed by Karis Critical Member, LLC, does not make it clear how many diesel generators there will be, how large they will be, and the expected operating times for routine testing to assure the units will be operational in the event of a power outage. We anticipate these units will be larger and more impactful than typical back-up generators used by office buildings. Diesel generators emit a variety of pollutants including small particulates, nitrogen oxides, and carbon monoxide. It is well established that diesel emissions contribute to asthma and other respiratory effects. Children are particularly vulnerable to these pollutants. Despite these concerns, the petition does not address how the diesel generator emissions will be limited or controlled. Moreover, generators of this type can be very loud when operating. It is not clear how the noise will be managed and be in compliance with any applicable noise ordinance. We note that while the Alcatel Lucent site is part of an office building corridor, there are nearby residential neighborhoods.

Lastly, we are pleased that downward directed lighting will be used and that Karis Critical Member conducted a photometric analysis. We ask that lighting on this site be warm colored and no brighter than truly necessary in accordance with Dark Sky International's outdoor lighting principles.

Thank you for the opportunity to comment on the petition.

Jeff Gahrns, Chair

River Prairie Group, Sierra Club

Kopinski, Sara

From: Egner, Therese
Sent: Tuesday, September 2, 2025 3:56 PM
To: Kopinski, Sara
Subject: FW: Data Center Proposal

FYI- A public comment for DEV-0057-2025.

Therese Egner

Assistant Planner | Planning & Development - TED Business Group
City of Naperville | 400 S. Eagle St. Naperville, IL 60540
(630) 420-4179 | egnert@naperville.il.us

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From: Farah Babar <[REDACTED]>
Sent: Tuesday, September 2, 2025 3:55 PM
To: Planning <Planning@naperville.il.us>
Subject: Data Center Proposal

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Hello,

I'm writing as a concerned citizen of the Naper Commons neighborhood. I moved to this neighborhood in August 2022 and since then my family(husband, 3 kids and my mother) have loved getting to know the neighbors and enjoying the natural surroundings of the Danada Forest Preserve. My husband and I really enjoy the location of our neighborhood given its easy access to the I-88 highway.

Living in the city of Naperville has always been a highlight for us, given its prestige with the number one suburb in all of America. When we first heard about the data center construction, we were really

surprised and taken aback that Naperville would even allow such an addition to our beautiful community.

On any given date, are you drive to our neighborhood, you'll see many people walking their dogs, pushing their multiple children in strollers or children out on their bikes and scooters. We love how we are tucked away and there's not much extra traffic that flows through the neighborhood for their safety.

The construction of 2 Data Center buildings would have many negative impacts on not only the community nearby but also ecological impacts to the many species that call this home. Even my seven-year-old twins were very concerned about the construction of these buildings when we discussed the potential impact if you could have.

We urge you to vote no on the proposal of the Karis Critical (Case #: DEV-0057-2025) for the well being of the residents and city of Naperville to maintain its appeal to current and future residents.

-Farah Babar


Naperville, IL 60563

Kopinski, Sara

From: Egner, Therese
Sent: Tuesday, September 2, 2025 4:30 PM
To: Kopinski, Sara
Subject: FW: Public Hearing for Data Center

FYI- A public comment for DEV-0057-2025.

Therese Egner

Assistant Planner | Planning & Development - TED Business Group
City of Naperville | 400 S. Eagle St. Naperville, IL 60540
(630) 420-4179 | egnert@naperville.il.us

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From: Patrice Basso <[REDACTED]>
Sent: Tuesday, September 2, 2025 4:22 PM
To: Planning <Planning@naperville.il.us>
Subject: Public Hearing for Data Center

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To the Planning Commission Members:

I looked over the enormous amount of information regarding the proposed data centers.

However, I was unable to find any reference to the power needs of this proposal-

- 1) What is the plan to provide electricity to these centers?
- 2) How much power (Megawatt hours) from the Naperville Electric Utility will be needed to run these centers?

3) Right now, Naperville doesn't have a set plan to source its own electrical needs once the IMEA contract runs out. I understand that it is in the process of negotiating with IMEA for more renewable energy sources, etc. But I don't know if it's a good idea to commit to local data centers before we know what the city's future, consistent source of power will be and when it will be determined.

With regards to noise, I could not tell from the noise study, what the level would be if all 48 generators had to run in case of an emergency. One of the data centers in Aurora recently had to use their generators for an extended time period and residents complained about the noise.

Thank you for your time,
Sincerely,

████████████████████
████████████████████
Naperville,IL

From: Elizabeth Pham [REDACTED]
Sent: Tuesday, July 29, 2025 12:34 PM
To: Longenbaugh, Allison <LongenbaughA@naperville.il.us>; White, Benny <WhiteB@naperville.il.us>; Holzauer, Ian <Ian.Holzauer@naperville.il.us>; McBroom, Josh <McBroomJ@naperville.il.us>; Wilson, Nate <WilsonN@naperville.il.us>; Kelly, Patrick <KellyP@naperville.il.us>
Subject: Concern Regarding Proposed Data Center in Naperville

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Dear Naperville City Council Members,

I hope this message finds you well. My name is Liz Pham, and I am a Naperville resident living in Naper Commons which is adjacent to the vacant land where a data center has recently been proposed by the Nokia campus.

I am writing to express my deep concern about this potential development. The idea of a large-scale data center being built so close to our homes raises many questions and uncertainties for residents like myself, especially in terms of environmental impact, noise, heat output, property value implications, and long-term infrastructure strain. I know that these concerns are shared with most, if not all, other residents in our neighborhood.

The letter attached is greatly concerning knowing that the sale was to a real estate company that deals primarily with creating data centers. With the sale to Karis, can no other development be made besides a data center?

I would greatly appreciate your guidance on the following:

1. **What is the current timeline for decision-making on this proposal?**
2. **What steps can residents take to voice our opposition and prevent the data center from being approved or constructed?**

As someone who chose this neighborhood for its peaceful residential character, I'm deeply invested in preserving its quality of life. I would welcome any opportunity to be part of the discussion or public forums where this matter is addressed.

Thank you for your attention and for representing the concerns of Naperville residents. I look forward to hearing from you.

Thanks,

Liz

From: City of Naperville Citizen Support <napervilleil@mycusthelp.net>
Sent: Thursday, July 31, 2025 1:43 PM
To: Pruneda, Rachel <PrunedaR@naperville.il.us>
Subject: Citizen Question Submissions for Mayor/Council (GovQA Reference # W290320-073125)

Citizen Support Center (GovQA) Mayor/Council Submission

You are receiving this email to alert you that a new Mayor/Council submission has been created and assigned to you.

Contact Name: Hyacinth Vincent

Customer Name: Hyacinth Vincent

Email: [REDACTED]

Phone: [Phone]

Reference Number: W290320-073125

Create Date: 7/31/2025 1:42:15 PM

Status: New Request

Request Type:

Question/Concern

Description:

I am writing to firmly voice our community's deep concerns and strong opposition to the construction of a data center near the forest preserve and within our neighborhood. This proposal threatens the unique character, environmental balance, and long-term health of our town—values we believe must be preserved at all costs.

We specifically chose this area because of its serene surroundings, close proximity to the forest preserve, and its reputation as a quiet, nature-focused place to raise families. A data center of this scale is simply not compatible with the spirit or infrastructure of our neighborhood. The industrial noise, constant truck traffic, increased utility demands, and potential environmental hazards stand in stark contrast to the peaceful residential and natural setting we now enjoy.

This location is not just geographically ill-suited—it's symbolically wrong. Placing a massive facility next to a cherished green space sends a troubling message about the priorities of our town. We must ask: why compromise our most treasured asset—our environment—for a facility that offers minimal direct benefit to local residents? The long-term impacts on air quality, water runoff, wildlife corridors, and even property values have not been addressed transparently. And once the forest edge is disturbed, it cannot be restored.

We are not against progress or technology, but we believe it must be placed responsibly, away from sensitive ecosystems and residential areas. There are other more appropriate zones for such development that would not threaten the character or livability of our town.

We urge the council to reconsider this plan and defend the integrity of our neighborhood and the forest preserve. Let's preserve the vision and values that brought us here in the first place.

Click the link below to review and/or respond to the submission.



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Kopinski, Sara

From: Iwicki, Brad
Sent: Monday, August 4, 2025 3:06 PM
To: Kopinski, Sara
Subject: FW: Extreme resident concern over proposed data center at 1960 Lucent Lane
Attachments: Data Center.txt

Hi Sara,

Please see the public comment related to the data center below. You can find the original email in the Planning Inbox.

Thank you,

Brad Iwicki

Assistant Planner | Planning & Development – TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 305-7021 | iwickib@naperville.il.us

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From: Fayette Powers <[REDACTED]>
Sent: Friday, August 1, 2025 2:46 PM
To: Planning <Planning@naperville.il.us>
Subject: Fwd: Extreme resident concern over proposed data center at 1960 Lucent Lane

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RE: 8/20/2025 Planning and Zoning Commission meeting

Data centers... Given that the noise, air pollution, and other data center impacts can extend into nearby

residential areas and beyond, they should be classed/zoned as heavy industrial. According to CEDS (Community and Environmental Defense Services)

----- Forwarded message -----

From: **Fayette Powers** [REDACTED]

Date: Fri, Aug 1, 2025 at 11:57 AM

Subject: Extreme resident concern over proposed data center at 1960 Lucent Lane

To: <syeda@naperville.il.us>, <wehrlis@naperville.il.us>, <gibsonm@naperville.il.us>, <holzhauseri@naperville.il.us>, <kellyp@naperville.il.us>, <longenbaugha@naperville.il.us>, <mcbroomj@naperville.il.us>, <whiteb@naperville.il.us>, <wilsonn@naperville.il.us>

The residents of the Naper Commons neighborhood in very close proximity to this proposed project have significant concerns.

A data center proposal should only be considered after a thorough analysis of each potential impact has been made available to decision-makers as well as area residents and other interested parties. We would expect that the assessment will be accurate and unbiased if it is conducted by an independent party hired by the decision-making body using funds provided by the applicant-developer. The analysis should prove that the data center will not cause adverse impacts, such as noise, beyond the data center property line.

Given that the noise, air pollution, and other data center impacts can extend into nearby residential areas and beyond, they should be classed/zoned as heavy industrial.

I have used as a resource CEDS (Community and Environmental Defense Services) to outline a number of concerns and our expectations of you, our local government officials. Please see the attachment.

It is disappointing that neighboring residents have been left largely uninformed of this proposed project. A few neighbors received a letter in the mail from the attorneys of Karis Critical regarding an open house/informational session scheduled for the evening of Tuesday, August 5th. In this letter they state, "Karis Critical has submitted plans to the city of Naperville for redevelopment of the Property as a data center campus. We anticipate the project will run through the city's formal development process in the coming months."

Neighboring residents deserve not only information, but to be a part of the decision-making process.

Sincerely,

Fayette Powers Wernick
[REDACTED]

A data center proposal should only be considered after a thorough analysis of each potential impact has been made available to decision-makers as well as area residents and other interested parties. It is more likely that the assessment will be accurate and unbiased if it is conducted by an independent party hired by the decision-making body using funds provided by the applicant-developer. The analysis should prove that the data center will not cause adverse impacts, such as noise, beyond the data center property line.

To increase the likelihood that a proposed data center will not become a troublesome neighbor, consider asking your local elected officials to require the applicant-developer provide a listing of existing data centers that:

Resemble the facility proposed near your home,

Employs the same impact mitigation measures proposed to protect you and your neighbors,

Were built by the same developer proposing the facility near you, and

Will be operated by the same party as that which will take over the building upon completion.

There are reports that disturbing noise levels can extend up to 3,000 feet from some data centers and less disturbing noise may be detected as far away as two miles. A portion of data center noise appears to be low frequency which we may not hear but can still affect our health and well-being. To learn more about low-frequency (bass) noise from one data center and possible health effects see the WUSA9 Science of data center noise news video at: <https://www.youtube.com/watch?v=Jf1FFqbZ1X8>

Again, it appears that excessive noise has been documented at some data centers; not all. To increase the likelihood that a proposed data center will not create noise interfering with your quality of life and that of your neighbors, consider calling for:

Cooling with closed loop water systems, not air-cooling, and

Locating diesel generators inside buildings with highly-effective sound reduction measures. Better yet, maximize the use of onsite battery storage to minimize the need to run diesel generators when line voltage is insufficient.

Generators should be fully enclosed within a building that has highly-effective (full acoustical enclosures) sound proofing. If homes, schools, and other sensitive uses are only located on one side of a proposed data center then generators should be positioned on the opposite side so the building mass can reduce noise impacts.

Battery backup systems could also serve to minimize the amount of time generators run during an emergency. While solar, wind, and other on-data-center-site clean-energy sources may not be sufficient to meet all power needs, they can recharge batteries that then reduce the duration of diesel generator operation.

Diesel generator emissions can pose a threat to the health of area residents if they run at times other than during rare emergencies. Diesel exhaust particulates contain over 40 known cancer-causing organic substances.

Independent Noise Impact Study Essential

A data center proposal should only be considered after a thorough noise impact analysis has been made available to decision-makers as well as all area residents and other interested parties. The analysis should be conducted by an independent party hired by the decision-making body but paid for by the applicant. The analysis should prove that the data center will not cause noise levels that exceed applicable standards at the data center property line.

As with noise, consider calling upon decision-makers to require the applicant to first demonstrate that they are making maximum use of battery systems to minimize the need for diesel- or gas-powered generators. Additionally, the applicant should provide the funds for retaining an independent expert to assess the potential health impacts if any diesel generators will serve as a backup power source.

Water Supply Impacts

All data centers need a cooling system. Cooling by air or water are the most common. A single water-cooled data center may need a half-million gallons per day unless it is a closed loop system where only 5% of the volume is lost per year. Another issue with systems that are not closed loop is the thermal and other pollution impacts of cooling water discharged to a stream or other aquatic resource. The discharged cooling waters may contain anti-fouling chemicals that could have a toxic or other pollutional impact to receiving waters.

Given the noise impact of air-cooling, all data centers should be water cooled with a closed-loop system. If for some reason closed-loop water cooling is rejected then insist on an independent assessment of potential impacts such as:

If the cooling water source will be an underground aquifer, then will the data center withdrawal cause water levels to drop to a point that other users can no longer obtain enough water? This would be especially critical issue if area homes and other users obtain water from relatively shallow wells.

If a surface body like a lake, reservoir, river or even a stream will be the data center water source then will the withdrawal exceed the safe or sustainable yield of the water body? Safe or sustainable yield is the amount of water that can be withdrawn without adversely affecting aquatic ecosystems or other water users.

If a data center will use water from a public system, then will it cause water pressure to drop below that needed for fire suppression and other uses?

Note that some jurisdictions require data center applicants to consider using wastewater for cooling. If a data center is proposed near a sewerline or wastewater treatment plant then this option should be considered with the data center developer covering all associated costs.

All residents could be forced to pay higher electricity bills if data center developers-owners are not required to pay for new transmission lines or other infrastructure needed to accommodate these facilities. For example, an analysis by Dominion Energy indicated that doubling peak energy capacity largely to accommodate data center proliferation could cause energy bills for all Virginia households to skyrocket 120% by 2039.

Given that the noise, air pollution, and other data center impacts can extend into nearby residential areas and beyond, they should be classed as heavy industrial.

If data centers are allowed in light industrial or even some commercial zoning districts then an additional permit should be required that triggers a more in depth and open review process. The permit may be called a Special Exception, Conditional Use, or Special Use. These permits usually require:

Public notice to nearby residents and others via a letter, signs, etc.,

More detailed impact studies especially noise,

Required findings that the data center will not harm nearby residents,

A public hearing, and

An opportunity to appeal an unfavorable decision to the local elected body (town council, county supervisors, etc.).

The zoning ordinance might also include use standards such as:

To minimize noise impacts, require closed loop water cooling and diesel generators in heavily sound-proofed enclosures,

Data center buildings should be at least 300 feet from residential property lines,

The data center site should have highly-effective (95% opacity) visual buffers that screen not just the building but the security (prison-looking) perimeter fence, substations, and other objectionable features from the view of nearby homes,

To prevent glare into nearby homes, data center lighting should conform to the Five Principles for Responsible Outdoor Lighting from Dark Sky International,

To reduce diesel pollution generators should be Tier 4 or possibly Tier 2 generators with selective catalytic reduction systems or, if practical, use of alternative (lower-impact) fuels such as hydrotreated vegetable oil (HVO),

A portion, though preferably all, of data center electricity is contracted to come from solar, wind, or other clean energy sources. While onsite solar should be considered it can only

provide a portion – not all – of the necessary electricity:. Here’s why: 0.13 megawatt (MW) of electricity per solar acre x 48-acre average data center site = 6.2 MW vs. the 20- to 100-MW needed by a data center.

Onsite battery systems can reduce the amount of time diesel generators must run when line voltage is insufficient,

Data centers should meet environmental management standards such as the International Organization for Standardization’s (ISO) 14001 standard, and

Certification by the Regional Transmission Organization (RTO) that sufficient power is available so diesel generators will be rarely needed and only during a true emergency.

Kopinski, Sara

From: Egner, Therese
Sent: Wednesday, August 6, 2025 7:09 AM
To: Kopinski, Sara
Subject: FW: VOTE NO ON THE DATA CENTER

Hi, Sara! This public comment came in through POD for Karis Critical.

Therese Egner

Assistant Planner | Planning & Development - TED Business Group
City of Naperville | 400 S. Eagle St. Naperville, IL 60540
(630) 420-4179 | egnert@naperville.il.us

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From: Becca Bogle <[REDACTED]>
Sent: Tuesday, August 5, 2025 10:11 PM
To: Planning <Planning@naperville.il.us>
Subject: VOTE NO ON THE DATA CENTER

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I am deeply frustrated with the city of Naperville possibly approving this data center off of warrenville road in naperville. We chose to live in Naperville in our new subdivision Naper Commons because of the beauty of the forest preserve. I am INFURIATED to think that the city of Naperville would promote such pollution and want to DECREASE our home value. We have worked hard to establish a residence, build a home for our kids and I REFUSE to live next to A DATA center. These are all the reasons I will be VOTING AGAINST this.

The amount of energy needed is drastic and I do not want it to directly increase my electrical bill, along with our power grid not being able to support such amounts.

WATER CONSUMPTION— I am not interested in having a scarcity of water.

and #1 AIR QUALITY— its giving FLINT MICHIGAN. I refuse to have my home polluted by a data center. I am beyond frustrated with the city of Naperville. I hope it does not come to this, however I do have a strong presence on social media (40,000 followers) and will be sharing about the downfall of the city of Naperville if this Data Center gets approved.

I strongly am against this decision, and I hope our city of naperville board members will VOTE NO on approving this data center, as it has ZERO benefit to the public and only provides a PAY OFF for the individuals voting yes, so they can cover up the negative affects of a data center in the community.

Becca Bogle

Content Creator & Personal Stylist



Kopinski, Sara

From: Planning
Sent: Wednesday, August 6, 2025 9:11 AM
To: Kopinski, Sara
Subject: FW: Please Oppose the Proposed Data Center Near Naper Commons

FYI

Adam Beaver, AICP

Community Planner | Planning & Development - TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 420-4193 | beavera@naperville.il.us

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From: Ryan Olsen <[REDACTED]>
Sent: Wednesday, August 6, 2025 7:35 AM
To: Holzhauser, Ian <Ian.Holzhauser@naperville.il.us>; Longenbaugh, Allison <longenbaugha@naperville.il.us>; Syed, Ashfaq <SyedA@naperville.il.us>; Wilson, Nate <WilsonN@naperville.il.us>; Gibson, Mary <GibsonM@naperville.il.us>; Kelly, Patrick <KellyP@naperville.il.us>; McBroom, Josh <McBroomJ@naperville.il.us>; White, Benny <whiteb@naperville.il.us>; Wehrli, Scott <WehrliS@naperville.il.us>; Planning <Planning@naperville.il.us>
Subject: Please Oppose the Proposed Data Center Near Naper Commons

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Dear Mayor Wehrli, Council Members, and Planning & Zoning Commission,

My Name is Ryan Olsen and I am writing as a concerned resident to urge you to **oppose the proposed data center near the Naper Commons development**. While I understand the need for economic development in Naperville, this proposal presents serious concerns that threaten the character, safety, and value of nearby residential communities.

Councilman Ian Holzhauer is right to oppose this project, and I applaud his leadership. I respectfully call on the rest of the Council and the Mayor to reconsider their support for this proposal for the following reasons:

1. Incompatible with Surrounding Residential Areas

The proposed data center site is directly adjacent to multiple established and growing residential neighborhoods, including **Naper Commons, Indian Hills, the newly developing Northwoods of Naperville**, and areas bordering the **Danada Forest Preserve**. These are high-quality communities with **\$500,000+ homes and townhomes**. Placing a massive industrial facility near these neighborhoods directly undermines the investments homeowners have made in Naperville's west side. Residents in the townhomes closest to Naperville road will be less than a few hundred feet from the site.

2. Guaranteed Loss of Property Value

It is virtually guaranteed that this data center will **devalue nearby properties**. Industrial development of this scale—bringing noise, heat, diesel exhaust, and 24/7 operations—will deter future buyers and erode the equity of existing homeowners. Residents who have invested heavily in these communities now face the unacceptable risk of diminished property values as a direct result of city-sanctioned development.

3. Environmental and Quality-of-Life Concerns

The **Danada Forest Preserve**, a treasured natural space, will also feel the effects of this development. Increased heat, air, and noise pollution from cooling systems and generators will disrupt the ecological balance of the area and impact wildlife and trail use. The quality of life for residents who value outdoor recreation and a peaceful neighborhood environment will be significantly compromised.

4. Limited Community Benefit

Data centers offer **very few permanent jobs** and contribute little to the local economy beyond tax revenue. In contrast, they impose long-term infrastructure demands and create burdens for residents without improving the community's day-to-day life. Simply put, this is a poor tradeoff.

5. Better Locations Are Available

Naperville has designated **industrial corridors** far better suited for this type of development. Choosing to place this facility next to high-value neighborhoods and preserved natural space is short-sighted and sets a **troubling precedent** for future development decisions.

We urge the Council and Mayor to put the well-being of residents first. Naperville's strength has always come from its thriving neighborhoods, green space, and thoughtful planning—not from prioritizing industrial use over community quality of life.

Please stand with the residents of **Naper Commons, Indian Hills**, and future residents of **Northwoods of Naperville**, and all those who care about protecting our investments and environment. Follow Councilman Holzhauser's lead and vote **NO** on this project.

Sincerely,

Ryan Olsen



Kopinski, Sara

From: Egner, Therese
Sent: Thursday, August 7, 2025 2:39 PM
To: Kopinski, Sara
Subject: FW: Concerned Resident-Please REJECT Proposed Data Center

Hi, Sara! This public comment for Karis came in POD today.

Therese Egner

Assistant Planner | Planning & Development - TED Business Group
City of Naperville | 400 S. Eagle St. Naperville, IL 60540
(630) 420-4179 | egnert@naperville.il.us

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From: Steve Jarvis <[REDACTED]>
Sent: Thursday, August 7, 2025 2:28 PM
To: Wehrli, Scott <WehrliS@naperville.il.us>; Holzhauer, Ian <Ian.Holzhauer@naperville.il.us>; Longenbaugh, Allison <LongenbaughA@naperville.il.us>; Syed, Ashfaq <SyedA@naperville.il.us>; Wilson, Nate <WilsonN@naperville.il.us>; Gibson, Mary <GibsonM@naperville.il.us>; Kelly, Patrick <KellyP@naperville.il.us>; McBroom, Josh <McBroomJ@naperville.il.us>; White, Benny <WhiteB@naperville.il.us>; Planning <Planning@naperville.il.us>
Subject: Concerned Resident-Please REJECT Proposed Data Center

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Dear Mayor Wehrli and Council Members,

My name is Steve Jarvis, and I am writing as a very concerned Naperville resident and President of the Naper Commons Homeowners Association. I urge you to oppose the proposed data center near the Naper Commons development at the intersection of Naperville and Warrenville Roads.

This project poses a serious threat to the character, safety, and property values of our residential

communities. Councilman Ian Holzhauser has rightly opposed this proposal, and I strongly encourage the rest of the Council and the Mayor to follow his lead and reject this development.

Here are my primary concerns:

1. Incompatible with Residential Neighborhoods

The proposed site borders established and growing communities, including Naper Commons, Indian Hills, Northwoods of Naperville, and land adjacent to the Danada Forest Preserve. These are family-oriented neighborhoods where residents have invested in a peaceful, safe environment. A large industrial data center within a few hundred feet of these homes is an unacceptable encroachment.

2. Impact on Property Values

Homes in our neighborhoods are valued at over \$600,000, reflecting their quality and desirability. The noise, 24/7 operations, diesel exhaust, and industrial presence of this data center will inevitably reduce property values and undermine residents' investments.

3. Safety and Traffic Concerns

Many families with young children live here. Increased construction and operational traffic on roads not designed for heavy industrial use will increase safety risks and disrupt the quiet, livable atmosphere we expect.

4. Strain on Power Infrastructure and Work-from-Home Disruption

Data centers consume massive amounts of electricity, putting strain on our local power grid. This threatens power reliability for residents, many of whom work remotely and depend on stable, quiet environments. Noise from generators and cooling systems will further disrupt home offices and daily life.

5. Environmental Harm to Danada Forest Preserve

The nearby preserve will suffer from increased heat, noise, and air pollution, negatively affecting wildlife and recreational use of the trails.

6. Limited Community Benefits

This facility will create few permanent jobs and offers little beyond tax revenue. The burdens it imposes far outweigh the minimal benefits to our community.

7. More Suitable Locations Exist

Naperville has designated industrial zones designed for such facilities. Placing this data center adjacent to residential neighborhoods and protected green spaces is short-sighted and risks setting a damaging precedent.

I urge you to prioritize the quality of life, safety, and property values of Naperville residents over this ill-conceived project. Please stand with the families of Naper Commons, Indian Hills, Northwoods, and all neighbors who value our community's character and environment. Vote NO on the proposed data center at Naperville/Warrenville Roads.

Thank you for your attention to this critical matter.

Sincerely,
Steve Jarvis

Very Concerned Naperville Resident
President, Naper Commons Homeowners Association

Kopinski, Sara

From: Egner, Therese
Sent: Monday, August 11, 2025 9:02 AM
To: Kopinski, Sara
Subject: FW: Data Center Naperville i88 Corridor

Hi, Sara! This public comment came in for Karis Critical. Hope you had a nice weekend!

Therese Egner

Assistant Planner | Planning & Development - TED Business Group City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 420-4179 | egnert@naperville.il.us

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-----Original Message-----

From: Jake Hildenbrand [REDACTED]
Sent: Friday, August 8, 2025 1:56 PM
To: Planning <Planning@naperville.il.us>
Subject: Data Center Naperville i88 Corridor

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Planning/Zoning Committee,

I'm writing you today as another concerned Naperville citizen. We have had an outpouring of issues with the new data center being proposed on the north-side of Naperville.

There are a number of things that have been discussed in the community so far and no one is pleased with it being built in our backyards. We currently live in Naper Commons and would like to understand why the push for a data center is best for Naperville. And the tax revenue that is generated from it seems to be the only positive we can come up with. And the worst part is, that revenue isn't even used to benefit our families and children because we are forced to attend Wheaton school districts while living in Naperville. I have always had a positive view of the City of Naperville being raised

here and having family in Naperville since the 40's, but this new development doesn't seem to serve a purpose besides revenue generation.

Naperville is one of the wealthiest areas in the western suburbs and has a high standard of living throughout. It has great schools and great community. I believe this data center development is strictly thought of as a tax revenue generator.

It is concerning with the relative size and energy consumption of data centers that Naperville would approve something so close in proportion to the Forest Preserve and natural area of Herrick Lake. According to the Illinois Constitution; Article XI, Section 1 clearly states that it is public policy of the state to provide and maintain a healthy environment for future generations. We as a community have the right to a healthy environment which I'm sure a data center is going to negatively effect the area surrounding it due to resources and generator pollution. It is unacceptable to ignore the fact that in most cases data centers have created issues in communities and their surrounding natural environments.

Has the issue of noise and diesel pollution come up in conversation. It would be important to nail down noise restrictions on being in place with communities being built so close to this designated area. 9am-5pm of standard business hours would be the only time generators could be checked and ran. It's also important to follow and enforce the same decibel requirements throughout the entire city of Naperville. This data center should have no exception to this rule. The water consumption will undoubtedly increase with a data center running at full capacity daily; and the water bill and municipality's supply of water will be restricted to nearby communities during operation. It would also be unfair to see an increase in water bills for Naperville communities due to a data center pulling large capacities of water every hour.

Overall I think it's important to ask Naperville communities for their opinions and keep us informed because it's the city councils duty to make decisions with families and communities best interest in mind. That alone has made the City of Naperville great today. Focusing on adding tax revenue to the books has not made Naperville prosperous over the decades. Keeping communities strong and loyal to the area has continued to push Naperville forward.

Please review the above points and respond with updates and plans for future talks about this data center. I appreciate the transparency in your responses and to keep Naperville families in mind.

Best,

Jacob Hildenbrand

██████████
████████████████████

Kopinski, Sara

From: Egner, Therese
Sent: Tuesday, August 12, 2025 3:12 PM
To: Kopinski, Sara
Subject: FW: Regarding Case DEV-0057-2025

Hi Sara! Please see public comment for DEV-0057-2025, Karis Critical.

Therese Egner

Assistant Planner | Planning & Development - TED Business Group
City of Naperville | 400 S. Eagle St. Naperville, IL 60540
(630) 420-4179 | egnert@naperville.il.us

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From: Lori A Melhart, LCSW [REDACTED]
Sent: Tuesday, August 12, 2025 3:05 PM
To: Planning <Planning@naperville.il.us>
Subject: Regarding Case DEV-0057-2025

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To the Naperville Planning and Zoning Commission:

Regarding Case DEV-0057-2025 – Public Notice of Application by Karis Critical, LLC, concerning the Nokia property (identified by the parcel numbers listed in the public notice), I am writing to express my **significant concerns**. This proposal, which seeks approval for a conditional use to allow the operation of a data center campus, a variance for reduced parking, a variance for an increased equipment yard screen wall height, and a variance for an increased security fence height to 8 feet, will be

discussed at the Public Hearing before the Naperville Planning and Zoning Commission on Wednesday, August 20, 2025, at 7:00 p.m. in the Council Chambers at the Naperville Municipal Center, 400 S. Eagle Street, Naperville, Illinois.

The plan involves the construction of two 211,000 square foot data centers. While it is presented as economic development, this project poses **serious, permanent risks to our community, environment, and quality of life**. These impacts cannot be fully mitigated and will be irreversible once built.

A critical issue is the **lack of detailed information needed for a thorough assessment**. We have not received disclosures regarding **primary or backup power sources, total energy draw, or grid impact, and the power study has not been shared with the public**. There's insufficient information about the **stated cooling method, water source, estimated consumption, or potential future changes**. A **stormwater management plan and environmental impact statement** are missing, as is an assessment of **habitat loss or effects on neighboring forest preserves**. Furthermore, no projections for permanent jobs or tax revenue have been provided. Without these details, the public and the city cannot fully assess the risks or benefits of this proposal.

I have significant concerns about the potential consequences of this project. It threatens **permanent environmental damage through the destruction of green spaces and habitats near forest preserves, the alteration of the local microclimate due to heat discharge from servers and cooling systems, and the annual use of millions of gallons of water for cooling, which risks future water shortages**.

There are also serious **health and safety risks**. Diesel generator emissions (particulate matter, nitrogen oxides, sulfur dioxide) are linked to respiratory illness and cancer. The noise from cooling systems and generators could disrupt sleep and well-being, and light pollution would alter neighborhood character and night sky visibility.

The proposal also poses a **strain on our infrastructure**, with potential overloading of the local power grid, increased stormwater runoff and flooding risk from massive impermeable surfaces, and significant traffic increases during construction and operation.

From an economic and community perspective, I am concerned about a **decline in our property values** due to industrial-scale development, limited permanent job creation relative to the project's scale, and the loss of land that could be used for community-benefiting projects.

Finally, there is a distinct lack of transparency. There has been no disclosure of the ultimate customer(s) or long-term commitments, the ownership or lease/purchase agreements are unclear, and there is no guarantee that the site won't be abandoned if the operator leaves.

I strongly believe that no amount of "conditions" can fully mitigate these risks. Once built, the impacts of two 211,000 square foot data centers will be permanent and irreversible. I urge the City of Naperville Planning and Zoning Commission to **deny Case DEV-0057-2025 in its entirety** to protect the health, safety, and quality of life of its residents.

Thank you for your time and consideration of this urgent matter.

Lori A. Melhart, LCSW

[REDACTED]

she/her/ella

All are welcome here!

Sent with [Proton Mail](#) secure email.

Kopinski, Sara

From: Iwicki, Brad
Sent: Wednesday, August 13, 2025 4:57 PM
To: Kopinski, Sara
Subject: FW: Opposition to proposed data center next to Naper Commons in Naperville

FYI – Data Center

Brad Iwicki

Assistant Planner | Planning & Development – TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 305-7021 | iwickib@naperville.il.us

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From: aashna taneja <[REDACTED]>
Sent: Wednesday, August 13, 2025 4:51 PM
To: Planning <Planning@naperville.il.us>
Subject: Opposition to proposed data center next to Naper Commons in Naperville

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I'm a homeowner at Napercommons townhomes, literally adjacent to the proposed data center site. Our community is brand new, within District 203, and many families (mine included) paid a premium to live here for the schools, safety, and proximity to the forest preserve. Siting an industrial-scale data center in the middle of a residential neighborhood and sensitive open space is fundamentally incompatible with the character, safety, and expectations of this area. I respectfully ask the City to deny the proposal.

Key Concerns

1. Land-Use Incompatibility & Comprehensive Plan

- A high-intensity, 24/7 industrial use conflicts with adjacent single-family/townhome residences and forest preserve uses.
- The visual massing, continuous operations, and ancillary infrastructure (substation, chillers, generators) do not belong on a neighborhood edge.

2. Noise & Vibration

- Constant mechanical noise (cooling towers/chillers), backup generator testing, and truck traffic will erode quality of life.
- Nighttime noise carries; low-frequency hum and tonal noise are especially disruptive to sleep and children.

1. Air Quality & Emissions

- Backup diesel generators and construction activity increase particulate matter and NOx.
- Fuel storage on site introduces spill risk and odors during exercising/testing cycles.

1. Water Use, Thermal Discharge & Stormwater

- Large cooling loads may strain municipal water, potentially raising costs or stressing supply during heat waves.
- Evaporative systems can create visible plumes and chemical drift from water treatment.
- Added impervious area increases runoff; failure risks flooding for homes downhill.

2. Light Pollution & Heat Island

- Security lighting and building glow degrade dark skies and affect wildlife and sleep hygiene.
- Large paved and mechanical areas raise local ambient temperatures.

1. Wildlife & Forest Preserve Interface

- Habitat fragmentation, fencing, and round-the-clock activity disrupt adjacent preserves and corridors.
- Stormwater or chemical releases threaten sensitive species.

1. Safety, Trespass & Security

- Industrial sites attract trespass/curiosity; perimeter security can push foot traffic into our yards and common areas.
- Fuel and battery energy storage (if proposed) introduce fire/hazard risks near homes and a school district full of children.

2. Property Values & Equity

- This community paid premium pricing with the expectation of residential compatibility. An industrial neighbor will depress values and shift burdens to current taxpayers

3. Grid Impacts

- High, concentrated electrical demand can drive costly grid upgrades and increase outage risk for nearby residents.

Thank you

Aashna Taneja

Kopinski, Sara

From: Egner, Therese
Sent: Thursday, August 14, 2025 9:01 AM
To: Kopinski, Sara
Subject: FW: DATA CENTER CONCERNS

Hi Sara,

This public comment for Karis Critical came in POD.

Thank you!

Therese Egner

Assistant Planner | Planning & Development - TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 420-4179 | egnert@naperville.il.us

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From: Desmond [REDACTED]
Sent: Wednesday, August 13, 2025 4:48 PM
To: Holzhauer, Ian <Ian.Holzhauer@naperville.il.us>; Syed, Ashfaq <SyedA@naperville.il.us>; Wilson, Nate <WilsonN@naperville.il.us>; Gibson, Mary <GibsonM@naperville.il.us>; McBroom, Josh <McBroomJ@naperville.il.us>; Kelly, Patrick <KellyP@naperville.il.us>; White, Benny <WhiteB@naperville.il.us>; Wehrli, Scott <WehrliS@naperville.il.us>; Planning <Planning@naperville.il.us>; Longenbaugh, Allison <LongenbaughA@naperville.il.us>
Subject: DATA CENTER CONCERNS

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Dear Mayor Wehrli and Council members,

We are writing you to express our deep concern regarding the proposed Data Center near the Naper Commons development. We recently became residents of Naperville to enjoy our retirement

years. The proposed Data Center presents serious concerns that threaten the character, safety and value of our nearby residential communities.

We align with councilman Ian Holzhauer to oppose the project and ask the remaining council members and Mayor Wehrli to reconsider their support for this proposal for the concerns noted above.

According to the Daily Herald, the proposed Data Center for Naperville is approximately 600,000 sf. The Bloomberg Report stated that a recent 200,000sf Data Center proposed for VA could use as much energy as 30,000 homes. How exactly will this affect us? Also, the report stated that Data Centers use more electricity than most countries. Noise and the cost of electricity are also concerns.

We did not move to Naperville in 2023 to be living adjacent to a Data Center and have our property value decline.

Please stand with the residents of Naper Commons and all those who care about protecting our investment and environment and vote NO on the Data Center project.

Charles and Charyn Desmond

Kopinski, Sara

From: Planning
Sent: Monday, August 18, 2025 9:20 AM
To: Kopinski, Sara
Subject: FW: Objection to DEV-0057-2025 In re Karis Critical Member, LLC
Attachments: signed_Objection to DEV-0057-2025 In re Karis Critical Member, LLC .pdf; AI's Hidden Threat to Public Health - IEEE Spectrum.pdf

Hi Sara,

See below and attached public comment for the data center.

From: Wilton Person <[REDACTED]>
Sent: Sunday, August 17, 2025 11:41 AM
To: Planning <Planning@naperville.il.us>
Subject: Objection to DEV-0057-2025 In re Karis Critical Member, LLC

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Dear Planning & Zoning Commission,

Please find correspondence attached for your review. Please confirm receipt.

Sincerely,

Wilton Person

August 17, 2025

To: The Naperville Board and Zoning Commission

Objection to DEV-0057-2025 In re Karis Critical Member, LLC

The purpose of this letter is not only to object to Petitioner Karis Critical Member's request for conditional approval of DEV-0057-2025 but to request that the City of Naperville ban data centers until such time that the environmental and health impact of data center operations can be fully researched and documented. Although my family currently lives less than a ½ mile from the proposed data center, recent research supports that the air pollution caused by data centers would be far reaching beyond the immediate area of the data centers. See attached: *We Need to Talk About AI's Impact on Public Health Data-Center Pollution is linked to asthma, heart attacks, and more.*

By now, members of the Board and Zoning Commission have read the hundreds of comments and letters from Naperville residents objecting to this data center project based upon serious concerns related to noise pollution, air pollution, heavy stress on electricity and water use, harm to wildlife in the DuPage County Forest Preserve, quality of life concerns, and decreased property valuations.

My objection and ban request is based upon all of these reasons referenced above. However, my primary concern is based upon the irreparable public health harm that would be caused by air pollution as referenced in the attached article. It would be short-sighted for Naperville to mortgage the future health of its residents including children attending District 203 schools by approving a data center project that would expose Naperville residents to an increase in air pollution that would exacerbate respiratory conditions, increase public health costs, and likely result in premature deaths.

Unlike a proposed prison, mining operations, or other projects that are clearly undesirable on their face, the harm caused by the data centers may be less obvious but more insidious. The data centers will be windowless warehouses surrounded by high fences that strain Naperville's electricity and water resources while simultaneously creating harmful noise and air pollution.

The reality is that the health and quality of life of Naperville residents and the numerous children who attend District 203 are priceless and no amount of increased revenues or revenues specifically earmarked to District 203 are worth jeopardizing the health and quality of life for Naperville residents. Further, the negative impact on the environment and the wildlife that make the DuPage County Forest Preserve their home also supports a unanimous denial of this project. There are hundreds of better uses of this property that would positively impact the quality of life for Naperville residents.

I am requesting that the Board and Zoning Commission deny conditional approval for DEV-0057-2025 and that the City of Naperville pass an ordinance that bans future proposed data centers within the City of Naperville.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Person".

Wilton A. Person
Naperville Resident

IEEE Spectrum

OPINION AI

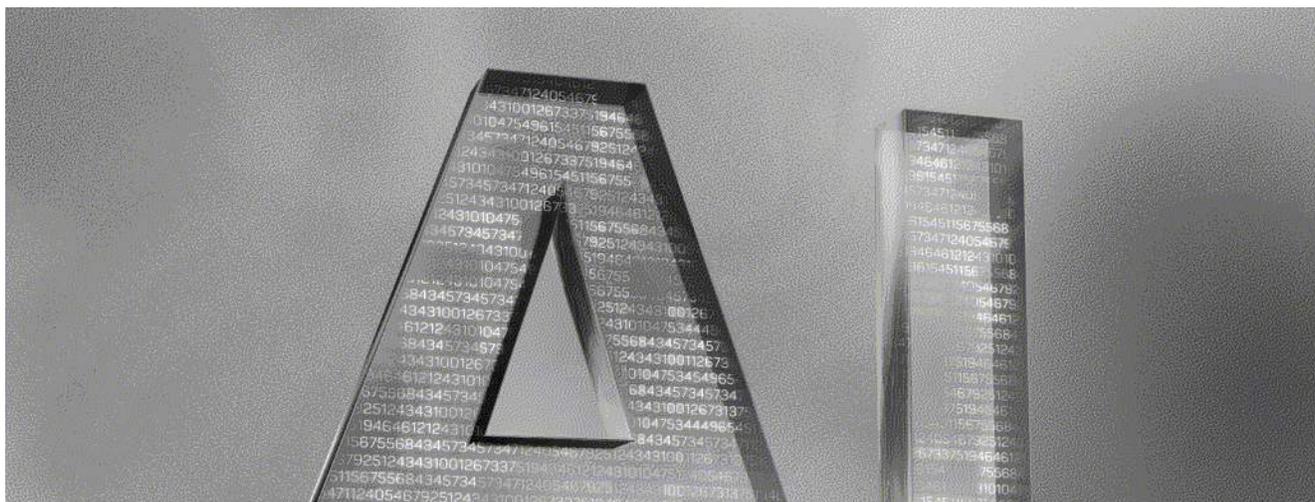
We Need to Talk About AI's Impact on Public Health > Data-center pollution is linked to asthma, heart attacks, and more

BY ADAM WIERMAN SHAOLEI REN

01 MAY 2025

Adam Wierman is the Carl F. Braun professor of computing and mathematical sciences at Caltech.

Shaolei Ren is an associate professor of electrical and computer engineering at the University of California, Riverside.



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MANAGE PREFERENCES

MOST PEOPLE HAVE HEARD ABOUT THE environmental impact of today's AI boom, stemming from sprawling data centers packed with power-hungry servers. In the United States alone, the demand for AI is projected to push data-center electricity consumption to 6.7 to 12.0 percent of the nation's total by 2028. By that same date, water consumption for cooling these data-center facilities is predicted to double, or even quadruple, compared to the 2023 level.

But many people haven't made the connection between data centers and public health. The power plants and backup generators needed to keep data centers working generate harmful air pollutants, such as fine particulate matter and nitrogen oxides (NOx). These pollutants take an immediate

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Because ambient air pollution is a “silent killer.” While concerns about the public health impacts of data centers, including potential links to cancer rate increases, are beginning to surface, most AI-model developers, practitioners, and users simply aren’t aware of the serious health risks tied to the energy and infrastructure powering modern AI systems.

The Danger of Ambient Air Pollution

Ambient air pollution is responsible for approximately 4 million premature deaths worldwide each year. The biggest culprit are tiny particles 2.5 micrometers or less in diameter (referred to as PM 2.5), which can travel deep into the respiratory tract and lungs. Along with high blood pressure, smoking, and high blood sugar, air pollution is a leading health risk factor. The World Bank estimates the global cost of air pollution at US \$8.1 trillion, equivalent to 6.1 percent of global gross domestic product.

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With the danger of this pollution well established, the question becomes: How much is AI responsible for? In our research as professors at Caltech and the University of California, Riverside, we've set out to answer that question.

Quantifying the Public Health Cost of AI

To ensure that AI services are available even during grid outages, data centers rely on large sets of backup generators that usually burn diesel fuel. While the total operation time of backup generators is limited and regulated by local environmental agencies, their emission rates are high. A typical diesel generator can release 200 to 600 times more NOx than a natural gas power plant producing the same amount of electricity.

A recent report by the state of Virginia revealed that backup generators at Virginia's data centers emitted about 7 percent of what permits allowed in 2023. According to the U.S.

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data centers maxed out their permitted emissions.

Further compounding the public health risk, a large set of data-center generators in a region may operate simultaneously during grid outages or grid shortages as part of demand-response programs, potentially triggering short-term spikes in PM_{2.5} and NO_x emissions that are especially harmful to people with lung problems.

Next, let's look beyond the backup generators to the supply of energy from the grid. The bulk of the electricity powering AI data centers comes from power plants that burn fossil fuels, which release harmful air pollutants, including PM 2.5 and NO_x. Despite years of progress, power plants remain a leading source of air pollution in the United States.

We calculated that training a single large generative AI model in the United States, such as Meta's Llama 3.1, can produce as much PM 2.5 as more than 10,000 round trips by car between Los Angeles and New York City.

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California's 30 million vehicles.

Why Carbon and Energy Efficiency Aren't the Whole Story

To date, efforts to mitigate AI's environmental footprint have focused mostly on carbon emissions and energy efficiency. These efforts are important, but they may not alleviate health impacts, which strongly depend on where the emissions occur.

Carbon anywhere is carbon everywhere. The climate impact of carbon dioxide is largely the same no matter where it's emitted. But the health impact of air pollution depends heavily on regional factors such as local sources of energy, wind patterns, weather, and population density.

Even though carbon emissions and health-damaging air pollutants have some shared sources, an exclusive focus on cutting carbon does not necessarily reduce, and could even

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costs by 2.8 percent.

Likewise, focusing solely on energy efficiency can reduce air pollutant emissions, but doesn't guarantee a decrease in health impact. That's because training the same AI model using the same amount of energy can yield vastly different health outcomes depending on the location. Across Meta's U.S. data centers, we've found that the public health cost of training the same model can vary by more than a factor of 10.

We Need Health-Informed AI

Supply-side solutions, such as using alternative fuels for backup generators and sourcing electricity from clean fuels, can reduce AI's public health impact, but they come with significant challenges.

Clean backup generators that offer the same level of reliability as diesel are still limited. And despite advancements in renewable energy, fossil fuels remain deeply embedded in the

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Globally, the share of coal and other fossil fuels in electricity generation has remained nearly flat over the past four decades, underscoring the difficulty of entirely changing the energy supply that powers data centers.

We believe that demand-side strategies that consider the spatial and temporal variations in health impacts can provide effective and actionable solutions immediately. These strategies are particularly well-suited for AI data centers with substantial operational flexibility. For example, AI training can often run at any available data centers and typically do not face hard deadlines, so those jobs can be routed to locations or deferred to times that have less impact on public health. Similarly, inference jobs—the work a model does to create an output—can be routed among multiple data centers without affecting user experience.

By incorporating public health impact as a key performance metric, these flexibilities can be harnessed to reduce AI's growing health burden. Crucially, this health-informed

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holds tremendous promise for advancing public health. For example, within the energy sector, AI can navigate the complex decision space of real-time power plant dispatch. By aligning grid stability with public health objectives, AI can help minimize health costs while maintaining a reliable power supply.

AI is rapidly becoming a public utility and will continue to reshape society profoundly. Therefore, we must examine AI through a public lens, with its public health impact as a critical consideration. If we continue to overlook it, the public health cost of AI will only grow. Health-informed AI offers a clear path forward for advancing AI while promoting cleaner air and healthier communities.

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Kopinski, Sara

From: Egner, Therese
Sent: Tuesday, August 19, 2025 10:02 AM
To: Kopinski, Sara
Subject: FW: Karis Critical – 1960 Lucent Lane – Case DEV-0057-025

Hi, Sara! This public comment for DEV-0057-2025 came in POD.

Therese Egner

Assistant Planner | Planning & Development - TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 420-4179 | egnert@naperville.il.us

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From: [REDACTED]
Sent: Monday, August 18, 2025 8:15 PM
To: Planning <Planning@naperville.il.us>; wehrli.s@naperville.il.us; Longenbaugh, Allison <LongenbaughA@naperville.il.us>; Holzauer, Ian <Ian.Holzauer@naperville.il.us>; Syed, Ashfaq <Syeda@naperville.il.us>; Wilson, Nate <WilsonN@naperville.il.us>; Gibson, Mary <GibsonM@naperville.il.us>; Kelly, Patrick <KellyP@naperville.il.us>; McBroom, Josh <McBroomJ@naperville.il.us>; White, Benny <WhiteB@naperville.il.us>
Subject: Karis Critical – 1960 Lucent Lane – Case DEV-0057-025

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Dear Planning & Zoning Commission and City Council Members,

I'm writing as a concerned Naperville resident regarding the proposed data center development near Warrenville Road and Naperville Road. I understand there are potential economic benefits of such a project, and I also believe it's essential to carefully consider the long-term impact on our community's quality of life, infrastructure, and cost of living.

Noise Concerns Data centers are known to produce significant noise from backup generators, rooftop chillers, and HVAC systems. In nearby Aurora, residents living near the CyrusOne facility have reported persistent noise disruptions, including vibrations and sleepless nights. Noise carries, and as a resident of North Naperville, I already hear a great deal of noise, even at night, just from traffic both near and distant, so additional noise from a data center is a realistic concern.

- Could a detailed **Noise Impact Assessment** be conducted for this site? Including information on how far the sound carries? And comparative data to help parties understand the true effect.
- Will **backup generators** be tested regularly, and if so, during what hours?
- How often will the facility need to run its own power generators, and for how long each time?
- Are **chillers and HVAC units** planned for outdoor installation?
- What **sound mitigation strategies** (e.g., acoustic wraps, sound walls) will be implemented, and what research is there to support how successful they are?

Electricity Usage Data centers consume enormous amounts of electricity, which can strain local grids and potentially raise rates for residents. I understand the city has approved a study to assess grid impact.

- What is the **estimated electricity demand** at full capacity? How does that compare to the business that was previously at this location?
- Will the developer contribute a sufficient amount to **grid upgrades or renewable energy offsets**?
- Could this project affect **residential utility rates** or delay sustainability goals?
- Could this project result in residents experiencing periods of power loss or reduction of power available?

Water Consumption Cooling systems can use millions of gallons of water daily, raising concerns about sustainability and environmental impact.

- Will the facility use **evaporative cooling**, or more efficient alternatives like **liquid or immersion cooling**?
- What is the **projected daily water usage**, and how will wastewater be handled?
- Because water use in data centers is potentially unusually large, could a **Water Impact Assessment** be conducted, and are there **conservation plans** in place?
- Does Naperville's current **contractual allocation of Lake Michigan water** allow for this level of industrial usage?
- Will our water and sewer systems need upgrades to handle the large flow of water and wastewater? If so, will the developer contribute a sufficient amount toward those upgrades?
- Could the data center's water demand lead to **restrictions on residential water use** during peak periods or drought conditions? Or lead to increases in residential water and sewer rates?

I strongly urge the city to require full transparency from the developer and to prioritize the health, peace, and sustainability of our neighborhoods. I appreciate the opportunity to attend future public hearings and stay informed about this project's progress.

Thank you for your time and consideration.

Sincerely,
Kathy Kirman

Kopinski, Sara

From: Egner, Therese
Sent: Tuesday, August 19, 2025 10:02 AM
To: Kopinski, Sara
Subject: FW: Formal Request to Negotiate a Community Benefits Agreement for the Karis Critical Data Center Project (Case # DEV-0057-2025)

Hi Sara, this public comment for DEV-0057-2025 came in POD!

Therese Egner

Assistant Planner | Planning & Development - TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 420-4179 | egnert@naperville.il.us

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From: Jeesun Lim <[REDACTED]>
Sent: Tuesday, August 19, 2025 9:37 AM
To: Planning <Planning@naperville.il.us>
Subject: Formal Request to Negotiate a Community Benefits Agreement for the Karis Critical Data Center Project (Case # DEV-0057-2025)

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Dear Mr. Whitaker,

I am writing to you as a resident of Naperville whose home is immediately adjacent to the property at 1960 Lucent Lane, the proposed site for the Karis Critical Data Center Campus (Case # DEV-0057-2025).

I am deeply concerned about the disruptions and long-term impacts it may have on the quality of life for residents living near the construction site and the operational data center.

To address these concerns, I respectfully request that the following measures be considered and implemented to compensate and mitigate the impacts on our community:

1. Noise Reduction Measures:

- Installation of noise barrier fences around the data center perimeter to minimize noise pollution.
- Provision of soundproofing materials, such as double-glazed windows, for nearby residences.
- Implementation of noise-reducing technologies for HVAC systems and other equipment to ensure minimal disturbance.

2. Landscaping and Aesthetic Improvements:

- Enhanced landscaping around the data center, including planting trees, shrubs, and other vegetation to maintain the aesthetic appeal of the neighborhood.
- Design modifications to the data center buildings to ensure they are visually compatible with the surrounding residential area, using appropriate colors and materials.
- Measures to reduce light pollution, such as shielding outdoor lighting and minimizing nighttime glare.

3. Protection of Property Values - To safeguard our single largest investment, we propose:

- **A Property Value Guarantee Program**, including independent appraisals before and after construction, with a formal mechanism for compensating homeowners for any decline in property value.
- **A Guaranteed Purchase Offer Program** for residents who wish to sell their homes within a set period following the data center's completion.

4. Public Contributions and Infrastructure Investments:

- Allocation of funds from the data center project to improve local public amenities, such as schools, libraries, and parks.
- Investment in traffic management and road improvements to handle increased traffic associated with the data center.
- Creation of a community fund specifically for residents affected by the project, to be used for local initiatives or improvements.

5. Minimization of Construction Impact:

- Limitation of construction hours to minimize disruption to daily life (e.g., 8:00 AM to 5:00 PM, Monday through Friday).
- Implementation of dust and vibration control measures during construction to protect nearby homes.

- Designation of specific routes for construction vehicles to reduce traffic congestion in residential areas.

6. Transparency and Accountability: To ensure these commitments are met, we require:

- A commitment to annual public reporting on compliance with all terms of a Community Benefits Agreement (CBA), with financial penalties for non-compliance.

I believe these measures are reasonable and necessary to ensure that the benefits of this development are balanced with the well-being of our community. I urge you to work with Karis Critical to incorporate these requests into the project plan and to involve the community in the planning process to foster transparency and collaboration.

Thank you for your attention to this matter. I look forward to your response and am available to discuss these concerns further at your convenience.

Best Regards,

Jeesun Lim at [REDACTED]

Kopinski, Sara

From: Egner, Therese
Sent: Wednesday, August 20, 2025 9:07 AM
To: Kopinski, Sara
Subject: FW: Public Comment re: DEV-0057-2025

Hi Sara, this public comment came into POD for DEV-0057-2025.

Therese Egner
Assistant Planner | Planning & Development - TED Business Group City of Naperville | 400 S. Eagle St. Naperville, IL 60540
(630) 420-4179 | egnert@naperville.il.us

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-----Original Message-----

From: Grace Chen <[REDACTED]>
Sent: Tuesday, August 19, 2025 9:48 PM
To: Planning <Planning@naperville.il.us>
Subject: Public Comment re: DEV-0057-2025

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To whom it may concern:

As a resident who values clean air, green spaces, and a livable future for the next generation, I feel compelled to speak out against the proposed construction of new data centers in our community.

While I recognize the growing demand for digital infrastructure, we must not ignore the environmental consequences of these facilities. Data centers consume enormous amounts of electricity, often sourced from fossil fuels, and contribute significantly to greenhouse gas emissions. At a time when we should be accelerating our efforts to combat climate change, approving energy-intensive developments like this feels counterproductive.

Beyond energy use, data centers require vast quantities of water for cooling, which can strain local resources and ecosystems. The noise pollution, land disruption, and potential harm to wildlife are additional concerns that deserve serious attention.

I urge decision-makers to pause this proposal until a comprehensive environmental impact assessment is conducted and shared with the public. We need transparency, accountability, and a clear commitment to sustainability before moving forward.

Our community should be a leader in climate-conscious development. Let's make choices that reflect our values and protect the environment for generations to come.

Sincerely,
Grace Chen

Kopinski, Sara

From: Egner, Therese
Sent: Wednesday, August 20, 2025 9:05 AM
To: Kopinski, Sara
Subject: FW: DEV-0057-2025

Hi, Sara! This public comment for DEV-0057-2025 came in.

Therese Egner

Assistant Planner | Planning & Development - TED Business Group
City of Naperville | 400 S. Eagle St. Naperville, IL 60540
(630) 420-4179 | egnert@naperville.il.us

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From: Eso <[REDACTED]>
Sent: Tuesday, August 19, 2025 10:09 PM
To: Planning <Planning@naperville.il.us>
Subject: DEV-0057-2025

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Hello,

I am a Naperville resident born and raised. I am writing to submit a comment about DEV-0057-2025. I am strongly opposed to this development.

Data centers produce a continuous hum from the electronics within, often exceeding 60 decibels. The effects of constant noise pollution are well documented to be extremely bad for human health and for the wildlife.

Data centers draw an immense amount of energy, driving up the cost of electricity. In the Southwest, similar data centers have already driven up energy rates by 17% over the past decade.

Back-up generators pollute the air, and the water consumption requirements strain our infrastructure.

The construction would degrade the quality of life of the nearby residents, the nearby nature preserve, and our city. Please don't prioritize industry over people.

Thanks,
Jessica Ni

Name	Tom Akers
City/State	Wheaton, IL
Group/Organization	No
Board/Commission	Building Review Board
Meeting Date	09/03/2025
Participation Type	Comment Only
Comment Only - Agenda Item	Case #: DEV-0057-2025
Comment Only - Comment	<p>This comment is for the Planning and Zoning Commission.</p> <p>I believe the approval of the zoning variances proposed by this request should be tabled, pending review of both environmental impact, and strain on the electrical grid.</p> <p>The adjacent DuPage County Forest Preserves are a vital part of the community; we must ensure that they suffer no environmental impact. In addition, as a former employee in the electric generation and transmission industry, I need to point out the importance of studying, and publicly disseminating, impact studies to the local electric grid.</p> <p>Thank you for attention in this matter.</p> <p>Your impacted neighbor in Wheaton,</p> <p>Tom Akers</p>
Support/Oppose	
Support/Oppose - Agenda Item	

Name: **Tom Akers**

Email: [REDACTED]

Phone: [REDACTED]

Acknowledgement: **Acknowledge Yes**

Kopinski, Sara

From: Egner, Therese
Sent: Thursday, August 21, 2025 8:51 AM
To: Kopinski, Sara
Subject: FW: KARIS CRITICAL DATA CENTER (DEV-0057-2025)

Hi Sara, This is a public comment for DEV-0057-2025.

Therese Egner

Assistant Planner | Planning & Development - TED Business Group
City of Naperville | 400 S. Eagle St. Naperville, IL 60540
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From: Chandni Patel <[REDACTED]>
Sent: Wednesday, August 20, 2025 8:40 PM
To: Planning <Planning@naperville.il.us>
Subject: KARIS CRITICAL DATA CENTER (DEV-0057-2025)

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Data centers bring little to no value to the community while increasing pollution, electricity use and water use. As someone who works with data, I strongly opposed the building of new data centers. I believe we can use our resources in a more thoughtful way and encourage more sustainable solutions.

Kopinski, Sara

From: Egner, Therese
Sent: Thursday, August 21, 2025 8:53 AM
To: Kopinski, Sara
Subject: FW: Data center concerns - Naper Commons resident

Hi Sara, This is a public comment for DEV-0057-2025.

Therese Egner
Assistant Planner | Planning & Development - TED Business Group City of Naperville | 400 S. Eagle St. Naperville, IL 60540
(630) 420-4179 | egnert@naperville.il.us

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-----Original Message-----

From: Weronika Malek [REDACTED]
Sent: Wednesday, August 20, 2025 10:20 PM
To: Planning <Planning@naperville.il.us>
Subject: Data center concerns - Naper Commons resident

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Dear Naperville Planning and Zoning Commission,

My name is Weronika Malek-Lubawski and I'm a homeowner and resident of [REDACTED] I'm writing with some concerns regarding the proposed data center in the neighborhood's direct vicinity (Nokia campus/Warrenville road).

We're a residential neighborhood and bought our homes with an understanding that we'd be moving near office (Nokia) rather than industrial/loud (data center) buildings.

Over the last two years me and my husband developed a strong attachment to our neighborhood, a sense of community, and love for the Danada Forest Preserve. We love taking walks to the preserve and keep seeing a pair of

eagles (!), beavers, herons, turtles, ducks, and hares there. One of the ducks even felt safe enough to lay eggs near our house's porch and then safely walked her ducklings back to the preserve, which one of our neighbors caught on photos! We're currently expecting our first baby, and it's environment I hoped to share with my child. There's also many children and expecting families in the neighborhood.

We're concerned about the noise pollution coming from the data center and its effects both on us as residents and on the unique wildlife we have here—data center noises and frequencies might be different than what the animals are "used" to and I read articles and testimonies that state that even when data centers promise quiet operations, their monthly maintenance or unexpected repairs can be very loud. I'm not attaching links to this e-mail in case your filter blocks them but would be happy to share them.

Are there any noise level enforcements or guarantees that are currently planned in regards to the data center? Based on the residential/wildlife character of the neighborhood I'm opposed to it in general, but if it would happen in some capacity, I think such enforcements are absolutely necessary and need to be discussed at this stage.

I also reviewed the public proposal for the data center in which the developer mentions that their first building would be OK with the existing electric infrastructure, but the second would be "dependent" on availability. I'm worried that they would lobby for the second building regardless of its feasibility for our infrastructure, and that the overall exertion would cause the electric prices to rise in the city of Naperville.

Sincerely,
Weronika Malek-Lubawski, Ph.D.
Homeowner

Kopinski, Sara

From: Egner, Therese
Sent: Thursday, August 21, 2025 9:17 AM
To: Kopinski, Sara
Subject: FW: Protecting what makes Naperville home to families like ours

Hi Sara, this public comment to POD for DEV-0057-2025.

Therese Egner

Assistant Planner | Planning & Development - TED Business Group
City of Naperville | 400 S. Eagle St. Naperville, IL 60540
(630) 420-4179 | egnert@naperville.il.us

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From: [REDACTED]
Sent: Thursday, August 21, 2025 9:14 AM
To: Planning <Planning@naperville.il.us>
Cc: [REDACTED]
Subject: Protecting what makes Naperville home to families like ours

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Dear Ian Holzhauser, Patrick Kelly, Ashfaq Syed, and all City Council Members,

We are writing as Naperville residents to share our concerns regarding the proposed data center near Naper Commons.

We moved to Naper Commons in large part because it is backed by the forest preserves surrounding Herrick Lake. That proximity wasn't just about beauty or recreation — it represented environmental resilience and the promise of cleaner air, something deeply important to our family.

Our son Julian is 3 years old. He has a rare lung condition and depends on oxygen 24/7, as well as a BiPAP machine at night to breathe more easily. For him, even small changes in air quality are not an inconvenience — they are a threat to his health and wellbeing. There is hope that Julian may be able to outgrow aspects of his condition as he develops, but that depends in large part on the environment he grows up in — especially the quality of the air he breathes every day. Cleaner air gives him a chance to thrive; poorer air sets him back. And while we feel these impacts most acutely because of Julian, the reality is that air quality affects every Naperville resident. ***Poorer air contributes to higher rates of asthma, heart disease, and other chronic conditions across the community.***

While we understand the desire for economic growth, we question whether the benefits of a large data center truly outweigh the costs. These facilities consume vast amounts of resources and bring risks that extend far beyond a single neighborhood:

- Air quality and noise — Backup generators and cooling systems add emissions and noise, affecting vulnerable residents and the broader community.
- Energy strain and rising costs — Data centers require enormous amounts of electricity, which can strain the grid and contribute to higher rates for residents.
- Water usage — Many facilities use millions of gallons of water for cooling, raising serious sustainability concerns.
- Few jobs vs. impact — Despite their size, data centers provide relatively few permanent jobs compared to other types of development that could benefit Naperville.

Naperville has always been a place where families come for community, health, and access to nature. We urge you to protect that identity and carefully weigh whether this project aligns with the values that make Naperville the kind of place families like ours choose to call home.

Thank you for your dear time and thoughtful consideration. We deeply appreciate your commitment to Naperville's families.

Sincerely,

████████████████████

Naperville residents and parents

(We respectfully request that our names be kept confidential should our comments be shared publicly.)

Kopinski, Sara

From: Egner, Therese
Sent: Thursday, August 21, 2025 10:58 AM
To: Kopinski, Sara
Subject: FW: Please Oppose the Proposed Data Center Near Naper Commons

Planning received this follow-up response from a public comment for DEV-0057-2025!

Therese Egner

Assistant Planner | Planning & Development - TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 420-4179 | egnert@naperville.il.us

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From: Ryan Olsen <[REDACTED]>
Sent: Thursday, August 21, 2025 10:44 AM
To: Gibson, Mary <GibsonM@naperville.il.us>; Planning <Planning@naperville.il.us>
Subject: Re: Please Oppose the Proposed Data Center Near Naper Commons

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Hi Mary,

Thank you for your response. I understand this project is still in the early stages of planning, and I've also been keeping informed through others who've shared that these database centers are intended to handle "low-power" transactions such as airline ticket purchases.

As I will not be able to attend the September 3rd meeting, I would ask the planning commission to reflect on the broader consequences — disruption to the Danada Forest Preserve ecosystem, reduced home values in the area, and long-term environmental damage that cannot be undone.

So the question becomes this for the planning commission: is it truly worth sacrificing our community, our property values, and a protected natural ecosystem, simply so someone hundreds of miles away can complete an airline ticket purchase a few seconds faster? Surely the well-being of our community and environment deserves more weight than that. Thank you again for your response.

Best regards,

Ryan Olsen

On Fri, Aug 15, 2025 at 12:50 PM Gibson, Mary <GibsonM@naperville.il.us> wrote:

Hi Ryan,

Thank you for reaching out and sharing your concerns regarding the proposed data center project. I want to assure you that this project is still in the very early stages. Before anything can move forward, it must go through our Planning and Zoning Commission and then to the City Council, where it would be considered as a conditional use for the site.

These hearings are designed specifically so that important questions, like the ones you raised, can be asked, details can be clarified, and concerns from residents like yourself can be addressed. At this point, no approvals have been given, and nothing is final.

As your Councilwoman I would not support approving any project without first ensuring that these issues are thoroughly reviewed and that the community has the opportunity to weigh in.

Thank you again for taking the time to share your perspective. I encourage you to stay engaged as this process moves forward, and I will make sure residents are informed about opportunities to participate in upcoming meetings.

Sincerely,
Mary

Mary Gibson

Naperville City Councilwoman
400 S. Eagle St. Naperville, IL 60540
(630) 305-5333 | GibsonM@naperville.il.us

From: Ryan Olsen <[REDACTED]>
Sent: Wednesday, August 6, 2025 7:35 AM
To: Holzhauser, Ian <Ian.Holzhauser@naperville.il.us>; Longenbaugh, Allison <LongenbaughA@naperville.il.us>; Syed, Ashfaq <SyedA@naperville.il.us>; Wilson, Nate <WilsonN@naperville.il.us>; Gibson, Mary <GibsonM@naperville.il.us>; Kelly, Patrick <KellyP@naperville.il.us>; McBroom, Josh <McBroomJ@naperville.il.us>; White, Benny <WhiteB@naperville.il.us>; Wehrli, Scott <WehrliS@naperville.il.us>; Planning <Planning@naperville.il.us>
Subject: Please Oppose the Proposed Data Center Near Naper Commons

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Dear Mayor Wehrli, Council Members, and Planning & Zoning Commission,

My Name is Ryan Olsen and I am writing as a concerned resident to urge you to **oppose the proposed data center near the Naper Commons development**. While I understand the need for economic development in Naperville, this proposal presents serious concerns that threaten the character, safety, and value of nearby residential communities.

Councilman Ian Holzhauser is right to oppose this project, and I applaud his leadership. I respectfully call on the rest of the Council and the Mayor to reconsider their support for this proposal for the following reasons:

1. Incompatible with Surrounding Residential Areas

The proposed data center site is directly adjacent to multiple established and growing residential neighborhoods, including **Naper Commons**, **Indian Hills**, the **newly developing Northwoods of Naperville**, and areas bordering the **Danada Forest Preserve**. These are high-quality communities with **\$500,000+ homes and townhomes**. Placing a massive industrial facility near these neighborhoods directly undermines the investments homeowners have made in Naperville's west side. Residents in the townhomes closest to Naperville road will be less than a few hundred feet from the site.

2. Guaranteed Loss of Property Value

It is virtually guaranteed that this data center will **devalue nearby properties**. Industrial development of this scale—bringing noise, heat, diesel exhaust, and 24/7 operations—will deter future buyers and erode the equity of existing homeowners. Residents who have invested heavily in these communities now face the unacceptable risk of diminished property values as a direct result of city-sanctioned development.

3. Environmental and Quality-of-Life Concerns

The **Danada Forest Preserve**, a treasured natural space, will also feel the effects of this development. Increased heat, air, and noise pollution from cooling systems and generators will disrupt the ecological balance of the area and impact wildlife and trail use. The quality of life for residents who value outdoor recreation and a peaceful neighborhood environment will be significantly compromised.

4. Limited Community Benefit

Data centers offer **very few permanent jobs** and contribute little to the local economy beyond tax revenue. In contrast, they impose long-term infrastructure demands and create burdens for residents without improving the community's day-to-day life. Simply put, this is a poor tradeoff.

5. Better Locations Are Available

Naperville has designated **industrial corridors** far better suited for this type of development. Choosing to place this facility next to high-value neighborhoods and preserved natural space is short-sighted and sets a **troubling precedent** for future development decisions.

We urge the Council and Mayor to put the well-being of residents first. Naperville's strength has always come from its thriving neighborhoods, green space, and thoughtful planning—not from prioritizing industrial use over community quality of life.

Please stand with the residents of **Naper Commons, Indian Hills**, and future residents of **Northwoods of Naperville**, and all those who care about protecting our investments and environment. Follow Councilman Holzhauser's lead and vote **NO** on this project.

Sincerely,

Ryan Olsen
Naper Commons [REDACTED]

Kopinski, Sara

From: Egner, Therese
Sent: Thursday, August 21, 2025 2:36 PM
To: Kopinski, Sara
Subject: FW: Reject Data Center at Nokia site

Hi Sara, This public comment for DEV-0057-2025 came through POD.

Therese Egner

Assistant Planner | Planning & Development - TED Business Group
City of Naperville | 400 S. Eagle St. Naperville, IL 60540
(630) 420-4179 | egnert@naperville.il.us

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From: Tracey Keane-Schweiner <[REDACTED]>
Sent: Thursday, August 21, 2025 2:22 PM
To: Planning <Planning@naperville.il.us>
Subject: Reject Data Center at Nokia site

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Hello,

Please reject the proposed data centers at the Nokia site. The area is beautiful and frequently used by all neighbors for exercise, social gatherings, wildlife viewing, and mental health exercises.

The data centers are not worth the trade in human health.

Thank you,
Therese Schweiner

[REDACTED]
Warrenville, IL 60555

Kopinski, Sara

From: Egner, Therese
Sent: Thursday, August 21, 2025 2:59 PM
To: Kopinski, Sara
Subject: FW: Opposition to Proposed Data Center Near Our Community

Hi Sara! This public comment for DEV-0057-2025 came through the Planning Inbox.

Therese Egner

Assistant Planner | Planning & Development - TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

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From: Sabanam Lakhey [REDACTED]
Sent: Thursday, August 21, 2025 2:52 PM
To: Planning <Planning@naperville.il.us>
Subject: Opposition to Proposed Data Center Near Our Community

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Dear Naperville Planning and Zoning Committee,

I am writing on behalf of myself and many concerned residents in our neighborhood to express strong opposition to the proposed data center next to our community. While we understand the importance of technology and infrastructure development, the location of this project is highly inappropriate and poses serious risks to our families, our environment, and the surrounding ecosystem.

Key Concerns:

1. Impact on Families and Quality of Life:

The constant noise from industrial cooling systems, generators, and equipment would disrupt the peace of our community.

Increased traffic from heavy construction and maintenance vehicles would create safety hazards for our children and residents.

2. Environmental Consequences:

The proposed site is adjacent to a forest preserve, which is home to many animals and serves as a vital green space for our community. Development threatens habitats and disrupts wildlife.

Data centers consume massive amounts of water for cooling, which could place additional strain on local water resources.

Energy consumption from a large-scale facility would increase carbon emissions, conflicting with community sustainability goals.

3. Property Values and Community Well-being:

The presence of an industrial facility next to residential homes will almost certainly reduce property values.

Residents moved here for a safe, quiet, and environmentally friendly community—this project undermines that promise.

4. Health and Safety Risks:

Backup diesel generators release emissions that can impact air quality.

Increased light pollution and 24/7 operations will disturb both residents and wildlife.

Naperville prides itself on being a family-friendly city with thoughtful urban planning. Approving a data center in such close proximity to homes and a forest preserve would be a step backward and an irreversible mistake. We urge the Planning Committee to reconsider and seek alternative sites more appropriate for heavy infrastructure.

Our community is prepared to actively protest this project and make our voices heard. We strongly request that the committee reject this proposal and preserve the safety, health, and environment of our neighborhood.

Thank you for your time and consideration.

Sincerely,
Sabanam Lakhey

██████████ Naperville, IL 60563

Kopinski, Sara

From: Egner, Therese
Sent: Thursday, August 21, 2025 3:00 PM
To: Kopinski, Sara
Subject: FW: Opposition to Proposed Data Center at Former Lucent Site

Hi, Sara! This public comment came through POD for DEV-0057-2025.

Therese Egner

Assistant Planner | Planning & Development - TED Business Group
City of Naperville | 400 S. Eagle St. Naperville, IL 60540
(630) 420-4179 | egnert@naperville.il.us

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From: P V <[REDACTED]>
Sent: Thursday, August 21, 2025 2:56 PM
To: Planning <Planning@naperville.il.us>
Subject: Opposition to Proposed Data Center at Former Lucent Site

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To Naperville Planning and Zoning Commission Board,

I'm writing not just as a concerned resident, but as someone whose life is deeply rooted in DuPage County. The proposal by Karis Corporation to build a data center on the former Lucent site deeply unsettles me—especially since I received no formal notice, unlike some neighbors who were contacted by attorneys.

I've lived in DuPage County my entire life. I've watched it grow—cornfields becoming industrial parks, and a single hospital building blossoming into a full medical complex. Change is inevitable, but not all change is progress. Some comes at too high a cost.

As a lifelong resident, I've spent countless hours enjoying our forest preserves with family and friends—walking, biking, picnicking, and observing wildlife. Since moving to Naperville, I've continued to cherish the natural beauty of the area. I

regularly see finches, cardinals, blue jays, herons, cranes, and sandhill cranes near the old Lucent/Nokia buildings and even on my street. Turtles cross our roads, deer peek from behind trees, coyotes roam through backyards, and foxes with striking fur appear from a distance. These are not just animals—they are part of a delicate ecosystem that makes our community unique.

A data center here would disrupt everything. These facilities consume enormous amounts of energy and water, emit pollution, generate noise, and flood the area with artificial light. They don't belong next to a forest preserve or in a quiet neighborhood built around nature.

I also live with a serious medical condition that makes me especially vulnerable to environmental stress. My recovery is slow, and clean air and calm surroundings are essential to my health. I've been fortunate to find incredible doctors at Northwestern Memorial who understand my medical needs. I've built a support system here—family, lifelong friends, and new neighbors who've made Naperville feel like home. I went to school here—from grade school through graduate school. I've planted deep roots. I don't want to leave. But if this project moves forward, I may have no choice.

One of the most joyful parts of living near the forest preserve has been rediscovering the insects I loved as a child—grasshoppers, fireflies, and dragonflies. Their return has been a powerful reminder of the importance of preserving natural spaces. These creatures, along with countless others, are indicators of a healthy ecosystem. If we allow industrial development to encroach on this land, we risk losing not only biodiversity but also the emotional and cultural connection we have to nature.

I'm not against development, but it must be responsible. There are better locations for a data center—ones that won't threaten our health, wildlife, or way of life.

Please reconsider. Say no to the data center. Protect our forest preserve, our neighborhood, and the values that brought us here. Once this land is gone, we can't get it back.

Sincerely,

Priya Vincent

Kopinski, Sara

From: Iwicki, Brad
Sent: Friday, August 22, 2025 11:34 AM
To: Kopinski, Sara
Subject: FW: Public Comment on Proposed Data Centers in Naperville

Hi Sara,

The POD received a public comment regarding the data center today around 8:00am.

Thank you,

Brad Iwicki

Assistant Planner | Planning & Development – TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 305-7021 | iwickib@naperville.il.us

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From: [REDACTED]
Sent: Friday, August 22, 2025 8:07 AM
To: Planning <Planning@naperville.il.us>
Subject: Public Comment on Proposed Data Centers in Naperville

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Dear Members of the Planning & Zoning Commission,

My name is Daniel Vojcak, and I am a Naperville resident living near Spring Brook Elementary School. I also grew up here, attending Neuqua Valley High School. I appreciate the opportunity to submit my comments regarding the proposed data centers along the I-88 corridor.

I respectfully urge the commission to carefully weigh whether the long-term impacts these data centers may have on our city's infrastructure, environment, and quality of life are worth the potential economic benefits. I also strongly encourage the commission to require full, transparent, and publicly accessible environmental and utility impact assessments before moving forward with any approvals.

Specifically, I recommend that the commission require:

1. A noise study showing decibel estimates at key nearby residences, along with mitigation plans.
2. A traffic impact assessment, particularly during peak construction periods.
3. Utility interconnection reports outlining grid capacity, projected increases in demand (estimated at 10%+), and clear funding sources for any required upgrades to ensure costs do not fall unfairly on residents.
4. Water usage and watershed protection plans addressing data center water usage and mitigation strategies.

In addition, I believe it is important to clarify who will benefit most from these proposed data centers. Will Naperville and its residents receive a fair share of the revenue, or will the benefits primarily flow to outside developers and interests that do not live near these facilities?

I also encourage the city to request detailed information regarding employment: projected job creation, expected wages, and whether there will be commitments to hiring local workers.

Thank you very much for your time and consideration of these concerns. I care deeply about Naperville's future and urge the commission to ensure that any development proceeds only with full transparency, accountability, and community benefit.

Sincerely,
Daniel Vojcak
Naperville, IL

Kopinski, Sara

From: Iwicki, Brad
Sent: Monday, August 25, 2025 8:43 AM
To: Kopinski, Sara
Subject: FW: New Data Center

POD - Data Center Public Comment

Brad Iwicki

Assistant Planner | Planning & Development – TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 305-7021 | iwickib@naperville.il.us

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From: Mike Nielsen <[REDACTED]>

Sent: Friday, August 22, 2025 7:25 PM

To: Planning <Planning@naperville.il.us>

Subject: New Data Center

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I just read that a huge new data center is being build on Herrick Lake and Danada Forest Preserve property. I am TOTALLY against this, as I use these sacred PROTECTED forest preserve lands for recreation. This will DESTROY this land.

Mike Nielsen
Lisle, Illinois

Kopinski, Sara

From: Iwicki, Brad
Sent: Monday, August 25, 2025 8:43 AM
To: Kopinski, Sara
Subject: FW: Our Forest Preserve

POD - Data Center Public Comment

Brad Iwicki

Assistant Planner | Planning & Development – TED Business Group City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 305-7021 | iwickib@naperville.il.us

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-----Original Message-----

From: Caroline Vaughan [REDACTED]
Sent: Friday, August 22, 2025 8:18 PM
To: Planning <Planning@naperville.il.us>
Subject: Our Forest Preserve

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Please do not take away our nature. These data centers will destroy the wildlife and eco systems surrounding. These center use so much water! They will ruin all the surrounding areas and what's left of the nature will die out. Sweetness known for its beautiful foliage. Let wheaton remain its beautiful self.

Kopinski, Sara

From: Iwicki, Brad
Sent: Monday, August 25, 2025 8:43 AM
To: Kopinski, Sara
Subject: FW: Case #: DEV-0057-2025

POD - Data Center Public Comment

Brad Iwicki

Assistant Planner | Planning & Development – TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 305-7021 | iwickib@naperville.il.us

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From: Samantha Bissell [REDACTED]

Sent: Saturday, August 23, 2025 9:29 AM

To: Planning <Planning@naperville.il.us>

Subject: Case #: DEV-0057-2025

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Hello,

I am a resident of Wheaton, but live not far from the proposed site of this data center. This development project was brought to my attention last night, so I unfortunately missed the August 20 public hearing. However, I would like to express my opposition to this project.

We are seeing across the country the negative environmental impacts these large data centers have on the nearby communities. The massive cooling needs for the data centers results in depletion of water resources for their neighboring communities, in addition to contributing to air pollution. These data centers do not contribute anything to community besides pollution and water scarcity.

Sincerely,

Samantha Bissell

██████████
████████████████████████████████████████

Kopinski, Sara

From: Egner, Therese
Sent: Tuesday, August 26, 2025 9:52 AM
To: Kopinski, Sara
Subject: FW: Data center

Hi Sara, this public comment came in for DEV-0057-2025.

Therese Egner

Assistant Planner | Planning & Development - TED Business Group
City of Naperville | 400 S. Eagle St. Naperville, IL 60540
(630) 420-4179 | egnert@naperville.il.us

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From: Lauren Bezdek <[REDACTED]>
Sent: Monday, August 25, 2025 7:54 PM
To: Planning <Planning@naperville.il.us>
Subject: Data center

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Good evening,

I wish to express my opposition to any development of a data center within Naperville for the reasons outlined below.

A single **data center** can utilize 100,000 homes' worth of energy. This is a massive cost to the environment. With the source of Naperville electricity procured by dirty energy, this is of extreme concern. We are doing everything we can in my household to utilize less energy so we have less of a negative effect on the environment. This would undo our actions and many increasingly concerned Naperville residents' actions who are realizing that future generations will have to live with the pollution we create today.

I also am alarmed at the proposed site. Right next to a forest preserve where I have spent weekends for 20+ years. Neither my family nor the wildlife living there will be able to enjoy a peaceful , clean environment with air and environmental quality ruined by generators , noise and other pollution. Additionally there are also numerous very recent articles pointing to the increase in electricity rates being due to **data centers**, most recently several linked to ComEd. If the proposed **data center** is offering revenue to Naperville, I would strongly disagree with their assertion. Many communities across the US have found their utility bills increase substantially when **data centers** come to town. Residents end up paying the cost for the “privilege” of having a data center in their city. And if they are stating they will bring jobs, there is a very small job benefit- typically between 30 and 50 “permanent” jobs. It is not worth the massive cost to the environment, and residents end up paying for the **center** to be there through their significantly increased electricity bills.

As someone who has lived in Naperville for 40 years- overall, I increasingly feel that Naperville planning and zoning does not listen to or consider the needs of the people who live here, and that is unsatisfactory.

Thank you,
Lauren Bezdek

Karis Critical Naperville Data Center
1960 Lucent Lane, Naperville, IL 60563
08-05-207-037

The infrastructure, utilities, and resources of the City of Naperville, which were created over many decades of thoughtful and prudent expenditure are the principal features that make this project appealing to the petitioner. It is my belief that these resources and assets are not appropriately priced for the disproportionate impact it will have upon the existing users and taxpayers.

- The extremely reliable and affordable **electricity** provided through the City of Naperville's procurement and distribution infrastructure is the predominant advantage of this development. Naperville's favorable electricity service has been achieved through decades of municipal development and funding by residents. This zoning change will make the City of Naperville responsible for continuity of the data center's operation. Furthermore, additional substation facilities will need to be created and maintained for this endeavor.
- Cooling is essential in a data center facility. Data centers utilize many systems to cool computer equipment beyond air conditioners. Dripping **water** over a fanned screen is sometimes referred to as a "swamp cooler". This process, while requiring lower electricity cost, involves higher water usage. The excellent water availability we have in the City of Naperville, through DuPage County's acquisition of Lake Michigan water enables this project. Once again, it is taxpayer funding that has provided this resource that the petitioner will leverage at a discount for its disproportionate consumption.
- Data centers require additional protection from intruders, as evidenced by changes in higher and more substantial fencing. Data centers typically employ private security, but given the sensitivity of private data and the nearby electrical infrastructure, additional **police** services would be utilized around this 24x7 facility.
- Finally, the continuous electricity operation at this facility may make it more prone to a **fire** incident. While data centers utilize sophisticated fire mitigation strategies, including sprinklers and halon gas, the City of Naperville Fire Department would still be contacted. A sizable diesel fuel reservoir would be stored on the facility to operate diesel engine generators for electricity continuity. Diesel engine generation would be an additional fire and hazmat hazard.

Data centers operate with extremely low personnel. Increased **employment is negligible**.

Outputs of this proposal are also unfavorable for the City of Naperville.

- The petitioner has explained that screens would be constructed around their roof mounted cooling facilities. This acknowledges the significant **sound** and **noise vibration** that would be created from this equipment. I worry that the City of Naperville will become embroiled in controversy between nearby residential and commercial residents about how many decibels are considered acceptable.

- In order to cool the extensive amount of technology equipment, we previously explained the expansive water utilization that would occur. Corresponding to this high water usage, the **waste water** would need to be processed through the City of Naperville. It is likely additional municipal investments would need to occur to support this facility. Is there sufficient waste water management processing capacity in the northern section of the City of Naperville?
- Operation of **diesel** powered electricity generators, although for a short period would be an environmental hazard. Additionally, it would cause fumes in the nearby area.

This area is a highly desirable location. It is located amongst other commercial interests with excellent access to road and highway systems. Petitioner states that there is (currently) low demand for commercial office space and that the tax revenue from this utilization is highly desirable to the City of Naperville.

I disagree. I believe there are more advantageous commercial uses of this property buttressed by the enviable stature of Naperville. There are many locations along highway and electricity assessments a data center may choose to build that are less expensive than this property. As stated earlier, it is the excellent infrastructure and services that make this proposal appealing. The City of Naperville and residents are not adequately compensated in this proposal for what it is providing and receiving. I further believe we may be reflexively choosing to accept this proposal in the absence of any other. As the City of Naperville continues to excel and distinguish itself, superior and more compatible options will present themselves.

Kopinski, Sara

From: Iwicki, Brad
Sent: Wednesday, August 27, 2025 4:39 PM
To: Kopinski, Sara
Subject: FW: Opposition to Case DEV-0057-2025 – Data Center Proposal

FYI – Data Center public comment received by the POD

Brad Iwicki

Assistant Planner | Planning & Development – TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 305-7021 | iwickib@naperville.il.us

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From: J Xing <[REDACTED]>
Sent: Wednesday, August 27, 2025 3:32 PM
To: Planning <Planning@naperville.il.us>
Subject: Opposition to Case DEV-0057-2025 – Data Center Proposal

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To the Naperville Planning and Zoning Commission:

Regarding Case DEV-0057-2025 – Public Notice of Application by Karis Critical, LLC, concerning the Nokia property (identified by the parcel numbers listed in the public notice), I am writing to **oppose this proposal strongly**. While presented as economic development, the plan to construct two 211,000-square-foot data centers poses **serious and permanent risks to the health, safety, and quality of life of Naperville residents nearby**. These impacts cannot be fully mitigated once construction begins.

Fuel Storage Risks

The most serious concern is the large-scale storage of fuel required to support backup generators for one to three days of independent operation. This means extraordinary volumes of fuel must be stored in either above-ground or underground tanks. The risks include leaks and spills contaminating soil and groundwater, long-term environmental damage, and the potential for fires or explosions. These hazards are not hypothetical, and once such an incident occurs, the damage cannot be reversed. Placing this danger so close to homes and forest preserves is incompatible with community safety.

Public Safety Concerns

The presence of large fuel reserves and heavy industrial equipment increases the risk to nearby residents and natural areas, and local emergency services may lack the resources to manage incidents of this scale.

Air Quality and Environmental Impacts

Diesel generator emissions from monthly testing and emergency use will worsen air quality and affect residents' health. The facilities will also generate massive heat output, creating a localized "heat island" effect that harms wildlife and diminishes neighborhood livability.

Noise, Light, and Other Impacts

Continuous mechanical noise, vibrations, and bright security lighting will disrupt nearby neighborhoods. Property values will decline, future community investment will be discouraged, and approval would set a dangerous precedent for further industrial encroachment into residential zones.

For these reasons, I respectfully urge the Planning and Zoning Commission to **deny Case DEV-0057-2025 in its entirety.**

Thank you for your consideration.

Sincerely,

Jianqi Xing

██████████ Naperville, IL 60563

Fairmeadow Neighborhood Association

██████████
Naperville, IL 60563

August 27, 2025

Naperville Planning and Zoning Board

Naperville Municipal Center

400 S. Eagle Street

Naperville, IL 60540

Dear Members of the Planning and Zoning Board,

On behalf of the Fairmeadow Neighborhood Association, I am writing to formally express our strong opposition to the proposed development of a data center near our residential community.

While we recognize the importance of technological infrastructure and economic impact of the proposed facilities utility taxes, we believe this particular project poses significant risks and concerns that directly impact the health, safety, and quality of life of our residents. We believe that a data center of this scale is better suited for industrial zoning than ORI (Office, Research AND Light Industry) and further does not belong in close proximity to residential neighborhoods.

Our primary concerns include:

1. **Data Center Scale:** The proposed data center, while not the largest in the Chicago land area, would be in the top 15 based on power use. In reviewing the zoning of a large number of data centers in the area, almost all data centers that have been built in the last 10 years are in industrial zoning areas. There are a number of older data centers that are of much smaller scale having a far smaller square footage, power (<10 MW), cooling, and generator (Less than 6 generators) footprint than the proposed (73 MW) facility that are in light industrial or commercial zoned areas. Smaller scale lower power footprint data centers constructed more than 10 years ago are more appropriate for ORI – Light Industrial zoning the data centers of the proposed scale.
2. **Noise Pollution:** Data centers operate continuously and often rely on large-scale cooling systems and backup generators, which can produce persistent and disruptive noise. This is incompatible with the quiet, residential character of residents living close to the proposed facility. Noise concerns are not limited to backup generators that may only run during power outages and routine testing but also the constant hum of electrical substation and cooling fans. The amount of cooling required has a direct relation to the power consumption of the overall power usage of the facility as energy used by the computers is turned to heat that has to be removed from the facility.

Data Center noise risk is an emerging area of study due to the explosive expansion of the number and scale of data center facilities.

- <https://pmc.ncbi.nlm.nih.gov/articles/PMC12273412/>
- <https://hsph.harvard.edu/news/noise-can-harm-your-health-even-if-you-sleep-through-it/>

In other parts of the country such as in Prince William County, Virginia, the municipalities and residents have been struggling with the noise-related issues for some time. Data centers that were built more than 7-10 years ago did not have the same noise profiles of data centers built today. Data center noise is additive to existing background noise and will increase the overall background noise of the area and the low-frequency noise that is generated has not been well studied and can be heard for miles away from the data center facilities. While there are hundreds of news stories in the last few years about data center noise-related issues in Prince William County, many highlight the need to change zoning and noise ordinances after the fact. When hundreds of millions of dollars and residents' health are on the line a wait and see approach does not work.

- https://www.princewilliamtimes.com/news/coming-crackdown-on-data-center-noise-likely-wont-bring-relief-to-a-community-most-affected/article_5307ae6c-fac1-11ef-89ef-13f721478913.html
- https://www.insidenova.com/headlines/prince-william-outlines-noise-ordinance-update-with-data-centers-a-priority/article_1cd3b2cc-ac4c-425b-8824-7041e40d13a6.html

The noise has been a recent local concern at the CyrusOne data center in Aurora. While the original data center building that has been in operation for many years had not been an issue. The issues started with the 2024 construction of the new building that was built with higher power densities similar to the proposed design and square footage but with a smaller power footprint (53MW vs 73 MW) to the proposed data center. It is important to note this issue is large enough that the data center provider is willing to pay for residents to stay in hotels when the generators are running. The Aurora residents are significantly further away than the townhomes on Weatherbee Lane in the proposed data center.

<https://www.chicagotribune.com/2025/08/21/cyrusone-in-aurora-again-warns-of-upcoming-generator-use-for-repairs-friday/>

<https://www.chicagotribune.com/2025/08/11/residents-near-cyrusone-data-center-in-aurora-concerned-about-noise/>

<https://www.cyrusone.com/data-centers/north-america/aurora-il-back-up-generator-schedule>

- Air Quality and Generator Exhaust:** The use of diesel-powered backup generators raises serious concerns about air pollution, particularly the release of harmful exhaust emissions during testing and operation. This poses a health risk to nearby families, especially children and the elderly. Each building of the proposed facility will have 20 to 24 diesel generators capable of producing 2-3 MW (Megawatts) of power. Individual generators are similar in size to the diesel engines in a train locomotive. There has been a large amount of research on diesel exhaust and the effects on people that has led to regulations from federal and state Environmental Protection Agencies and Occupational Safety and Health Administrations.

On a hot summer evening when the power is out, residents will be unable to open windows due to the deafening noise, vibrations, and large quantity of diesel exhaust from a minimum of half of the locomotive-sized diesel generators (40-48 total) in the facility running. Their homes will be uninhabitable during these inevitable power outage events that may become more frequent with the strain that these facilities put on the power grid.

Due to the size and scale of generator exhaust, this type of facility is more compatible with industrial zoning where generators are located further from residences.

- Diesel Fuel Storage Safety and Environmental Risk:** Storing large quantities of diesel fuel near homes introduces the potential for leaks, spills, fires, and other environmental hazards. The Illinois Environmental Protection Agency currently limits gas stations to 12,000 gallons of fuel onsite. Each generator will consume 130 to 190 gallons of fuel per hour. The fully built-out facility with 40-48 generators will likely see a minimum of 20-24 generators running during an outage with 2680 to 4560 gallons of fuel being consumed per hour with 64,000 to 109,000 gallons of fuel being stored onsite for 24 hours of operation.

Storing a large quantity of fuel has risk for fire and spills, this can increase during refueling, periodic fuel polishing, and fuel tank cleaning operations. The risk of groundwater contamination and soil degradation is unacceptable in a residential setting. Our neighborhood, which is situated 700 feet from the proposed facility, is reliant on individual homeowners' well water and a large diesel leak would be tragic to our neighborhood.

We are unable to find a facility in Naperville that would have similar amounts of fuel stored onsite and may be a unique challenge for fire department personnel in dealing with fire or spill related accidents.

We believe that the fuel storage requirement alone constitutes this to better fit in an industrial facility.

- Battery Fire Risk:** Data centers rely on UPS (Uninterruptible Power Supply) systems that sit in between the computer systems and the utility and generators to provide

continuous power when there are power issues while the generator starts and is able to provide power. The UPS systems have large banks of batteries that are accustomed to handle the full power load for approximately 15 minutes until generator power is able to be used. These UPS systems have strings of many large batteries that have unique ventilation, storage, and risks associated with them. Older data centers would use lead acid type batteries similar to car batteries and had significant maintenance and safety issues as they generate hydrogen and oxygen during charging and discharging and have been long known to be the source of fires. Modern data centers utilize nickel-based batteries or more common lithium-ion batteries. Lithium-ion batteries have become a preferred battery as they have lower maintenance and longer life than other battery types. However, lithium-ion is known to pose fire hazards that are catastrophic and difficult to contain. Large quantities of these batteries possess a large fire risk. The proposed facility will require local firefighters to invest in extra training and equipment in the case of a fire. It is well known that it is a struggle to extinguish electric vehicle fires because the scale of the facility would be hundreds of times the lithium than a single electric vehicle.

- <https://www.hka.com/article/navigating-data-centre-fire-protection-understanding-lithium-ion-li-ion-battery-hazards/>
- <https://www.datacenterdynamics.com/en/news/lithium-ion-fire-causes-emergency-power-shutdown-at-digital-realty-data-center-in-singapore/>
- <https://www.fireengineering.com/fire-safety/diesel-to-lithium-ion-batteries-the-fire-services-challenge-to-keep-up/>
- <https://www.dhs.gov/science-and-technology/news/2024/12/13/fighting-fire-knowledge-lithium-ion-battery-hazards>

6. **Overall Fire Risk:** The combination of high electrical loads, fuel storage, and battery systems significantly increases the risk of fire. This is particularly concerning given the proximity to homes, schools, and parks. While facilities such as this typically have complicated fire suppression systems there are fires at these types of facilities every year. These more modern facilities with higher power densities have higher risk as they are more unproved over time.
- https://response.epa.gov/site/site_profile.aspx?site_id=15259

The combination of large quantities of electricity, large amounts of lithium batteries, and large amounts of diesel fuel present a very unique risk that is not compatible close to residences. We believe that the overall fire risk is great enough for this proposal to be denied.

7. **Negative Impact on Property Values:** The presence of an industrial facility such as a data center in close proximity to residential homes will reduce property values. This undermines the investments made by families who chose Fairmeadow for its peaceful and safe environment. Our impact is far less than the families of Naper Commons, when the Naperville Zoning Board and City Council approved the zoning and allowed the construction of residential housing abutting the ORI district it has a responsibility to not allow a positionally dangerous industrial facility to be placed directly next to residential homes.

In light of these concerns, we respectfully urge the Planning and Zoning Board to reject the proposed data center development. We believe that alternative locations, better suited for industrial infrastructure, should be considered—ones that do not compromise the safety and integrity of established residential neighborhoods.

We appreciate your attention to this matter and your commitment to responsible urban planning. Please feel free to contact me directly should you wish to discuss our concerns further.

Sincerely,
Kendrick Sands
President, Fairmeadow Neighborhood Association

████████████████████████████████████████

████████████████

Kopinski, Sara

From: Egner, Therese
Sent: Thursday, August 28, 2025 3:20 PM
To: Kopinski, Sara
Subject: FW: Data center

Hi, Sara! Please see this public comment for DEV-0057-2025.

Therese Egner
Assistant Planner | Planning & Development - TED Business Group City of Naperville | 400 S. Eagle St. Naperville, IL 60540
(630) 420-4179 | egnert@naperville.il.us

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-----Original Message-----

From: Pam Ebert <[REDACTED]>
Sent: Thursday, August 28, 2025 2:58 PM
To: Planning <Planning@naperville.il.us>
Subject: Data center

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As a resident of Naperville for 30 years we are opposed to the data center. Electricity and water issues and research shows many are so loud they can create health issues for nearby residents. Please reject this proposal.

Fred and Pam Ebert
[REDACTED]
Naperville.
Sent from my iPhone

Kopinski, Sara

From: Egner, Therese
Sent: Thursday, August 28, 2025 3:56 PM
To: Kopinski, Sara
Subject: FW: Submission of written comments for 9/3 hearing regarding proposed Karis data center

FYI- public comment for DEV-0057-2025

Therese Egner

Assistant Planner | Planning & Development - TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 420-4179 | egnert@naperville.il.us

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From: Kitt Wolfenden <[REDACTED]>
Sent: Thursday, August 28, 2025 3:30 PM
To: Planning <Planning@naperville.il.us>
Subject: Submission of written comments for 9/3 hearing regarding proposed Karis data center

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Dear Naperville Planning and Zoning Commission,

I am writing to express my strongest concern about the proposed Karis data center, which would be of little if any economic benefit and incredibly significant environmental harm. PLEASE SAY NO to this horrible proposal.

Specific critical facts for you to consider:

- **Data centers do not deliver on their job creation claims** - per the Wall Street Journal, "The AI Data-Center Boom is a Job-Creation Bust: Data centers have rightly earned a dismal reputation of creating the lowest number of jobs per square foot in their facilities"
- **Data centers can consume MILLIONS of gallons of water each day for their cooling systems**; NE IL has been a mild drought for nearly a decade, and once this data center would drain the local aquifer dry, **it would literally start sucking Lake Michigan dry**, which would be unimaginably horrible
- **Data centers require absolutely massive amounts of electricity, the cost of which is very unfairly passed onto the community** instead of borne solely by the data center owners
- **Data centers' generators are a huge source of greenhouse gas emissions and noise pollution**
- **Data centers create significant electronic waste** by needing constant upgrade and replacement of IT equipment, which is often not disposed of properly because the fines for improper disposal are less than the cost of proper disposal - improper disposal leads to heavy metals leaching into the ground
- **Data center construction significantly increases impervious surfaces which negatively impacts local ecosystems and stormwater runoff**
- **Data centers keep their buildings fully lit which creates light pollution** that harms the natural ecosystems around them

PLEASE say no to this horrible project! The community does not want this, as is evidenced by the thousands of signatures on this petition here: change.org/p/deny-the-proposed-data-centers?recruiter=1168014641

Thank you,
Katherine Wolfenden
Resident of DuPage County, [REDACTED]

--

Kitt Wolfenden
[REDACTED]

From: Iwicki, Brad
Sent: Wednesday, October 15, 2025 1:18 PM
To: Kopinski, Sara
Subject: FW: Comment on DEV-0057-2025

Categories: Blue Category

POD – Data Center Public Comment

Brad Iwicki

Assistant Planner | Planning & Development – TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 305-7021 | iwickib@naperville.il.us

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From: Catherine Lill [REDACTED]
Sent: Wednesday, October 15, 2025 1:09 PM
To: Planning <Planning@naperville.il.us>
Subject: Comment on DEV-0057-2025

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Hello!

I'm a Naperville resident and I just wanted to express my disappointment in this data center proposal and the fact that it hasn't been stopped yet.

There are numerous reasons why this data center should not move forward. I have yet to see a community that has made a deal to build a data center and not regretted it. No amount of money is worth the impacts this will have on our community in the future.

This is Naperville! We can and we must do better!

Let's stop this now before it becomes a bigger problem we do not want data centers built here!

Thanks,

Catherine Lill



From: Iwicki, Brad
Sent: Wednesday, October 15, 2025 9:42 AM
To: Kopinski, Sara
Subject: FW: Data Center

Categories: Blue Category

Hi Sara,

There are a few public comments for the Karis Data Center that came in last night. I flagged them in the POD and will also forward them to you.

Please see the public comment below.

Thank you,

Brad Iwicki

Assistant Planner | Planning & Development – TED Business Group
City of Naperville | 400 S. Eagle St. Naperville, IL 60540
(630) 305-7021 | iwickib@naperville.il.us

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From: Dean Burau <[REDACTED]>
Sent: Tuesday, October 14, 2025 6:07 PM
To: Planning <Planning@naperville.il.us>; Wehrli, Scott <WehrliS@naperville.il.us>; Wilson, Nate <WilsonN@naperville.il.us>; White, Benny <WhiteB@naperville.il.us>; Syed, Ashfaq <SyedA@naperville.il.us>; McBroom, Josh <McBroomJ@naperville.il.us>; Jain, Supna <JainS@naperville.il.us>; Holzhauer, Ian <Ian.Holzhauer@naperville.il.us>; Gibson, Mary <GibsonM@naperville.il.us>; Kelly, Patrick <KellyP@naperville.il.us>
Subject: Data Center

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I'm writing to ask you to cancel the proposed data center near Naperville & Warrenville Roads. I believe the data center will have many negative effects on the area. In the meantime, I'd be interested in reading the reports which have been prepared to show how such a data center would impact the environment as well as its impact on the electrical energy prices and the grid. Could you please provide such reports or provide a link. Also, what increase in electrical rates are you assuming Naperville residents will pay over the next decade as you analyze whether this data center even makes sense? Obviously, the data center will provide a few jobs and some real estate taxes BUT that doesn't mean it makes economic sense for Naperville residents if we end up paying 50% more for electricity (and I'd remind you that Naperville governmental buildings use electricity as well).

Thanks,

Dean

From: Iwicki, Brad
Sent: Wednesday, October 15, 2025 9:43 AM
To: Kopinski, Sara
Subject: FW: Data center

Categories: Blue Category

POD – Data Center Public Comment

Brad Iwicki

Assistant Planner | Planning & Development – TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 305-7021 | iwickib@naperville.il.us

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From: Tamar Friedman <[REDACTED]>
Sent: Tuesday, October 14, 2025 10:53 PM
To: Planning <Planning@naperville.il.us>
Cc: White, Benny <WhiteB@naperville.il.us>; Wilson, Nate <WilsonN@naperville.il.us>; Wehrli, Scott <WehrliS@naperville.il.us>; Syed, Ashfaq <SyedA@naperville.il.us>; Holzhauer, Ian <Ian.Holzhauer@naperville.il.us>; McBroom, Josh <McBroomJ@naperville.il.us>; Jain, Supna <JainS@naperville.il.us>; Gibson, Mary <GibsonM@naperville.il.us>; Kelly, Patrick <KellyP@naperville.il.us>
Subject: Data center

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To the members of the Naperville Planning and Zoning Commission,

As a resident of and homeowner in Naperville, I am writing to strongly encourage you to not allow the proposed data center. I have no idea why you would want something like this in our town. No one I have talked to wants this and I cannot figure out why you would support this proposal. The potential negative impact is way too great. The land is much too close to Herrick Lake and Danada Forest Preserves, the Sensory Garden Playground, and multiple neighborhoods. The noise and environmental pollution it will cause should be cause enough for you to vote no on this.

It is a serious threat to public health and not something we need in our lovely town.

The City of Aurora recently established a moratorium on data centers, at least until it can study and better understand how to protect residents and property. I think it is abhorrent that you would not protect us in the same way.

Please protect the people of Naperville and say no to this proposal.

Sincerely,

Tamar Friedman

A Naperville resident and homeowner

From: Iwicki, Brad
Sent: Wednesday, October 15, 2025 9:43 AM
To: Kopinski, Sara
Subject: FW: Further data center concerns - Naper Commons resident alarmed by CyrusOne Aurora data center

Categories: Blue Category

POD – Data Center Public Comment

Brad Iwicki

Assistant Planner | Planning & Development – TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 305-7021 | iwickib@naperville.il.us

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From: Weronika Malek <[REDACTED]>
Sent: Tuesday, October 14, 2025 11:01 PM
To: Planning <Planning@naperville.il.us>
Subject: Further data center concerns - Naper Commons resident alarmed by CyrusOne Aurora data center

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Dear Naperville Planning and Zoning Commission,

My name is Weronika Malek-Lubawski and I'm a homeowner and resident of 2423 Lucent Ln, Naperville, IL, 60563. I'm writing with some concerns regarding the proposed data center in the neighborhood's direct vicinity (Nokia campus/Warrenville road).

I already wrote to you on August 20, expressing my concerns about the proposed Karis data center. I watched the Karis presentation from the September Planning and Zoning Commission meeting, and I remain worried, skeptical, and unconvinced by their arguments, which did not properly address risks associated with the construction (and the argument that their data center would generate less noise than an office building, because it has less car traffic, honestly felt like a joke. We as residents are worried about the industrial project in our neighborhood, not about cars).

Karis wants to show how their data center would operate if everything goes exactly right, but what if something goes wrong? For example, the CyrusOne data center in Aurora had noisy back-up power and repairs going on for months and making it impossible for residents to sleep in their own homes, before the company and the city even agreed on a timeline to address those concerns: <https://www.chicagotribune.com/2025/10/10/aurora-reaches-agreement-with-cyrusone-to-address-issues-at-data-center/>

I do not think that Naperville should undertake such risks and allow an industrial project to occupy a site that's not intended for such use. It's putting us, residents; and the environment, at a direct risk.

Unfortunately my job schedule does not allow me to attend October 15 meeting about this issue, but I hope you can take my concerns into account.

Sincerely,
Weronika Malek-Lubawski, Ph.D.

From: Iwicki, Brad
Sent: Wednesday, October 15, 2025 9:42 AM
To: Kopinski, Sara
Subject: FW: Karis Data Center

Categories: Blue Category

POD – Data Center Public Comment

Brad Iwicki

Assistant Planner | Planning & Development – TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 305-7021 | iwickib@naperville.il.us

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From: Robin Schmidt [REDACTED]
Sent: Tuesday, October 14, 2025 8:43 PM
To: Wehrli, Scott <WehrliS@naperville.il.us>; Wilson, Nate <WilsonN@naperville.il.us>; White, Benny <WhiteB@naperville.il.us>; Syed, Ashfaq <SyedA@naperville.il.us>; McBroom, Josh <McBroomJ@naperville.il.us>; Jain, Supna <JainS@naperville.il.us>; Holzhauer, Ian <Ian.Holzhauer@naperville.il.us>; Gibson, Mary <GibsonM@naperville.il.us>; Kelly, Patrick <KellyP@naperville.il.us>; Planning <Planning@naperville.il.us>
Cc: Ken Schmidt [REDACTED]
Subject: Karis Data Center

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[Exposing The Dark Side of America's AI Data Center Explosion](#)



Dear Sirs and Madams,

Please take 45 minutes of your valuable time to review this video regarding the impact of data centers located near residential areas. The exponential growth of these centers is perhaps inevitable, but very damaging to the environment and quality of life for those living near them.

See you all at the zoning hearing tomorrow evening. I would like to know why the site looks like it has already been excavated as if the Karis folks thought this would be a slam dunk. I truly hope I am wrong about that assumption.

Sincerely,

Ken and Robin Schmidt

████████████████████
████████████████

From: Iwicki, Brad
Sent: Wednesday, October 15, 2025 3:17 PM
To: Kopinski, Sara
Subject: FW: Proposed Data Center - former Lucent property

Categories: Blue Category

POD – Data Center Public Comment

Brad Iwicki

Assistant Planner | Planning & Development – TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 305-7021 | iwickib@naperville.il.us

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From: Kevin Humbert <[REDACTED]>
Sent: Wednesday, October 15, 2025 2:14 PM
To: Planning <Planning@naperville.il.us>
Subject: Proposed Data Center - former Lucent property

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I am a resident of Naperville. I am not currently opposed to this project and rather would encourage the Planning Committee to seriously investigate and review all aspects of the Karis proposal. I would vote to proceed but with caution.

The reality today is it's quite doubtful that any business is going to propose new office buildings. So what then to use commercial/office/research zoning for? Data centers are in high demand and the city should give serious considerations.

My opinion:

1. This is a good opportunity to test the viability, safety, and feasibility of allowing a data center in the city limits. There are other large parcels (eg the former Amoco/BP property) available that could be used for this, but then maybe not. Let's use Karis as a test project.
2. The proposed project is really a mini version of the typical data center, again I think it would be a good test case.
3. So far it seems the committee is doing a thorough review of all aspects, please continue. Bring in additional expertise as needed.
4. If approved/recommended, place restrictions on any expansion of building 1 and the build out of building 2 until we have gathered enough information from the operation of the first phase.

My concern:

1. Data centers are energy and water usage hogs, no question. Can the city utilities handle phase 1? Hence why I say proceed with phase 1 and give careful review before approving any expansion. Of course having a complete out would be good if the proposed usage far exceeds the vendors proposal.

Thank you for consideration. Let's move forward with reality.

Kevin Humbert

██████████
██████████

From: Egner, Therese
Sent: Wednesday, October 15, 2025 4:54 PM
To: Kopinski, Sara
Subject: FW: Proposed Data Center Assessment

Categories: Blue Category

Hi, Sara! Please see the public comment for DEV-0057-2025.

Therese Egner

Community Planner | Planning & Development - TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 420-4179 | egnert@naperville.il.us

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From: tim ferritto [REDACTED]
Sent: Wednesday, October 15, 2025 3:55 PM
To: Planning <Planning@naperville.il.us>
Subject: Proposed Data Center Assessment

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Naperville Staff has recommended only Phase 1 be voted on, so the focus should be on Phase 1:

Phase 1:

ELECTRICITY DEMAND:

Power Requirement = 36 MW.

Based Load Factor = 70% (The developer provided a range with 70% as the expected outcome). Therefore, annual electricity consumption = 222,752 kWh, ~16% of Naperville's current demand.

ELECTRICITY SOURCE IMPACT ON EMISSION:

Prairie State Energy Campus (PSEC) already runs at a high net capacity factor. Its low operational variable cost combined with market demand already provides the incentive to run at max rates. A data center in Naperville will have little to no impact on PSEC's operations.

IMEA, Naperville's electricity provider, buys supplemental supply from the PJM Wholesale market to meet total the demand of its members in the PJM grid network.

IMEA will need to buy more from the PJM northern Illinois wholesale market to meet incremental demand for this proposed data center.

Emission impact will be based on the PJM northern Illinois wholesale power source profile, NOT on PSEC. Furthermore, the electricity emission profile will be virtually the same for this data center if built anywhere in northern Illinois.

As a reminder, PSEC has a high tech emission control system (clean coal) that drastically reduces emissions (such as SO₂, NO₂, PM, Mercury). It has relative low emissions vs other coal power plants when looked at on MWh basis.

ELECTRICITY COST IMPACT FOR NAPERVILLE RESIDENTS:

There should be little impact on Naperville electricity prices.

As noted above, the electricity needed for this data center will be acquired from the PJM wholesale market.

PJM wholesale market price has been less expensive than IMEA because IMEA is still paying off major bonds (debt) which will be fulfilled 2035.

There is a chance that PJM wholesale market price will move above IMEA's price due to "capacity" charges. However, this will be mitigated by:

>IMEA uses a socialize method to distribute cost and savings to all its members (Naperville demand is about 1/3 of IMEA total demand). So cost impacts are diluted.

>Naperville Utility will be charging 5% tax annually could be directed to rate payers.

>The developer will be responsible for paying for any new or upgrades to Naperville's grid that are required to service the data center.

>Naperville Utility could look at a new rate class for the data centers to assure they cover incremental costs and the full 5% fee goes to the city.

There should be more concern about Naperville electricity due to IL's Climate & Equitable Jobs Act and also if Naperville leaves IMEA in the middle of a power crunch.

DIESEL GENERATORS:

There will be 24, 3 MW generators (72 MW total).

The diesel generator system is double the size needed to meet power required for the data center. This redundancy assures that there will be adequate power during loss of power emergency.

The individual diesel generators will only run if there is a power supply failure which is rare for Naperville and for very short time periods to exercise the generators.

Each generator will be exercised once per month for 30 minutes.

Each generator will only need to run at 50% if all are turned on for an emergency. The diesel generator will be encased in sound reduction shell and walls will surround diesel yard to direct sound up, away from surrounding neighborhoods. The diesel generators will meet Tier 2 of Tier 3 specifications which means lower NOx, HC and PM emissions vs older generators. These diesel generators will use ultra low sulfur diesel (15 ppm sulfur) a huge drop from the 1500 ppm sulfur diesel 30 years ago. The resulting SO2 emissions are very low and one of the reasons why SO2 is no longer a problem (see graph below). The US EPA under various administration have agreed that only Tier 2 are necessary for EMERGENCY backup generators as the impact to environment and humans is low. The IL EPA (IEPA) will probably do their own assessment but in general have agreed with Federal EPA. For the Prime Data Center in Elk Grove, the IEPA required about half the emergency backup generators be fitted with DPF's (Diesel Particulate Filters), nothing major.

ECONOMIC IMPACT:

5% Electricity Premium that goes to City of Naperville = \$995,000
Total Property Tax = \$645,000
Direct Impact on community (per consultant) =\$5,000,000
Indirect Impact on community (per consultant) =\$2,446,000

OTHER REMARKS:

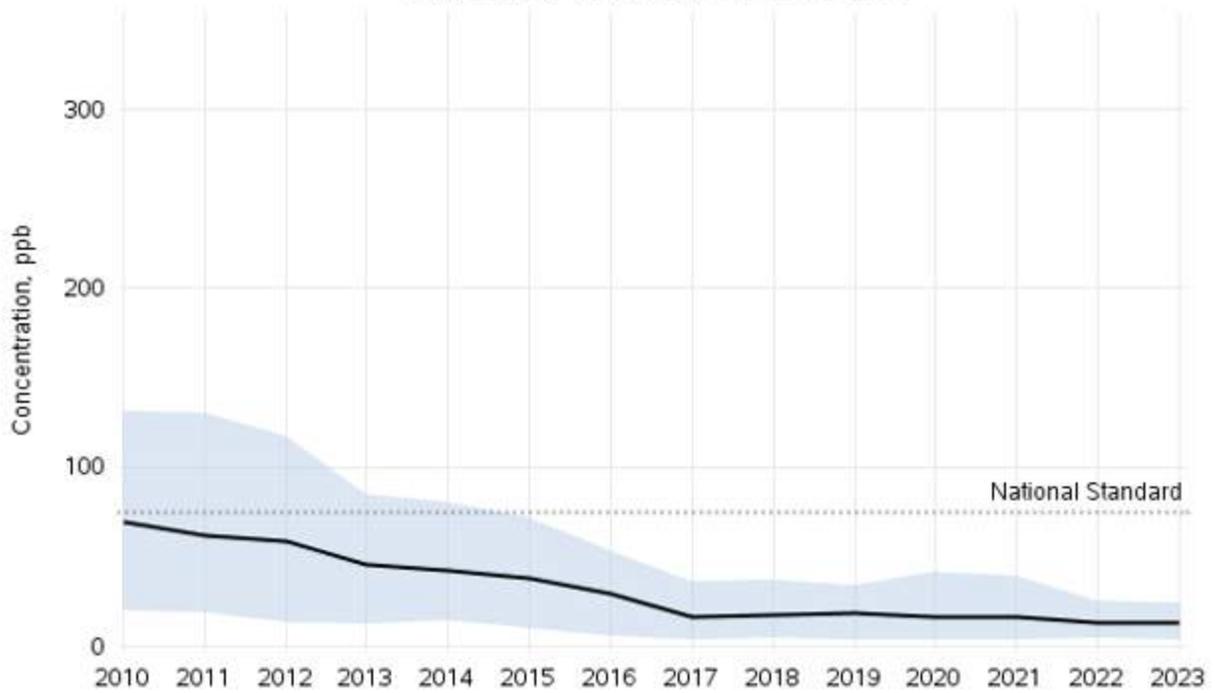
Emission molecules (SOx, NOx, PM's) themselves do not cause harm, it's about dosage or concentration and duration of exposure. Some like to make it sound like emissions have acute and dangerous effect, but they leave out concentration and duration details.

Carbon Dioxide (CO2):

Is a colorless, odorless, non-reactive, non-toxic gas. In high concentrations, it can displace oxygen causing asphyxiation, but no resident around the data center will be exposed to anything close to this level. Is a greenhouse gas but its incremental greenhouse effect is logarithmic (means highly depreciating) with increasing concentration. Furthermore, CO2 is miscible in the atmosphere and climate change theory states that CO2 emission sources are well mixed and therefore do not cause localized issues. In other words, it doesn't matter where the CO2 emission source is at.

Sulfur Dioxide (SO2) is no longer an issue in the US given installation of SO2 scrubbers on coal power plants and dramatic reductions in sulfur specifications fuels since early 1990's, gasoline fuel (500 ppm to 30 ppm) and diesel fuel (~1500 to 15 ppm). The following chart is for EPA's Ohio Valley region which the state of Illinois is in.

SO2 Air Quality, 2010 - 2023
(Annual 99th Percentile of Daily Max 1-Hour Average)
Ohio Valley Trend based on 55 Sites



2010 to 2023 : 81% decrease in average across these sites

Thank you,
Tim Ferritto
Naperville Resident
30 years of direct experience in the Energy industry.

From: Iwicki, Brad
Sent: Wednesday, October 15, 2025 9:43 AM
To: Kopinski, Sara
Subject: FW: Re: Public Notice – Case # DEV-0057-2025; Karis Critical Data Centers
Attachments: [image001.jpg](#); [image002.png](#); [image003.png](#); [image004.png](#); [image005.png](#); [image006.png](#); [2025-10-14 Letter Concerning Data Center.pdf](#)
Categories: Blue Category

POD – Data Center Public Comment

Brad Iwicki

Assistant Planner | Planning & Development – TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 305-7021 | iwickib@naperville.il.us

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From: Mike Benard [REDACTED]
Sent: Tuesday, October 14, 2025 8:53 PM
To: Planning <Planning@naperville.il.us>
Cc: Donna Siciliano [REDACTED]; John Vires [REDACTED]
Subject: Re: Public Notice – Case # DEV-0057-2025; Karis Critical Data Centers

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Please see attached

Michael J. Benard, MPA CPRE | Executive Director



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Kopinski, Sara

From: Iwicki, Brad
Sent: Tuesday, September 23, 2025 3:04 PM
To: Kopinski, Sara
Subject: FW: Opposition to Proposed Data Center Zoning Near I-88 Corridor

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Sara,

Please see the public comment below regarding the data center.

Thank you,

Brad Iwicki

Assistant Planner | Planning & Development – TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 305-7021 | iwickib@naperville.il.us

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From: Suoyang Hou <[REDACTED]>
Sent: Tuesday, September 23, 2025 2:41 PM
To: Planning <Planning@naperville.il.us>
Subject: Re: Opposition to Proposed Data Center Zoning Near I-88 Corridor

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Dear Commissioners,

I am writing as a resident of Naperville (Will County) to respectfully urge you **not to approve zoning rights for the proposed data center near our neighborhood.**

While I understand the city's interest in economic development, I am deeply concerned that a data center at this location would negatively impact the health, safety, and quality of life of nearby residents. Specifically:

- **Noise and Light Pollution:** Data centers operate 24/7 with constant cooling systems, backup generators, and lighting, which could significantly disrupt the peace of nearby residential areas.
- **Environmental Impact:** The energy consumption of data centers is extremely high. This facility would increase demand on our power grid and potentially conflict with Naperville's environmental sustainability goals.
- **Property Values:** Proximity to a large industrial facility can lower residential property values, discouraging families from moving into the community.
- **Traffic and Infrastructure Strain:** Construction and maintenance traffic would add congestion and wear to roads not designed for industrial use.

Naperville is known for its excellent schools, strong neighborhoods, and thoughtful city planning. Placing a high-intensity industrial facility like a data center so close to homes is not consistent with the values and long-term vision that make our city such a desirable place to live.

I urge the Commission to prioritize residents' wellbeing and preserve the character of our community by denying the zoning request.

Thank you for your time and consideration.

- Suo

From: speakersignup@naperville.il.us <speakersignup@naperville.il.us>
Sent: Wednesday, October 8, 2025 11:04 AM
To: Speaker Sign Up <speakersignup@naperville.il.us>
Subject: B/C Comment Form

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Name	Lauren Winters
City/State	Cary, IL
Group/Organization	
Board/Commission	Public Utilities Advisory Board
Meeting Date	10/15/2025
Participation Type	Comment Only
Comment Only - Agenda Item	Proposed Data Center
Comment Only - Comment	<p>I strongly oppose the proposed data center campus at 1960 Lucent Lane for the following reasons:</p> <p>Utility & Grid Risk: The city’s utility noted the project could create immediate load growth far above normal projections; the application references tens of megawatts today with capacity to grow. This risks costly grid upgrades and potential service impacts to residents.</p> <p>Environmental & Water Concerns: The campus is described as having up to ~72 MW capacity; even with developer claims of relatively low daily water use, cumulative cooling impacts, heat-island effects, and lost permeable greenspace are real and understudied. Require an independent hydrology and microclimate study.</p> <p>Health, Noise & Light: Homes and townhomes are adjacent to the site. Require an independent public health impact assessment and enforceable limits on generator testing, noise, and nighttime lighting.</p> <p>Economic Tradeoffs & Transparency: The project projects only ~70 employees in Phase 1 and removes land previously discussed for housing/community use. The city must publish all developer/tenant</p>

	<p>agreements and require binding community benefits and decommissioning bonds.</p> <p>Requested actions: deny conditional use until independent studies are complete and published; require the developer to post bonds covering grid, road, stormwater, and decommissioning costs; and require a legally binding Community Benefits Agreement. Thank you for considering my comments.</p>
Support/Oppose	
Support/Oppose - Agenda Item	

Name: **Lauren Winters**

Email [REDACTED]

Phone [REDACTED]

Acknowledgement: **Acknowledge Yes**

Kopinski, Sara

From: Iwicki, Brad
Sent: Wednesday, October 8, 2025 11:23 AM
To: Kopinski, Sara
Subject: FW: October 15th - KARIS CRITICAL DATA CENTER (DEV-0057-2025) Comment

FYI – Data Center public comment

Brad Iwicki

Assistant Planner | Planning & Development – TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 305-7021 | iwickib@naperville.il.us

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From: Patrick Fanella [REDACTED]
Sent: Wednesday, October 8, 2025 9:20 AM
To: Planning <Planning@naperville.il.us>
Subject: October 15th - KARIS CRITICAL DATA CENTER (DEV-0057-2025) Comment

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My name is Patrick Fanella, I am proud to live and work in the Naperville area. I strongly oppose the proposed data center campus at **1960 Lucent Lane** for the following reasons:

1. **Utility & Grid Risk:** The city's utility noted the project could create immediate load growth far above normal projections; the application references tens of megawatts today with capacity to grow. This risks costly grid upgrades and potential service impacts to residents.

2. **Environmental & Water Concerns:** The campus is described as having up to ~72 MW capacity; even with developer claims of relatively low daily water use, cumulative cooling impacts, heat-island effects, and lost permeable greenspace are real and understudied. Require an independent hydrology and microclimate study.
3. **Health, Noise & Light:** Homes and town homes are adjacent to the site. Require an independent public health impact assessment and enforceable limits on generator testing, noise, and nighttime lighting.
4. **Economic Tradeoffs & Transparency:** The project projects only ~70 employees in Phase 1 and removes land previously discussed for housing/community use. The city must publish all developer/tenant agreements and require binding community benefits and decommissioning bonds.

Requested actions: deny conditional use until independent studies are complete and published; require the developer to post bonds covering grid, road, stormwater, and decommissioning costs; and require a legally binding Community Benefits Agreement. Thank you for considering my comments. p.s. This is the ONLY proposed data center in the area that is not in an already heavy industrial area.

Sincerely,
Patrick Fanella
Downers Grove, IL


Kopinski, Sara

From: Iwicki, Brad
Sent: Wednesday, October 8, 2025 11:23 AM
To: Kopinski, Sara
Subject: FW: Statement Regarding proposed Karis* Data Center at Nokia Site 1960 Lucent Lane

FYI – Data Center public comment

Brad Iwicki

Assistant Planner | Planning & Development – TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 305-7021 | iwickib@naperville.il.us

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From: Michael Thibodeau [REDACTED]
Sent: Wednesday, October 8, 2025 11:07 AM
To: Planning <Planning@naperville.il.us>
Subject: Re: Statement Regarding proposed Karis* Data Center at Nokia Site 1960 Lucent Lane

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Just wanted to correct the typo I made in the subject line, my statement still stands as is.

On Wed, Oct 8, 2025 at 11:00 AM Michael Thibodeau [REDACTED] wrote:

My name is Michael Thibodeau and I am proud to call the Naperville area my home. I wanted to take a moment to voice my opinion regarding this proposed data center development at the old Nokia site at 1960 Lucent Lane.

A data center has no place being built in that area. It abuts residential communities and beautiful natural areas that would be worse off with this facility's presence. There is nothing "light industry" about a data center of this size, it is something that belongs in an industrial park away from homes and parks where our community members live and enjoy themselves. This development would be detrimental to home values nearby and no studies have been submitted regarding the environmental impact this facility will have on Danada Woods Forest preserve. The residents of Naperville will see energy costs skyrocket as a result of this if it goes forward. I strongly urge the board to reconsider the approval of this development on this site.

Thank you,
Michael Thibodeau
Lisle, Illinois

Kopinski, Sara

From: Iwicki, Brad
Sent: Wednesday, October 8, 2025 11:23 AM
To: Kopinski, Sara
Subject: FW: Public Comment for 10/15: Proposed Data Center Plan

FYI – Data Center public comment

Brad Iwicki

Assistant Planner | Planning & Development – TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 305-7021 | iwickib@naperville.il.us

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From: Lauren Winters <[REDACTED]>
Sent: Wednesday, October 8, 2025 11:06 AM
To: Planning <Planning@naperville.il.us>
Subject: Public Comment for 10/15: Proposed Data Center Plan

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My name is Lauren Winters, and I am proud to live in the greater Chicagoland area. I strongly oppose the proposed data center campus at **1960 Lucent Lane** for the following reasons:

1. **Utility & Grid Risk:** The city's utility noted the project could create immediate load growth far above normal projections; the application references tens of megawatts today with capacity to grow. This risks costly grid upgrades and potential service impacts to residents.

2. **Environmental & Water Concerns:** The campus is described as having up to ~72 MW capacity; even with developer claims of relatively low daily water use, cumulative cooling impacts, heat-island effects, and lost permeable greenspace are real and understudied. Require an independent hydrology and microclimate study.
3. **Health, Noise & Light:** Homes and townhomes are adjacent to the site. Require an independent public health impact assessment and enforceable limits on generator testing, noise, and nighttime lighting.
4. **Economic Tradeoffs & Transparency:** The project projects only ~70 employees in Phase 1 and removes land previously discussed for housing/community use. The city must publish all developer/tenant agreements and require binding community benefits and decommissioning bonds.

Requested actions: deny conditional use until independent studies are complete and published; require the developer to post bonds covering grid, road, stormwater, and decommissioning costs; and require a legally binding Community Benefits Agreement. Thank you for considering my comments.

Sincerely,

Lauren Winters

Cary, IL



Kopinski, Sara

From: Iwicki, Brad
Sent: Wednesday, October 8, 2025 11:24 AM
To: Kopinski, Sara
Subject: FW: Comment On Proposed Data Center

FYI – Data Center public comment

Brad Iwicki

Assistant Planner | Planning & Development – TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 305-7021 | iwickib@naperville.il.us

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From: Ryan Neil <[REDACTED]>
Sent: Wednesday, October 8, 2025 11:17 AM
To: Planning <Planning@naperville.il.us>
Subject: Comment On Proposed Data Center

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To Whom It May Concern,

I understand today is the last day to submit comments regarding the proposed data center in Naperville. Like many Naperville residents, I am strongly opposed to this data center due to the potential implications it has on the city's electricity and water usage, and the costs of that increased usage being passed on to residents in the form of higher power bills, increased taxes, and the negative impact on property values related to the many issues that this data center would bring. The negative impacts of this

data center would far outweigh any positives, and I fear that the residents of Naperville will be the ones to bear the cost without any of the benefit.

Thank you for your time.

—

Ryan Neil

Sent from my iPhone

Kopinski, Sara

From: Iwicki, Brad
Sent: Monday, October 13, 2025 9:21 AM
To: Kopinski, Sara
Subject: FW: Lucent Lane Data Center

Data Center Public Comment

Brad Iwicki

Assistant Planner | Planning & Development – TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 305-7021 | iwickib@naperville.il.us

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From: Patrice Basso [REDACTED]
Sent: Sunday, October 12, 2025 12:08 PM
To: Planning <Planning@naperville.il.us>
Subject: Lucent Lane Data Center

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To Commissioners:

I am writing to express my concerns about the proposed data center planned for the Nokia property.

My main issue is the enormous amount of electrical energy that these centers require. Naperville is in the midst of negotiating a new contract for electricity with

IMEA. So the future source of electricity for residents and established businesses is unknown at this time.

Since Naperville has its own electrical department, which would have to absorb possible grid improvement, I believe approving a data center would be imprudent. I also think this location is too close to residential areas.

Sincerely,
Patrice Basso
Naperville,IL

Kopinski, Sara

From: Iwicki, Brad
Sent: Monday, October 13, 2025 9:22 AM
To: Kopinski, Sara
Subject: FW: DEV-0057-2025 – Public Hearing for 1960 Lucent Lane (Karis Critical Data Centers) – PZC File 25-1103C

Data Center Public Comment

Brad Iwicki

Assistant Planner | Planning & Development – TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 305-7021 | iwickib@naperville.il.us

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From: Dan Johnson <[REDACTED]>
Sent: Sunday, October 12, 2025 9:50 AM
To: Planning <Planning@naperville.il.us>
Subject: DEV-0057-2025 – Public Hearing for 1960 Lucent Lane (Karis Critical Data Centers) – PZC File 25-1103C

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Good Afternoon,

My name is Dan Johnson and my address is [REDACTED] in Naperville. My family and I live in Naper Commons and have a direct line of sight on the proposed development (1960 Lucent Lane (Karis Critical Data Centers)) from our backyard.

My parents moved from Chicago to Naperville in the late 1970's to raise a family, and that is where they still are today. I am now doing the same. I've been extremely lucky to have been raised in this community which has been guided by the PZC and City Council decisions, and I wish the same for my daughter. I have memories of the opposition to the construction of the Barnes and Noble bookstore in downtown Naperville in the late 1990's since it could put Anderson's Bookstore out of business. The City had the wisdom and the courage to allow the development to proceed, and I feel that the outcome was great. Much more recently I have memories of the opposition to the rezoning of a portion of the Nokia property from ORI to Residential R2. Once again, the City had the wisdom and the courage to allow the development to proceed, and (as a current resident) I feel the outcome was great.

And that brings us to this development. Although I wholeheartedly credit the City for continuing to support growth, the City is also entrusted with an obligation to insulate its residents from the community divestment that can result from developments such as this. Maintaining this balance, which should be guided by principles of community enrichment, is what continues to make Naperville a nationally recognized community. Once again, I think we are at a point for the PZC and City Council to have the wisdom and the courage to guide the City toward a better future, although this time the responsibility will be to change course.

To go through the timeline of events from my perspective:

- A portion of the Nokia property was subdivided and re-zoned from ORI to Residential R2 in February 2020
- The PUD for Naper Commons was preliminarily approved in April 2021, and received final approval in July 2021
- City Council approved the Land Use Master Plan in March 2022 which shows the remaining portion of the Nokia property to be Medium Density Residential in their Future Land Use plan (Page 37)

These outward signals from the City make it appear that there is a clear plan (and tangible progress in the case of Naper Commons) to transform the Nokia property as a whole from ORI to Residential.

Based on these signals, and our personal observation that the remaining Nokia building appears to be near the end of its service life, we purchased our dream home in September 2022 with the intention of raising our family and retiring on the same property like my parents did. Our hope is that we could trust the signals that the City showed its residents that the remaining Nokia property would generally become residential as property opened up.

The petitioner's development would not only go directly against the City's stated vision for that particular lot (as stated in the Land Use Master Plan), but it would also most likely preclude the City's stated vision for the adjacent lot. Basically, once a data center is constructed, it will be very unlikely that homes will be constructed where the current Nokia building is.

The petitioner has spent a lot of effort convincing the Commission that the noise isn't a big deal. Their argument seems to rely on the fact that the "background noise" from Warrenville Road, Naperville Road, and I-88 is already at a high level. To me, this argument fails prima facie; the correct response should be to reduce the noise, not add more. Instead of relying on high background noise to justify building something loud, the City (via a future developer) could construct walls to mitigate the noise to future residences. This has been implemented along Washington Street to protect the Maplebrook neighborhood, and along 75th Street to protect the Heatherfield neighborhood, to name a few.

I'm not going to present any moral issues regarding energy use, water consumption, etc... and do think that data centers can serve a purpose for the City. There are several unoccupied ORI properties along the I-88/Warrenville Road corridor that would be a better fit. Exactly one mile west of this location sits the vacant BP/Ineos facility. If this development were proposed for that location, I think the public pushback would be focused on moral issues, not acute harm to residents, which may be easier to address.

The petitioner also represents the tax revenue of the development to the City, with a focus on District 203 schools. It's an interesting quirk of the Naper Commons subdivision that the majority attend District 200 schools despite being a part of the City of Naperville. The effect is that the harm to the Naper Commons residents won't be offset by increased school funding. In actuality, the Naper Commons residents will absorb the negative effects of the development, while subsidizing the benefit to the District 203 schools.

Bottom line, I don't think the City representatives should allow a data center to be constructed against the will of the majority of the adjacent residents, go against the publicly stated Land Use Master Plan, and preclude the realization of the Land Use Master Plan on an adjacent lot, when an open ORI facility is located one mile away, and without providing a benefit to the adjacent residents.

I hope the Council can see the wisdom and find the courage to make the right decision. Or at the very least construct something on this lot which wouldn't prevent the adjacent Nokia building property from re-zoning as Residential.

Thank you for your service to the City and for your time to consider this perspective. I hope you will vote No to the Conditional Use for a Data Center on this property.

Thank You,

Dan and Laurie Johnson

We save land.



We save rivers.

Chair

Christopher Burke, PhD

October 13, 2025

Vice Chair

Tom Bennington

Whitney B Robbins, Chair
Naperville Planning and Zoning Commission
City of Naperville
400 S Eagle Street
Naperville, IL 60540

Treasurer

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David Hulseberg
Robert Hutchinson
Patty King
Julie Long
Tony Martinez
Joe Mikan
Curt Pascoe
Jeanette Press
Ellen Von Ohlen
Daniel Wagner

Re: Public Notice – Case # DEV-005702025; Karis Critical Member, LLC

Dear Chairperson Robbins,

The Conservation Foundation would like to make a few recommendations for your consideration to the Karis Data Center proposed near the Danada Forest Preserve. First, we would like to thank you for your community service. We have long enjoyed a warm relationship with the City of Naperville and we are proud to call the McDonald Farm our home. We value our reputation as a non-partisan “reasoned voice for conservation.”

We are writing to ask that you **require the developer to incorporate industry sustainability practices so that this project can become a local model for data center development and attract high quality tenants.** Specifically:

- We appreciate the noted preservation of existing trees and prairie vegetation and the additional shade trees as well as rain garden noted in the proposal. We hope that you will require all of the usual stormwater best management practices to ensure stormwater runoff is properly managed and water quality improved. We ask that you **require ongoing environmental stewardship and invasive species management as part of their maintenance** so they do not degrade into fields of invasive species that harm nearby natural areas.
- The large number of diesel backup generators proposed and their required routine testing and onsite fuel storage is a concern for our community’s air quality and quality of life, especially nearby residents. While they would not eliminate the full need for backup generation, **a roof of solar panels and adequate building-scale battery storage** should be incorporated to minimize the number of generators and their associated local environmental footprint. Naperville-based Advanced Data Technologies recently installed a large roof-top PV array and a large battery for storage.
- Although not within your committee’s scope, the large amount of energy required to operate a facility of this type should be considered by City Council as they negotiate our municipal energy contract with IMEA. We suggest the **developer incorporate energy efficient design elements to reduce electrical and water consumption.** Most of the large data center builders and operators consider the carbon content of the local energy when making location decisions. Given that Naperville currently runs largely on coal-powered energy, it would seem to be a potential negative element for potential future tenants of these data centers which is all the more reason that Karis should want to offset this issue by making their data center as energy efficient as possible. Many

President/CEO

Brook McDonald

Our Mission

We improve the health of our communities by preserving and restoring natural areas and open space, protecting rivers and watersheds, and promoting stewardship of our environment.

We Believe

Every person, regardless of where they live or their social-economic status, deserves clean water, clean air, healthy food, and safe access to nature as a way to be healthy and happy.



corporations in America have publicly stated goals for reducing their carbon footprint and thus consider the energy efficiency of buildings that they build or lease. There is a myriad of design elements that can lead to reduced energy and water consumption that don't have a significant impact on development cost. We suggest that Karis consider attempting to achieve certain goals or outcomes like LEED certification and a target Power Usage Effectiveness (PUE) and Water Usage Effectiveness (WUE) below industry average.

Just by way of background, many of the big data center operators have aggressive goals to improve their environmental performance. Part of this has to do with their desire to be good corporate citizens, but part of it is related to the fact that their customers, the people who use their cloud services or use space in their data centers, care about the environmental performance. Similarly, potential tenants in the Karis data centers may have similar goals. Industry examples include:

- Amazon - goal of net zero carbon emissions by 2040. In 2024 they matched all electricity used across their global operations with 100% renewable energy.
- Microsoft - carbon negative by 2030. Also, by 2030 replenish more water than they consume.
- Google - 24/7 carbon free energy by 2030. Replenish 120% of fresh water used.

Incorporating sustainability goals will go a long way to improving the quality of life for our communities as well as be an attractive selling point for potential tenants. **We are aware of 180-day moratorium our neighboring City of Aurora has implemented, and a pause of this kind would allow time to investigate the feasibility of these and other sustainability features into this project.**

We believe that every person, regardless of where they live or their socio-economic status, deserves clean water, clean air, nutritious food, and safe access to nature as a way to be healthy and happy. We are not anti-development, but rather pro-sustainable development, and we would be happy to participate in any discussions relative to improving this proposal.

Thank you for considering our suggestions.

Sincerely,



Brook McDonald
President & CEO

Kopinski, Sara

From: Iwicki, Brad
Sent: Tuesday, October 14, 2025 1:37 PM
To: Kopinski, Sara
Subject: FW: Data Centers (Oct 15, 2025 Meeting)

POD – Data Center Public Comment

Brad Iwicki

Assistant Planner | Planning & Development – TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 305-7021 | iwickib@naperville.il.us

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From: Grant Levitan <[REDACTED]>
Sent: Tuesday, October 14, 2025 12:11 PM
To: Planning <Planning@naperville.il.us>
Subject: Data Centers (Oct 15, 2025 Meeting)

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My name is Grant Levitan. My wife and I are 41 year residence of Naperville. We don't live near the proposed site for the proposed data center, 1960 Lucent Dr, but we have concerns regarding its proximity to at least three residential neighborhoods.

We have no objection to bringing a data center to Naperville, but feel that it should be located in an Industrial Park. Not sure we have one that would be suitable, but if we did, that would be the place to put it. After all, if you do a little research on the subject, you will find that almost all of the new data centers in the country are in industrial sites that are well removed from people's homes and children's playgrounds

as well as forest preserves. This site is proximate to all three of those. You may ask why that is a problem. It has to do with the pollution generated from the diesel generators required to run a data center 24/7. We are talking about both air pollution and noise pollution. Also the fans required to keep the data centers cool run 24 seven and create a constant noise not unlike that of heavy traffic driving by your home. I would ask whether we want that kind of noise when we are trying to find tranquility in Danada or Herrick Forest preserves.

The diesel generators would require regular refueling by semi trailer trucks and run the risk of leaking fuel into the water table, which is an issue, of course for the residents and also for the wildlife at Danada and Herrick Forest Preserves.

Lastly, the amount of energy used by data centers is significant and would probably exceed that of any other building in Naperville, by a large margin. If we get a data center, properly placed in an Industrial Park, it would be good for them to generate clean energy via solar, wind, or other means rather than relying on Diesel and bringing more pollution into our environment.

Thank you for your consideration~
Grant and Kathleen Levitan



Kopinski, Sara

From: Iwicki, Brad
Sent: Tuesday, October 14, 2025 3:33 PM
To: Kopinski, Sara
Subject: FW: REJECT Data Center Proposal DEV-0057-2025

POD – Data Center Public Comment

Brad Iwicki

Assistant Planner | Planning & Development – TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 305-7021 | iwickib@naperville.il.us

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From: Jen Banowetz <[REDACTED]>
Sent: Tuesday, October 14, 2025 3:29 PM
To: Planning <Planning@naperville.il.us>
Subject: REJECT Data Center Proposal DEV-0057-2025

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Dear PZC Board Members,

I am writing to you again, as stewards of Naperville, to vote against the proposed the 34-megawatt data center on the old Nokia property. This unique parcel is very close to Herrick Lake and Danada Forest Preserves, the Sensory Garden Playground, and multiple neighborhoods (some of them brand-new, approved by this very board). In fact, this area has been evolving toward residential, with a clear precedent set in 2020 toward homes. A data center here clearly does not align with Naperville's longterm development plan.

Nearly all data centers in the Chicago area are zoned as INDUSTRIAL. This property is not.

This project will negatively impact this entire area. This is not speculation. A data center like this will require approximately 48 diesel engines that must run on a schedule (serious noise and carcinogenic air pollution) as well as need massive onsite diesel storage, which is the equivalent of 10 gas stations onsite (100K-plus gallons), meaning severe water/land pollution and fire risk. **It'll be like putting a loud and dangerous train yard in the heart of Naperville and Warrenville Roads.**

It is a serious threat to public health. A serious threat to home and business ownership. A serious threat to public lands.

As you know, the City of Aurora recently established a **moratorium on data centers**, at least until it can study and better understand how to protect residents and property. As a forward-thinking city, Naperville should be as protective of its citizens and their property and do the same. **Why the rush into a poorly regulated industry?** The repercussions of doing so will last for decades.

Data centers also are prone to lawsuits. With potentially massive short-term and long-term damages to consider.

For those touting economic benefits/growth from this project, the payout would be a surprisingly paltry \$1.3 million in taxes for Naperville and maybe 60 jobs. **Somehow the math is not adding up how this would truly benefit Naperville.** In fact, the data center's drain (the equivalent of 27K homes) on the already challenged grid is risky; electricity costs will go up significantly for residents and local businesses. (Not to mention Naperville does not use clean energy; it relies on coal-fired plants, already a huge problem.)

If there's an upside here, I'm not seeing it.

The approval of this data center proposal will set a very dangerous precedent for Naperville.

Thank you for your stewardship.

Best,
Jen Banowetz
Resident (24 years) of Fairmeadow Neighborhood

Kopinski, Sara

From: Laff, Allison
Sent: Tuesday, November 4, 2025 7:21 PM
To: Kopinski, Sara
Subject: FW: Citizen Question Submissions for Mayor/Council (GovQA Reference # W300724-110325)

Another one to add to public comment. Thanks!

From: Pruneda, Rachel <PrunedaR@naperville.il.us>
Sent: Monday, November 3, 2025 2:04 PM
To: Laff, Allison <LaffA@naperville.il.us>; Groth, Brian <GrothB@naperville.il.us>; Louden, Jennifer <LoudenJ@naperville.il.us>
Subject: FW: Citizen Question Submissions for Mayor/Council (GovQA Reference # W300724-110325)

Informational only. I'll respond and close this out.

From: City of Naperville Citizen Support <napervilleil@mycusthelp.net>
Sent: Monday, November 3, 2025 7:50 AM
To: Pruneda, Rachel <PrunedaR@naperville.il.us>
Subject: Citizen Question Submissions for Mayor/Council (GovQA Reference # W300724-110325)

Citizen Support Center (GovQA) Mayor/Council Submission

You are receiving this email to alert you that a new Mayor/Council submission has been created and assigned to you.

Contact Name: Dr Agim Jusufi MD, MPH

Customer Name:

Email: agim.jusufi@Endeavorhealth.org

Phone: [Phone]

Reference Number: W300724-110325

Create Date: 11/3/2025 7:49:11 AM

Status: New Request

Request Type: Question/Concern

Dr Agim Jusufi MD, MPH
2504 Weatherbee lane
Naperville, IL 60563
(331) 200-0437
Agim.jusufi@endeavorhealth.org

Description:

Dear Mayor Wehrli and Members of the City Council,

I am writing as a physician (MD, MPH) and concerned resident of Naperville to express grave concerns about the proposed data center development at Naper Commons. As a public health professional, I have reviewed similar projects in Aurora, IL, and Virginia, where residents report significant adverse impacts—issues we risk importing into our community.

Key Public Health and Community Risks:

1. Diesel Generator Exhaust (Group 1 Carcinogen) The plan includes 24 backup diesel generators requiring monthly testing. Per the World Health Organization and International Agency for Research on Cancer (IARC), diesel exhaust is classified as a Group 1 carcinogen—the same category as tobacco smoke and asbestos. Prolonged exposure increases risks of lung cancer, asthma, and cardiovascular disease, especially in children and vulnerable populations.
2. Noise Pollution and Quality of Life Monthly multi-day generator testing will generate sustained industrial noise, disrupting sleep, concentration, and the peaceful enjoyment of Naper Commons Park and nearby homes. Chronic noise exposure is linked to hypertension, anxiety, and diminished cognitive development in children.
3. Energy Grid Strain and Property Values High-energy-demand facilities like this strain local infrastructure and may lead to unreliable power or higher utility costs. Adjacent industrial zoning could depress residential property values, limiting homeowners' ability to recoup investments.
4. Lack of School District Benefit The development reportedly generates tax revenue without supporting Naperville schools—an inequitable burden on families who rely on strong local education funding.

Request for Action:

I urge the Council to:

- Pause approval pending an independent Health Impact Assessment (HIA) and noise modeling study.
- Require zero-emission backup power (e.g., battery storage or fuel cells) if the project proceeds.
- Mandate real-time air quality monitoring and public reporting near residential areas.
- Engage affected homeowners in meaningful dialogue before final decisions.

Our children's health, our park's tranquility, and our neighborhood's future are not worth gambling on.

I am available to discuss these concerns or provide peer-reviewed studies at your convenience.

Thank you for your leadership and commitment to Naperville's families.

Sincerely,

Agim Jusufi, MD, MPH Physician & Public Health Advocate Naperville Resident

Click the link below to review and/or respond to the submission.

<https://napervilleil.mycusthelpadmin.com/WEBAPP/zAdmin/ServiceRequests/Details.aspx?id=300724>

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Kopinski, Sara

From: Iwicki, Brad
Sent: Wednesday, November 5, 2025 11:00 AM
To: Kopinski, Sara
Subject: FW: Data Centers in Suburbs

Follow Up Flag: Follow up
Flag Status: Flagged

POD - Data Center public comment

Brad Iwicki
Assistant Planner | Planning & Development – TED Business Group City of Naperville | 400 S. Eagle St. Naperville, IL 60540
(630) 305-7021 | iwickib@naperville.il.us

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-----Original Message-----

From: kimberleywuensch@gmail.com <kimberleywuensch@gmail.com>
Sent: Wednesday, November 5, 2025 10:56 AM
To: Planning <Planning@naperville.il.us>
Subject: Data Centers in Suburbs

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I rarely feel the need to speak out because Naperville officials overall do a great job of managing the City, but here we are - a suburban City strongly considering a Data Center.

Yes, the developers state that there won't be the same electric and water issues that cities with Data Centers complain about - higher utility prices borne by the residents; and equally troubling, electrical brown-outs. Brown outs can be dangerous at worst and shorten the lives of electronics at best.

If Naperville officials truly believe the claims of the data center developer, that those issues won't happen at "this" Data Center, and goes through with the plan, then all revenue generated by this Data Center property should not go into a general fund, but instead should be directly and fully credited to every Naperville Resident's City utility bill. This is fair as it will off-set any future increased utility costs and electronic replacement costs caused by the very nature of the Data Center.

Hopefully the City will ultimately agree that Data Centers do not belong in the Suburbs. But if they do allow it then at least the residents receive restitution.

Best Regards,
Kimberley Wuensch, Naperville Resident.

Kopinski, Sara

From: Egner, Therese
Sent: Thursday, November 6, 2025 8:34 AM
To: Kopinski, Sara
Subject: FW: 1960 Lucent Lane DEV-0057-2025

FYI- DEV-0057-2025

Therese Egner

Community Planner | Planning & Development - TED Business Group
City of Naperville | 400 S. Eagle St. Naperville, IL 60540
(630) 420-4179 | egnert@naperville.il.us

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From: Kally McConnell <kally.loomis@gmail.com>
Sent: Wednesday, November 5, 2025 6:38 PM
To: Planning <Planning@naperville.il.us>
Subject: 1960 Lucent Lane DEV-0057-2025

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Hello!

I can not make it to the meeting tonight to speak as I had hoped. Here are my prepared remarks:

My name is Kally McConnell. I am from the Park Addition of Naperville. I am concerned that we don't have enough of an enforceable guarantee to protect both the neighborhood and the nature preserves nearby from the environmental strain that can come from a project like this.

While I understand that promises have been made by Karis, my husband is in technology and has worked on projects such as these. They optimize to get projects like this done quickly so that they can start making money as soon as possible. They aren't optimizing for the health of the building's neighbors.

I don't feel confident in or understand how the promises made will be actually enforced.

I do understand that it is the role of government to protect the citizens from corporate interests. Corporations want to maximize profit. The data center business is booming and by the nature of capitalism, they are going to try to build these as quickly as possible without the future of the people who live nearby in mind; profits will be in mind.

I ask that Naperville, all of you, take care with this decision, set a precedent, and require that if we are building data centers in our town, that our residents and our forest preserves be protected with clean energy or something else that people smarter than me can come up with.

You, our government, are the only thing protecting our community from the potential negative outcomes of this decision.

Thank you so much for your time!

Kally McConnell
636 N Wright Street

--

Kally McConnell
She/her

Kopinski, Sara

From: Egner, Therese
Sent: Thursday, November 6, 2025 8:33 AM
To: Kopinski, Sara
Subject: FW: Public hearing for DEV-0057-2025 Karis Critical Member, LLC

FYI- DEV-0057-2025

Therese Egner
Community Planner | Planning & Development - TED Business Group City of Naperville | 400 S. Eagle St. Naperville, IL 60540
(630) 420-4179 | egnert@naperville.il.us

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-----Original Message-----

From: Richard Stahler <rstahler@sbcglobal.net>
Sent: Wednesday, November 5, 2025 4:48 PM
To: Planning <Planning@naperville.il.us>
Subject: Public hearing for DEV-0057-2025 Karis Critical Member, LLC

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Having resided for 65 years next to the Nokia property beginning when it was Mr. Barkei's farm, we were approached by Bell Laboratory's representative to seek our approval of their purchase of the property with the declaration that Bell would not proceed with the purchase if any adjacent homeowner did not approve.

Surely there is still some essence of that same regard for others that outweighs profit and money as the overriding factor in one's actions.

I do not believe that datacenters should be built adjacent to our homes, please vote no.

Best regards,

Richard Stahler
3S664 Delles Rd., Naperville, IL 60563
(630) 505-7539

Kopinski, Sara

From: Egner, Therese
Sent: Wednesday, November 5, 2025 4:33 PM
To: Kopinski, Sara
Subject: FW: Proposed data center opposition

FYI- DEV-0057-2025

Therese Egner

Community Planner | Planning & Development - TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 420-4179 | egnert@naperville.il.us

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From: Kate <kateschleyer@gmail.com>
Sent: Wednesday, November 5, 2025 4:28 PM
To: Planning <Planning@naperville.il.us>; werhlis@naperville.il.us; Wilson, Nate <WilsonN@naperville.il.us>; White, Benny <WhiteB@naperville.il.us>; Syed, Ashfaq <SyedA@naperville.il.us>; McBroom, Josh <McBroomJ@naperville.il.us>; Jain, Supna <JainS@naperville.il.us>; Holzauer, Ian <Ian.Holzauer@naperville.il.us>; Gibson, Mary <GibsonM@naperville.il.us>; Kelly, Patrick <KellyP@naperville.il.us>
Subject: Proposed data center opposition

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Dear Planning and Zoning Committee and City Council members,

I oppose any data centers in Naperville. I urge the committee and city council to pause any votes on the proposed data center. I have serious concerns about how a data center will impact electricity and water usage. Our electric and water bills are currently outrageously high. The city is currently under stress with our energy needs and adding additional strain is not a wise choice.

An article from the Smithsonian reported on the impact data centers have on our environment and resources. The article states that data centers disrupt the electric grid infrastructure and increase greenhouse gas emissions. The cooling systems will put a strain on our water resources. From what I read, the land parcel is on an aquifer as well. The Alliance Great Lakes organization raises serious concerns for our finite water resource.

There is also the air and noise pollution to consider

I do not believe that our local and state governments are fully prepared for the long term impact data centers will have on our resources.

My hope is long term planning for residents will be a priority over a data center.

Thank you for reading.

Sincerely,
Katherine Schleyer
2748 Rolling Meadows Dr
Naperville, IL 60564

<https://www.smithsonianmag.com/science-nature/with-ai-on-the-rise-what-will-be-the-environmental-impacts-of-data-centers-180987379/>

<https://greatlakes.org/2025/08/great-lakes-region-unprepared-for-increasing-water-use-demands/>

Kopinski, Sara

From: Egner, Therese
Sent: Wednesday, November 5, 2025 4:33 PM
To: Kopinski, Sara
Subject: FW: KARIS DATA CENTER

FYI- DEV-0057-2025

Therese Egner

Community Planner | Planning & Development - TED Business Group
City of Naperville | 400 S. Eagle St. Naperville, IL 60540
(630) 420-4179 | egnert@naperville.il.us

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From: Jane Brueggemann <jbruegg630@gmail.com>
Sent: Wednesday, November 5, 2025 4:14 PM
To: Planning <Planning@naperville.il.us>
Subject: KARIS DATA CENTER

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Dear Naperville Planning and Zoning Committee:

Please do not approve the proposal for the Karis Critical Data Center. There are too many unanswered questions; and the results of environment and other community concerns will be felt for decades. **No amount of “conditions” can fully mitigate the risks. Once built, the impacts of the data center will be permanent and irreversible. I urge the City of Naperville Planning**

and Zoning Commission to deny this development in its entirety to protect the health, safety, and quality of life of its residents.

I know that the “NIMBY” acronym can applied to those in opposition. In this case, a dangerous unknown is proposed for our LITERAL BACK YARDS.

You may recall the horrible health effects experienced decades ago from the Naperville AMOCO chemical research facility. Several employees died of a rare brain cancer. AMOCO quietly settled with their families for untold millions, but couldn't bring those lives back. If a Planning and Zoning Commission had had the opportunity to prevent such tragedies, I hope that it would have.

Please take this opportunity to prevent would surely be unwanted results.

Thank you for consideration.

Jane Brueggemann
630 N. Sleight St.
Naperville

Kopinski, Sara

From: Egner, Therese
Sent: Wednesday, November 5, 2025 4:32 PM
To: Kopinski, Sara
Subject: FW: KARIS CRITICAL DEV-0057-2025

FYI- DEV-0057-2025

Therese Egner

Community Planner | Planning & Development - TED Business Group City of Naperville | 400 S. Eagle St. Naperville, IL 60540

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-----Original Message-----

From: riki I kauffman <rlkrak1992@gmail.com>
Sent: Wednesday, November 5, 2025 2:26 PM
To: Planning <Planning@naperville.il.us>
Subject: KARIS CRITICAL DEV-0057-2025

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Dear Planning and Zoning Commission Members,

My husband and I have been Naperville residents since 1951.

We are familiar with all of the changes that have occurred in our community, some good and some bad.

We ask that your decision be to not recommend the Karis Critical Data Center to the Naperville City Council.

We don't believe that the millions of dollars proposed by Karis Critical are comparable to their greed for our water and electricity. The damages caused by the operation of this center will contribute immensely to light, sound and air pollution against humans, wildlife and our planet.

Why do we want to destroy the quality of our environment by succumbing to the offerings of these billionaires. Is it worth it?

We don't think so.

Please say "No" to Karis Critical and protect all of us.

Thank you for reading this email.

Sincerely,
Robert Koelling
Riki Kauffman

Kopinski, Sara

From: Egner, Therese
Sent: Thursday, November 6, 2025 8:34 AM
To: Kopinski, Sara
Subject: FW: Letter from Physicians Opposing the Proposed Karis Data Center
Attachments: Letter to the Naperville Planning and Zoning Commission.pdf

FYI- DEV-0057-2025

Therese Egner

Community Planner | Planning & Development - TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

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From: Sujay Shah <sujs88@outlook.com>
Sent: Wednesday, November 5, 2025 6:17 PM
To: Planning <Planning@naperville.il.us>
Subject: Letter from Physicians Opposing the Proposed Karis Data Center

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Dear Members of the Planning and Zoning Commission,

My name is Sujay Shah and I am a physician in the Naper Commons neighborhood, which is directly adjacent to the proposed Karis Data Center. As a medical oncologist, I have significant concerns regarding the numerous health impacts on surrounding communities, especially for young children with this proposal. These concerns are also shared by a number of physicians. Please find attached a letter from 25 physicians in our community that outlines the health risks supported by objective data and references. We strongly urge the commission to reject the Karis data center proposal to ensure the health and safety of our children, our families, and our future.

Sincerely,
Sujoy Shah, M.D.

To the Naperville Planning and Zoning Commission

November 5th, 2025

Naperville Planning and Zoning Commission

400 S. Eagle Street

Naperville, IL 60540

Dear Members of the Planning and Zoning Commission,

Introduction: Community Concerns and Multiple Risks

We are writing as deeply concerned residents and physicians of Naperville to express our strong opposition to the proposed Karis data center. While this proposal is presented by the developer as a high-tech economic opportunity, it carries very real and well-documented public health risks that fall disproportionately on nearby neighborhoods including most critically, families with young children.

Although the developer has altered their original request to currently focus on Phase 1, the fundamental risks and concerns for surrounding communities (with many homes just hundreds of feet from the facility) remain significant. The possibility of future expansion poses an additional risk.

Locating a large heavy industrial data center immediately adjacent to residential neighborhoods brings multiple risks:

- Hazardous emissions, with the use of dozens of diesel generators, that can have substantial adverse health impacts.
- Increased noise pollution - in particular, constant low frequency noise which has reportedly been associated with migraines and sleep disturbances for members of communities that neighbor data centers.
- Adverse upstream environmental impacts due to massive and constant energy requirements. This is especially concerning considering that approximately 80% of Naperville's energy comes from dirty coal plants, meaning the environmental impacts likely will extend beyond the immediate surrounding communities.
- Potential for further long-term industrial expansion which would exacerbate all the risks above even more.

Combined, these factors threaten the health, safety, and overall quality of life for the neighboring communities. As research and community experience have repeatedly shown, industrial developments of this scale are not compatible with the needs of neighborhoods

focused on raising families and protecting children. The multitude of risks above collectively should raise substantial concerns for the Planning and Zoning Commission.

As physicians residing in the neighboring Naper Commons community, we take this opportunity with supporting data to specifically focus on and further detail the significant adverse health impacts that can occur due to the proposed data center for surrounding communities, particularly for young children.

Diesel Exhaust: A Persistent Hazard for Cancer and Respiratory Diseases

Diesel exhaust is a complex mix of fine particulate matter (PM_{2.5}), ultrafine particles (<100nm), nitrogen oxides (NOx), and more than 40 toxic organic compounds (including benzene and formaldehyde). The World Health Organization has classified diesel exhaust as a Group 1 human carcinogen way back in 2012 – this is the same category as tobacco and asbestos (IARC 2012). U.S. public-health agencies note that diesel exhaust and PM_{2.5} cause adverse cardiopulmonary and carcinogenic risks even at low exposures; regulatory assessments therefore treat such emissions as posing measurable health risk even at ambient concentrations (U.S. Environmental Protection Agency [EPA], 2019). Essentially this means that every time humans are exposed to any amount of diesel emissions the risk of adverse health outcomes such as cancer goes up. The table below outlines the short-term and long-term health risks of exposure to toxic components from diesel exhaust:

Pollutant	Short-Term Effects	Long-Term Risks
NOx	Airway inflammation, asthma exacerbation	Chronic bronchitis, reduced lung growth in children
PM_{2.5} / Ultra Fine Particles	Irritation, headaches, sleep disturbance	Heart disease, cancer, developmental toxicity

Tier 4 Diesel Generators Still Emit Carcinogens and Should Not Be Placed Next to Neighborhoods

The developer has stated that they will utilize Tier 4 backup diesel generators, which utilize the most advanced emission control systems available on the market. However, this is not a sufficient mitigation when you have multiple surrounding neighborhoods with young children. It is important to remember that Tier 4 diesel generators do not eliminate PM_{2.5} and NOx emissions and in fact with real world use during startup or idle/low load situations with short runs, there can be substantial short-term spikes of toxic emissions. This is due

to the fact that the emission control systems do not get a chance to operate at optimal efficiency (California Air Resources Board [ARB], 2010). This spike of toxic emissions for neighboring communities would be even more pronounced when there are many backup diesel generators that are being utilized (in this case a total of 24).

Moreover, Tier 4 emission controls do not effectively filter ultrafine particles (<100nm). In fact, peer-reviewed studies have shown that the after-treatment emission control systems can paradoxically produce large spikes in ultrafine particle number and promote formation of nitro-PAHs under real operating conditions (Heeb et al., 2008). Ultrafine particles are extremely dangerous because they are so small that as soon as one takes a breath these particles penetrate very deep inside the lungs where they sit permanently and can be directly absorbed into the blood stream and cause cardiovascular, respiratory, and genotoxic adverse effects (Kwon, Ryu, & Carlsten, 2020). This is acutely concerning for neighboring communities.

Naperville Already Has Very Poor Air Quality:

It is critical to recognize that Naperville already faces considerable air quality challenges, and any new source of diesel emissions must be evaluated in the context of this already existing elevated risk. According to the American Lung Association's 2025 "State of the Air" report, Naperville is part of a metropolitan region that ranks among the 15 worst in the entire United States for year-round particulate pollution with a grade of "F" (ALA 2025).

Illinois also already bears a disproportionate burden from diesel-related air pollution. The state ranks fifth in the nation for deaths per capita linked to fine particulate matter (PM_{2.5}) from diesel engine emissions. Although Illinois residents make up only 3.8% of the U.S. population, we account for an outsized 6.3% of asthma-related emergency department visits and 5.3% of heart attacks attributed to diesel pollution (Respiratory Health Association, 2022). These statistics make clear that Illinois communities are already overexposed to harmful diesel emissions. Even small additional releases such as those from monthly testing or backup operation of the proposed data center's 24 diesel generators would further burden an airshed that is already at risk and heighten health threats to surrounding neighborhoods.

Young Children Face Even Higher Risks Due to Developing Lungs

Young children are uniquely and severely vulnerable to air pollution and diesel emissions because their lungs and immune systems are not yet fully developed. From birth through adolescence, children's lungs continue to grow and form new alveoli—tiny air sacs responsible for oxygen exchange. According to the American Academy of Pediatrics (AAP),

this developmental process continues until about age 18, with the most rapid growth occurring during the first 8 years of life (Pediatrics, Vol. 123, 2009, "Health Effects of Air Pollution on Children").

The World Health Organization emphasizes that exposure to particulate matter and toxins during this critical period can reduce lung function, and increase lifetime susceptibility to respiratory illnesses (WHO, "Review of evidence on health aspects of air pollution," 2013). Children inhale more air per pound of body weight than adults and spend more time outdoors, meaning they can absorb proportionally higher quantities of airborne pollutants (Environmental Protection Agency, "Children's Health and Air Pollution," 2019), thereby increasing lifetime risk of respiratory disease including cancer.

This is further supported by multiple studies, including research from the Children's Health Study in Southern California, which demonstrated that exposure to diesel exhaust and fine particles (PM_{2.5}) during childhood can lead to permanent deficits in lung capacity and function (Gauderman et al., New England Journal of Medicine, 2004) that raises the risk of chronic asthma, bronchitis, and even lung cancer later in life.

The risks outlined above are not theoretical - a recent paper by researchers at UC Riverside and Caltech estimated that an increase in permits for backup diesel generators at data centers in Virginia since 2023 likely has led to 14,000 asthma cases and caused as much as \$300 million in health care costs (Han, Wu, Li, Wierman, & Ren, 2024). The adverse health impacts (and resultant public health economic impacts) over time in our community will far outweigh any initial investment or recurring revenue the developer has supposedly promised.

Contradiction to Naperville's Core Values

Naperville has built its reputation on being one of the best places in America to raise a family. In 2023, Money Magazine ranked Naperville #3 on its list of "Best Places to Live in America," citing the city's exceptional public schools, abundant green spaces, robust community resources and importantly, a strong commitment to public health (Money Magazine, 2023). The City's own 2021 Comprehensive Plan envisions Naperville as "a family-oriented community dedicated to providing a safe, healthy, and nurturing environment for children and residents." Introducing a large-scale, heavy industrial facility that utilizes dozens of diesel generators immediately next to neighborhoods with hundreds of young children directly contradicts these stated values and threatens the atmosphere that continues to attract families to our city.

Cumulative Effects and Urgent Appeal

The cumulative impact of the risks outlined above is clear. A heavy industrial facility does not belong next to neighborhoods. Allowing the Karis data center to operate in such close proximity to hundreds of families with young children would exacerbate existing health risks, can increase adverse health outcomes including asthma and cancer, and would not be aligned with Naperville's commitment to creating a safe and healthy environment for families—a vision supported by our community leaders and cherished by residents.

Allowing the Karis data center would also violate one of the critical standards for conditional use which states that any recommendation by the Planning and Zoning Commission and any decision by the City Council shall be predicated on evidence and findings that "the establishment, maintenance, or operation of the conditional use will not be detrimental to, or endanger the public health, safety, and general welfare" of surrounding communities.

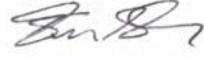
We strongly urge the Planning and Zoning Commission to sincerely consider the overwhelming evidence and protect the health and safety of Naperville families, including most importantly our young children. Please reject the Karis data center proposal.

Thank you for your thoughtful attention to this matter.

Sincerely,

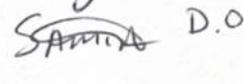
Physicians of Naper Commons

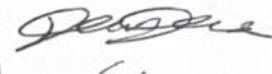
Suhail Khokhar, MD 

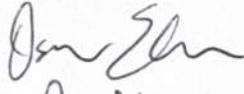
Sujay Shah, M.D. 

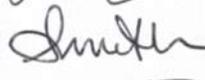
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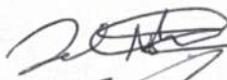
Asim K. Babar, M.D. 

Samia Qadir D.O.  D.O.

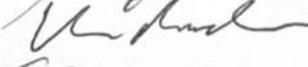
Dana Darwish MD 

Osama Elkhateb DO 

Swetha Nukala, MD 

Salman Syed, MD 

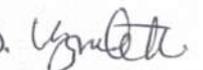
Faizan Khan MD 

Umair Randhawa, MD 

Shalin Desai, MD 

Vivek Cherian, MD 

Mohammed S. Ahmed, DO 

Uzma Kotrawala, M.D. 

Veenel Bhupathiraju MD 

Annabelle Brochnick, MD 

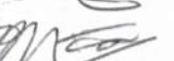
Archana Shukla, DO 

AMIR BARR, MD 

ASIM JUSUFI, MD, MPH 

Alia Jusufi 

Nadeem Mirza MD. 

NEAL MEHTA, MD 

Meena Sadaps, MD 

Maya Patel, MD 

References

American Academy of Pediatrics. (2009). *Policy statement: Ambient air pollution: Health hazards to children*. *Pediatrics*, 123(6), 1697–1704. <https://doi.org/10.1542/peds.2009-1632>

American Lung Association (ALA). (2025). *State of the Air 2025*. American Lung Association. <https://www.lung.org/research/sota>

California Air Resources Board. (2010). *Appendix B: Analysis of the Technical Feasibility and Costs of After-Treatment Controls on New Emergency Standby Engines (ATCM 2010)*. <https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2010/atcm2010/atcmappb.pdf>

U.S. Environmental Protection Agency. (2019). *Integrated Science Assessment (ISA) for Particulate Matter (EPA/600/R-19/188)*. U.S. EPA, Office of Research and Development, Washington, DC. <https://www.epa.gov/isa/integrated-science-assessment-isa-particulate-matter>

Environmental Protection Agency (EPA). (2019). *Children's health and air pollution*. U.S. Environmental Protection Agency. <https://www.epa.gov/children/childrens-health-and-air-pollution>

Gauderman, W. J., Avol, E., Gilliland, F., Vora, H., Thomas, D., Berhane, K., McConnell, R., Kuenzli, N., Lurmann, F., Rappaport, E., Margolis, H., Bates, D., & Peters, J. (2004). The effect of air pollution on lung development from 10 to 18 years of age. *New England Journal of Medicine*, 351(11), 1057–1067. <https://doi.org/10.1056/NEJMoa040610>

Han, Y., Wu, Z., Li, P., Wierman, A., & Ren, S. (2024). *The unpaid toll: Quantifying and addressing the public health impact of data centers* (arXiv preprint arXiv:2412.06288v2).

Heeb, N. V., Forss, A. M., Bach, C., Reimann, S., Herzog, A., & Jäckle, H. W. (2008). Paradoxical emissions of solid ultrafine particles from modern diesel passenger cars. *Environmental Science & Technology*, 42(15), 5664–5670. <https://doi.org/10.1021/es800240e>

International Agency for Research on Cancer (IARC). (2012). *Diesel and gasoline engine exhausts and some nitroarenes (IARC Monographs, Vol. 105)*. World Health Organization. <https://monographs.iarc.who.int/wp-content/uploads/2018/06/mono105.pdf>

Kwon, H. S., Ryu, M. H., & Carlsten, C. (2020). Ultrafine particles: Unique physicochemical properties relevant to health and disease. *Experimental & Molecular Medicine*, 52(3), 318–328. <https://doi.org/10.1038/s12276-020-0405-1>

Money Magazine. (2023). *Best places to live in America 2023*. <https://money.com/collection/best-places-to-live-2023/>

Respiratory Health Association. (2022). *The Dirty Dozen: The impact of diesel engine pollution in Illinois*. Respiratory Health Association of Metropolitan Chicago. <https://resphealth.org/wp-content/uploads/2022/05/Dirty-Dozen-Impact-of-Diesel-Engine-Pollution-in-Illinois.pdf>

World Health Organization (WHO). (2013). *Review of evidence on health aspects of air pollution – REVIHAAP Project: Technical report*. World Health Organization Regional Office for Europe. https://www.euro.who.int/__data/assets/pdf_file/0004/193108/REVIHAAP-Final-technical-report.pdf

Kopinski, Sara

From: Iwicki, Brad
Sent: Monday, November 3, 2025 9:37 AM
To: Kopinski, Sara
Subject: FW: 1960 Lucent Lane (Karis Critical Data Centers)

POD - Data Center public comment

Brad Iwicki

Assistant Planner | Planning & Development – TED Business Group City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 305-7021 | iwickib@naperville.il.us

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-----Original Message-----

From: tmbel <[REDACTED]>
Sent: Friday, October 31, 2025 9:52 PM
To: Planning <Planning@naperville.il.us>
Subject: 1960 Lucent Lane (Karis Critical Data Centers)

[You don't often get email from [REDACTED]. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

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Thank you for the opportunity to submit comments in opposition to the zoning request for the Karis Critical Data Center.

What may be a business decision to you is a life-changing decision for my family and my neighbors in Naper Commons that will have to live adjacent to it. This does not belong in a neighborhood with over 200 homes, most with young families who enjoy being outdoors.

Granting conditional use for this development will adversely affect the health, well being and quality of life of the Naper Commons residents and the surrounding area. We have major health concerns for our children related to the quality of air, noise pollutions and other potential irritants that we have seen harm our neighbors in Aurora.

It is also a disappointment that Naperville would have allowed Naper Commons to have been built, ensured that the natural land around it be preserved, only to destroy the safety and well being of the area and its residents. I respectfully ask you, would you want to share your neighborhood with a massive data center?

This development is a detriment and will endanger our public health, safety and general welfare. Allowing Karis to build this data center in our neighborhood is injurious to the use and enjoyment of Naper Commons, the very neighborhood you approved to be built and we all have made a great investment of our time and treasure in. Please do not allow this conditional use to be granted. Naperville can and should do better.

Thank you,

Teresa Belmonte
Naper Commons homeowner

Kopinski, Sara

From: Iwicki, Brad
Sent: Monday, November 3, 2025 9:38 AM
To: Kopinski, Sara
Subject: FW: Public hearing for DEV-0057-2025 Karis Critical Member, LLC

POD – Data Center public comment

Brad Iwicki

Assistant Planner | Planning & Development – TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 305-7021 | iwickib@naperville.il.us

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From: JD Butt [REDACTED]
Sent: Friday, October 31, 2025 1:56 PM
To: Planning <Planning@naperville.il.us>
Subject: Public hearing for DEV-0057-2025 Karis Critical Member, LLC

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Planning Board and Staff,

Aspects of the petitioner's non-enforceable "pledge" should be made as conditions of use with penalties. Words and promises in meetings under oath must be turned into requirements.

Just as words, presentations, and signs were used by prior petitioners saying properties would be "affordable housing" starting in the "mid-300's" where not a single house was sold for under \$500k.

Data centers directly adjacent to residential areas should have different conditions than data centers that are tucked inside a zoned industrial park.

Due to the petitioner not having any track record in building and operating data centers and not disclosing the third party that will be contracted to operate the data center the following restrictions should be requirements attached to the conditional use to ensure long term protections to the surrounding community.

Additional Recommended Conditions:

- 1.
- 2.
3. To reduce noise all rooftop mechanical units and other mechanical units on the Subject Property shall be screened to the
4. **4 feet above the full height of the** units/equipment by the building parapet wall. - Staff recommended an increase to the
5. height of equipment I am proposing going higher to limit sound better.
- 6.
- 7.
- 8.
9. Very much agree with staff recommended "Additional Noise Study" - Condition must clearly state from per the Illinois Control Board
10. Standard of sound emitted from Class B Land to Class A Land. However this study needs to have more than just R1-1 Receptors but all of the receptors from the submitted study. The study must also show models where the existing Nokia buildings are not there
11. as well as models with all generators running. The model with all of the generators running should not require remediation. The "Additional Noise Study" should be reviewed by a third party. Overall this study should serve as a baseline for compliance measurements
12. for the future.
- 13.
- 14.
- 15.
16. For 3 years - Perform a yearly sound study in compliance with Illinois Pollution Control Board (PCB) Standards to verify that noise
17. abatement procedures remain effective as the data center adds customers. Condition must clearly state from per the Illinois Control Board Standard of sound emitted from Class B Land to Class A Land.
- 18.
- 19.
- 20.
21. Set aside \$50k in funds so Naperville can purchase noise meters compliant with Illinois Pollution Control Board Standards and training
22. to ensure that enforcement actions can be conducted
- 23.
- 24.
- 25.
26. On violation petitioner should be required to utilize a third party noise consultant to assist in identification and remediation
27. of sounds at the data center site as well as at adjacent residential properties within 30 days and be required to resolve violation within 180 days of report.
- 28.
- 29.

- 30.
31. The petitioner should set aside \$2.25 million and Naperville should commit to work with the Illinois Department of Transportation
32. and the Illinois Tollway authority to construct a ½ mile sound wall along the north side of I-88 from Naperville road to west of Freedom Drive to reduce background noise in the area that will increase with the data center operations. Per the Illinois Department
33. of Transportation Highway Traffic Noise Assessment Manual June 2025 the cost of soundproofing is \$4.5 million per mile.
- 34.
- 35.
- 36.
37. Ensure generators are only used for emergency purposes or short testing periods where no more than 2 generators are to be run for
38. a maximum of 30 min at a time during normal 9-5 monday through friday
- 39.
- 40.
- 41.
42. Ensure that generators are not to be used during high power demand or during grid load shedding events
- 43.
- 44.
- 45.
46. Generators should be required to be Tier 4 compliant
- 47.
- 48.
- 49.
50. Equipment yards and not just generators should be fully enclosed within a building that has highly effective sound proofing to limit
51. outside noise propagation
- 52.
- 53.
- 54.
55. The data Center should meet the International Organization for Standardization's (ISO) 14001 environmental management standard and
56. complete yearly 3rd party audits with audit reports delivered to the City of Naperville.
- 57.

Thank You,

James Butt



Kopinski, Sara

From: Iwicki, Brad
Sent: Monday, November 3, 2025 9:40 AM
To: Kopinski, Sara
Subject: FW: DEV-0057-2025 Karis Critical Data Centers - PZC File 25-1103C
Attachments: image0.png; image1.png; image2.png; image3.png; image4.png; image5.png

POD – Data Center public comment

Brad Iwicki

Assistant Planner | Planning & Development – TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 305-7021 | iwickib@naperville.il.us

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From: Laurie D [REDACTED]
Sent: Sunday, November 2, 2025 11:59 AM
To: Planning <Planning@naperville.il.us>
Subject: DEV-0057-2025 Karis Critical Data Centers - PZC File 25-1103C

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Good afternoon,

For your visibility, Karis recently launched a paid promotional advertisement in favor of this development, which appears on Facebook. I have attached all of the community comments that I was able to screen grab before they were removed or hidden from Karis's advertisement page. I was not able to locate even one comment in favor of this project thus far.

Thank you for your consideration regarding this matter.

Laurie Johnson (Naperville Resident)

10:20



Naperville Data Center
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at the link below. Let's move Naperville forward together.



speak4.app
Show Your Support! Learn more

Like Comment Share

2

Most relevant

Patrice Basso · 14h
That building was built around 2000. I know people who worked there up until 2015-16. It has not been vacant for 25 years.
Reply 2

Frank McGee · 8h
Patrice Basso correct. The building was there and occupied until the end of 2018.
Reply 1

Write a comment... GIF

1:02



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FORM ON FACEBOOK
Support the Plan Learn more

Like Comment Share

15 1 share

Most relevant

Tim Stockdale · 18h
These things eat megawatts like a goose gobbles grass!
Reply

Jim Guzdziol · 1d
Build this noise polluter out in a corn field, not adjacent to residential neighborhoods!
Reply 2
View 1 reply

David Kleinberg · 20h
Electricity prices going UP UP UP!
Reply

Write a comment... GIF

10:22



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yes NO

Like Comment Share

12

2 shares

Most relevant

- Glenna Magee Pyzik** · 1d
No data center
Reply 1
- Tracy Gentile** · 14h
Not here
Reply
- Fred Turek** · 1d
How about providing some information instead of a content-free advertisement?
Reply 3
- Kurt Schlichting** · 1d
The are going to make energy prices skyrocket for citizens.
Reply 5
- Bob Loughman** · 1d
This is a pure BS video advertisement! The cost of electricity and taxes to residents will absolutely skyrocket! This can't be allowed to happen!
Reply 1

Write a comment...

7:55



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Rich Janor · 22h
OPPOSE! There are much better uses for the target property in Naperville.

Reply 2

Jeff P Knezovich · 4h
Watch you wish for!

Reply

Deb Yotka · 13h
Oppose. This is right next to the forest preserve and subdivisions. Go somewhere else.

Reply 1

Chrissy Tee · 23h
It will raise our electricity and water bills. Please build it somewhere else.

Reply 1

Brady Boehm · 5h
I see you deleted my comment from yesterday with the stats on long-term job creation, which is roughly what 30 to 50 people if we're lucky. Also included in my comment was a question about how you were going to mitigate the impact to the wildlife the water supply and the quality of life oaring the data center. Finally since you're gonna bring so much money to our community I think we can all agree that we expect our property taxes to decrease significantly. You can keep deleting my comment, but I will keep coming back

Write a comment...

7:56



Naperville Data Center
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Kurt Wenger · 1d
As long as it does NOT increase electricity rates!
Reply

Lynn Fox · 1d
Sell your BS somewhere else !! The people here are too educated to believe your used car salesman lines "local prosperity" We certainly don't need you for progress! You don't create a lot of jobs for the land you take up and you waste electricity and water for the surrounding communities, causing bills to go up. With extra land what will be snuck in down the road!! You certainly don't belong in a residential area!! Hard pass, see ya won't miss ya!
Reply 2

Cathi Borowiec Holic · 9h
All I've heard from people who currently live near data centers now is, lower water pressure, dust, noise, higher electric and water bills. Just say NO! We don't need it. Don't fall for the pitch of \$\$\$ for schools, jobs etc... it's not needed here!!
Reply

Renee Hubbard · 18h
This is not a good idea. Research and find out what this will do to the community?
Reply

Write a comment...

10:12



Naperville Data Center
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FORM ON FACEBOOK
Support the Plan [Learn more](#)

Like Comment Share
11 1 share

Most relevant

Dan Johnson · 1d
Oppose! Naperville does not need to settle for this on this property... They can do better!
Reply

Desiree Rahman · 1d
Will it increase our electricity costs? Water? Lots of homes built in the area in the past 25 years. Noise? I'm less concerned about Lucent property becoming "relevant" than the environmental and social impact on the area. Answer those questions and the solutions. This is a self serving ad that has no concern for those of us who live and work here
Reply 6

Most relevant is selected, so some comments may have been filtered out.

Write a comment...

Kopinski, Sara

From: Egner, Therese
Sent: Monday, November 3, 2025 9:49 AM
To: Kopinski, Sara
Subject: FW: Low Frequency Noise - request to be studied
Attachments: Critique of J&H Noise Study for Scotti.docx

FYI

Therese Egner

Community Planner | Planning & Development - TED Business Group
City of Naperville | 400 S. Eagle St. Naperville, IL 60540
(630) 420-4179 | egnert@naperville.il.us

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From: Linda Scotti [REDACTED]
Sent: Monday, November 3, 2025 6:43 AM
To: Planning <Planning@naperville.il.us>
Subject: Low Frequency Noise - request to be studied

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Please share this information with the Commission. Hopefully we will have the time to also present at the 11/5th meeting. Thank you very much for your attention in this matter.

Linda Scotti

<https://undark.org/2024/04/15/low-frequency-noise-health/>

November 2, 2025

To: Linda Scotti

From: Charles Vidich, MCP, SM

Subject: Analysis of the Karis Data Center Noise Study, dated September 26, 2025

The noise study prepared by Jacob & Hefner Associates (J&H), titled Noise Impact Assessment of Proposed Data Center at 1960 W. Laurent Lane, Naperville, IL 60563, has several critical flaws that weaken the conclusions as will be discussed below.

1. **Failure to Address Low Frequency Noise:** Because the J&H Associates only uses the Decibel A weighted scale, it fails to capture low frequency sounds. This is one of the key concerns raised by data centers across the United States. While the dB(A) standard addresses noise that falls within the human ear's normal hearing range, the sounds of critical concern generated by Data Centers also fall outside of that range. "Unlike high-frequency sounds, low frequency waves can penetrate walls more easily and carry farther distances, which is why a neighbor might only hear the heavy bass from a party down the street."¹ It is these low frequency sounds that have not been addressed by the J&H Associates noise study.
2. **Failure to include Estimates of Low Frequency Server Noise:** Once again, the J&H Associates study does not include the wide range of potential data servers that will be installed at the proposed data center. Data center servers are the generators of critical low frequency noise concern that makes them uniquely different than

¹ Lourdes Mendrano, UNDARK, [Low-frequency Noise Is Pervasive. Does That Matter?](#), April 15, 2024. This article is extremely useful for those unfamiliar with the impacts of low frequency noise. For example, in that article the author references the opinion of René Gifford, a professor of hearing and speech sciences at the Vanderbilt School of Medicine in Nashville, Tennessee. Dr. Gifford states "Low-frequency noise is typically perceived as a low-throbbing or deep rumble. When a freight train moves, for example, it produces vibrations that travel through the ground, moving long distances until they are perceived as both a shaking sensation and low pitch. And then there is infrasound, which is usually set below the human hearing threshold. In those lower frequencies, the normal variations in human hearing mean that this type of noise can be perceived as vibrations. "The vibratory effects can still impact various physiologic systems within our body," Gifford said. "It's just that we're not processing them through our hearing mechanism."

warehouses and similar industrial facilities. The J&H Associates study makes no mention of the number or kinds of data servers to be located on the site or how they will be distributed within the proposed facilities.

3. **Low Frequency Noise is not Captured using the dB(A) standard:** While J&H Associates have complied with the Naperville Planning and Zoning Commission requirement to evaluate noise based on the A weighted decibel scale, the root cause issue is that Naperville's noise regulations were not designed for the types of noises found in data centers. A recent statewide analysis of municipal noise regulations in Connecticut found that noise standards are uniformly deficient in addressing low frequency noise impacts. Highly concentrated data centers are a recent development in America and our municipal and even state level noise ordinances and regulations have not kept pace with this issue.

4. **Flaws in the Formulation of Noise Impact Zones:** The Naperville Noise regulations establish noise standards that vary by the zoning classification of land. For example, the noise regulations establish the most stringent noise protection standards for residential zones and progressively less restrictive standards for commercial, light industrial and industrial zones. This approach, while common among many municipal noise ordinances, fails to address specific land use specific concerns that may exist in any given zone. For example, the Science of Spirituality (SOS) Center located across the street in the Village Lisle is a place of meditation and functions as a church by typical zoning classification systems. The J&H Associates noise study failed to consider the SOS Center as a potential noise receptor that merits a higher level of noise protection than other uses in the Office Research (OR) zone in the adjoining Village of Lisle. Noise classification systems, such as those adopted by the Naperville Planning and Zoning Commission have not kept pace with the range of land uses that fall within broader zoning classifications. A church is place of peace and quietude even when located in an Office Research zone. The SOS Center property line is less than 250 feet from the nearest proposed data center building. J&H Associates may not have been aware of this sensitive receptor. Similarly, the Naperville Planning and Zoning Commission would benefit by not only establishing zone-based noise standards but also more specific standards for such uses as churches, wilderness areas and schools. Churches have long been given greater protections in zoning due to their value to the community as a place where quiet prayer, moral upliftment and spiritual growth can enliven our daily lives.

5. **Inter-Municipal Impacts:** Noise is not limited to municipal boundary lines. While Lisle is a separate government entity from Naperville, the Naperville zoning regulations explicitly require developers to notify all users within 300 feet of the proposed development. The regulations state that any conditional use permit must adhere to the following:

Written Notice: The petitioner shall give written notice of the public hearing or public meeting to the property owner of record of all parcels, lying in whole or in part within three hundred (300) feet, inclusive of public right-of-way, of the property lines of the property for which the action is requested, as reflected by the County property tax records which may be obtained at the applicable Township Assessor's Office.

The words "... applicable township assessor's office." Clearly underscore the requirement for intermunicipal notification for projects that require a conditional use permit. If the applicant was aware of this requirement, presumably they would not only have notified the SOS Center and other facilities within 300 feet but would also have included an assessment of the intermunicipal noise impacts associated with the proposed data center. The J&H Associates noise study missed this critical noise consideration.

6. **Third Party Noise Analysis:** The Naperville Planning and Zoning Commission should consider using a third party to complete a noise impact analysis funded by the applicant but with the contractor selected by the commission. For Naperville and Village of Lisle residents to have confidence in any noise impact analysis the work must be free of conflicts of interest. The J& H Associates study may have been prepared based on the best available information they were provided and the best available noise standards that Naperville's zoning ordinance has adopted, yet we are living in a time where the best available information is not adequate to address the unique noise issues we now face in Naperville and across the United States today.
7. **Conclusions and Recommendations:** The noise impact assessment prepared by J&H Associates falls far short of the requirements to address the unique types and frequencies of noise generated by data centers. Furthermore, the study failed to identify nearby sensitive receptors, address inter-municipal noise impacts or evaluate the full range of low frequency sounds associated with data centers. Low frequency amplification of data server noise from thousands of individual data

servers results in noise levels that may not be fully processed through our hearing mechanisms but have potential for significant adverse impact on human health in general and stress in particular. While sound barriers can filter some middle and high frequency noise, this is not the case with low frequency noise. The walls, windows and buildings located near to the data center will vibrate from low frequency noise based on their intensity and sound pressure. These noises cannot be filtered out by walls or noise barriers proposed by the data center applicant.

Naperville Planning and Zoning Commission should give serious consideration to denying the application for the data center and establishing a moratorium on future data centers until such time as there are more accurate noise impact standards and precise noise mitigation requirements incorporated into the zoning ordinance.

About the Author:

Charles Vidich is a professional land use planner with over 40 years of experience. He has served in various capacities including as a town planner, environmental manager, and consultant for developers, non-profit organizations and citizens in a wide range of land use litigation. Mr. Vidich has numerous publications on land use issues including noise mitigation studies, floodplain and wetland impact assessments, protecting public water supply watersheds, air pollution and communicable disease. He served on the faculty of the Harvard School of Public Health as a visiting scientist (2003-2011) and was appointed to the CT Council on Environmental Quality by the Speaker of the House (2016-2024).

From: speakersignup@naperville.il.us <speakersignup@naperville.il.us>

Sent: Friday, October 31, 2025 10:13 AM

To: Speaker Sign Up <speakersignup@naperville.il.us>

Subject: B/C Comment Form

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Name	Kate
City/State	Wheaton
Group/Organization	No
Board/Commission	Building Review Board
Meeting Date	11/05/2025
Participation Type	Support/Oppose
Comment Only - Agenda Item	
Comment Only - Comment	
Support/Oppose	Oppose
Support/Oppose - Agenda Item	Data Center

Name: **Kate**

Email: [REDACTED]

Phone: [REDACTED]

Acknowledgement: **Acknowledge Yes**



All Requests >



Support Center ³



Citizen Questions Intake Form

#W300591-103125



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Print Attachments Link Tools



Return



Citizen Questions Intake Form Details

* Name: Rabbi David Eber

* Addressed To: All (Mayor and Council members)

Question/Concern - If you want to ask a question or share a concern with your elected officials about a topic or situation in Naperville, please select this category. Providing details is helpful so that the City has information to look into the issue.

Feedback - If you would like to share your thoughts on a topic, proposal, or policy under consideration or already discussed by a city board or commission (for example, the Planning and Zoning Commission, Transportation Advisory Board, or City Council), please select this category.

Service Request - If you have an issue with a City service, such as electricity, water, sewer, streetlights, etc., or would like to provide input on the status or quality of City services, please select this option.

Thank You - If you would like to share thanks with the City's elected officials about a topic or a successful interaction or performance by City staff, please select this option.

Other - Any other submission type not covered by the above.

Please choose a request category and see the table below for category definitions

* Select a Category: Question/Concern

* Details: Hello Mayor and Council Members,

I urge city leaders to be strong advocates for our community first and foremost. You are expected to be accountable to our taxpayers and provide a thorough assessment of any project's potential environmental, economic and fiscal impacts on Naperville. The proposed data center that you are discussing on the 5th at the planning and zoning meeting, I am deeply concerned because 1) more attention should be given to those directly impacted and the consequences to the community as a whole and 2) the potential community impact on health issues, property values, environmental damage, among other factors that other communities with data centers have experienced, have not been shared with Naperville residents.

The proposed site is adjacent to several neighborhoods and forest preserve sites. Let's prioritize Naperville resident's quality of life and health, over welcoming data centers which won't provide serious economic benefit to justify such a burden.

Reference: W3005

Create: 10/31/2025

Original: 10/31/2025

Updated: 11/3/2025

Current: 10/31/2025

SLA Agreement: 1 Days

SLA Deadline: 1 Days

Close Date: 11/3/2025

Completed: Yes

Status: Closed

Priority: Medium

* Assigned: T.E.D. I

* Assigned: Sara K

Excluded:

Custom: David E

Email /



Request Updated

Citizen Questions Intake Form Details

Name: Jennie Eber

Addressed To: All (Mayor and Council members)

Question/Concern - If you want to ask a question or share a concern with your elected officials about a topic or situation in Naperville, please select this category. Providing details is helpful so that the City has information to look into the issue.

Feedback - If you would like to share your thoughts on a topic, proposal, or policy under consideration or already discussed by a city board or commission (for example, the Planning and Zoning Commission, Transportation Advisory Board, or City Council), please select this category.

Service Request - If you have an issue with a City service, such as electricity, water, sewer, streetlights, etc., or would like to provide input on the status or quality of City services, please select this option.

Thank You - If you would like to share thanks with the City's elected officials about a topic or a successful interaction or performance by City staff, please select this option.

Other - Any other submission type not covered by the above.

Please choose a request category and see the table below for category definitions

Select a Category: Question/Concern

Details: Hello, I am concerned about the possibility of a datacenter in Naperville. These data centers have shown to overuse vital resources, drive up utilities and taxes for residents, and not create jobs or substantial services for residents. I ask that you vote against any data centers or proposals as they would be detrimental to the community, the natural resources in our area, and strain our energy and water systems. This type of development will be a detriment to Naperville, not an asset. Thank you!

*****Only .pdf, .jpg, and .png file extensions will be accepted attachments.*****

Message History

Date
On 11/3/2025 1:31:46 PM, Planner on Duty (Generic User) wrote to [redacted]
Status: Pending. Cancel
Subject: City of Naperville Citizen Support Center - Service Request Updated :: W300584-103125
Body: Thank you for submitting comments on DEV-0057-2025, Karis Critical Data Center. Your comments will be emailed to the Planning and Zoning Commissioners in advance of the upcoming November 5th Public Hearing for their consideration.
On 10/31/2025 11:14:16 AM, System Generated Message to [redacted]
Body: Thank you for using the City of Naperville Help Center to send a submission to the Mayor and/or City Council members. Your submission has been forwarded to the appropriate individual (or individuals) you selected. Our goal is to respond to questions or concerns that require a response within two business days.
This is the reference number for your request: W300584-103125. You can monitor the status of your submission by clicking the link below:
https://napervilleil.mycusthelp.com/WEBAPP/_rs/RequestEdit.aspx?rid=300584&coid=
To access your submission or follow up on a response, you will need to create a Naperville Help Center account.
If you submitted a request for general information or service, your submission may be forwarded to the appropriate City department for response. If your request requires immediate attention, a phone directory of City departments can be found at www.naperville.il.us/contact-us.
On 10/31/2025 11:14:15 AM [redacted] wrote:
Request Created on Public Portal

Reference No W300584-10312

Create Date 10/31/2025 11:1

Original Creati 10/31/2025 11:1

Update Date 11/3/2025 1:33

Current SLA Sta 10/31/2025 11:1

SLA Age 1 Days

SLA Days Left 1 Days

Close Date 11/3/2025 1:31

Completed/Ct Yes

Status Closed

Priority Medium

Assigned Dept T.E.D. Business

Assigned Staff Sara Kopinski

Exclude from I

Customer Nam

Email Address jennie.eber@grr

Phone

Source Web

Source Mailbox (Not Specified)



All Requests >



Support Center ³



Citizen Questions Intake Form

#W300562-103125



Save New Message + Add Forward Print

Print Attachments Link Tools



Return



Citizen Questions Intake Form Details

* Name: Karen V Peck

* Addressed To: All (Mayor and Council members)

Question/Concern - If you want to ask a question or share a concern with your elected officials about a topic or situation in Naperville, please select this category. Providing details is helpful so that the City has information to look into the issue.

Feedback - If you would like to share your thoughts on a topic, proposal, or policy under consideration or already discussed by a city board or commission (for example, the Planning and Zoning Commission, Transportation Advisory Board, or City Council), please select this category.

Service Request - If you have an issue with a City service, such as electricity, water, sewer, streetlights, etc., or would like to provide input on the status or quality of City services, please select this option.

Thank You - If you would like to share thanks with the City's elected officials about a topic or a successful interaction or performance by City staff, please select this option.

Other - Any other submission type not covered by the above.

Please choose a request category and see the table below for category definitions

* Select a Category: Question/Concern

* Details: I urge the council to reject the proposal for a data center in Naperville and pause any vote on this subject until full exploration and transparency about the findings are shared with the community.

The proposed data center will increase Naperville's electricity demand by approximately 44%.* I am concerned that the proposed data center would be adjacent to residential neighborhoods and the DuPage Forest Preserve in Naperville. I am urging the Mayor and City Council to consider the project's environmental, economic, and health effects; long-term infrastructure needs, including maintenance of water and electricity use; and fiscal impacts on the people directly affected by this proposed data center before adopting such a center.

Thank you for your time and consideration.

Karen V. Peck

Reference I
W300562-1

Create Dat
10/31/2025

Original Cr
10/31/2025

Update Dat
11/3/2025 2

Required C
11/4/2025

Current SL
10/31/2025

SLA Age
1 Days

SLA Days L
1 Days

Completer
No

Status
Assigned

Priority
Medium

* Assigned I
T.E.D. Busir

* Assigned S
Sara Kopin:

Exclude fr

Customer I





All Requests >



Support Center ³



Citizen Questions Intake Form

#W300556-103125



Save New Message + Add Forward Print

Print Attachments Link Tools



Return



Citizen Questions Intake Form Details

* Name: Elaine Waite

* Addressed To: All (Mayor and Council members)

Question/Concern - If you want to ask a question or share a concern with your elected officials about a topic or situation in Naperville, please select this category. Providing details is helpful so that the City has information to look into the issue.

Feedback - If you would like to share your thoughts on a topic, proposal, or policy under consideration or already discussed by a city board or commission (for example, the Planning and Zoning Commission, Transportation Advisory Board, or City Council), please select this category.

Service Request - If you have an issue with a City service, such as electricity, water, sewer, streetlights, etc., or would like to provide input on the status or quality of City services, please select this option.

Thank You - If you would like to share thanks with the City's elected officials about a topic or a successful interaction or performance by City staff, please select this option.

Other - Any other submission type not covered by the above.

Please choose a request category and see the table below for category definitions

* Select a Category: Question/Concern

* Details: Please reject Naperville Data Center. It is not good for residents, is a waste of our water supply, and the cost will be passed on through our electric bills.

*****Only .pdf, .jpg, and .png file extensions will be accepted attachments.*****

Message History

Date

> On 10/31/2025 9:32:38 AM, System Generated Message to [REDACTED]

Body:

Thank you for using the City of Naperville Help Center to send a submission to the Mayor and/or City Council members. Your submission has been forwarded to the appropriate individual (or individuals) you selected. Our goal is to respond to questions or concerns that require a

Reference I
W300556-1

Create Dat
10/31/2025

Original Cr
10/31/2025

Update Dat
11/3/2025 8

Required C
11/4/2025

Current SL
10/31/2025

SLA Age
1 Days

SLA Days L
1 Days

Completer
No

Status
Assigned

Priority
Medium

* Assigned I
T.E.D. Busir

* Assigned S
Sara Kopin:

Exclude fr

Customer I
Elaine Wait

Kopinski, Sara

From: Egner, Therese
Sent: Monday, November 3, 2025 2:30 PM
To: Kopinski, Sara
Subject: FW: Please vote no on data center

FYI

Therese Egner
Community Planner | Planning & Development - TED Business Group City of Naperville | 400 S. Eagle St. Naperville, IL 60540
(630) 420-4179 | egnert@naperville.il.us

The City's online Civic Access portal is now live! Please use the following link to submit and manage your development cases: <https://napervilleil-energovweb.tylerhost.net/apps/SelfService#/home> All development invoices are now sent through the Civic Access portal. If you have any questions regarding your invoice, please contact your project manager.

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-----Original Message-----

From: Jackie Knasel [REDACTED]
Sent: Monday, November 3, 2025 2:28 PM
To: Planning <Planning@naperville.il.us>
Subject: Please vote no on data center

[You don't often get email from [REDACTED] Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

CAUTION: This e-mail originated outside of the City of Naperville (@naperville.il.us).

DO NOT click links or open attachments unless you confirm the incoming address of the sender and know the content is safe.

Please vote no on the Naperville data center. This project is near my neighborhood in Wheaton and the forest preserves. This project will produce air pollution, noise, pollution, water consumption, and a huge energy demand on the grid. Please vote no.
Thank you
Jackie Knasel
[REDACTED]
Wheaton 60189
Sent from my iPad

Kopinski, Sara

From: Egner, Therese
Sent: Monday, November 3, 2025 12:11 PM
To: Kopinski, Sara
Subject: FW: Public hearing for DEV-0057-2025 Karis Critical Member, LLC
Attachments: DCInconsistencies2.pdf; Yorkville data center overestimated its \$100M utility tax projections – Shaw Local.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

FYI

Therese Egner

Community Planner | Planning & Development - TED Business Group
City of Naperville | 400 S. Eagle St. Naperville, IL 60540
(630) 420-4179 | egnert@naperville.il.us

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From: JD Butt <[REDACTED]>
Sent: Monday, November 3, 2025 11:52 AM
To: Planning <Planning@naperville.il.us>
Subject: Public hearing for DEV-0057-2025 Karis Critical Member, LLC

CAUTION: This e-mail originated outside of the City of Naperville (@naperville.il.us).

DO NOT click links or open attachments unless you confirm the incoming address of the sender and know the content is safe.

Staff and Board Members,

I can only imagine you may be cringing with the sight of my name at this point and I am sorry - I have tried my best to share my concerns in as professional a way as possible with limited resources. These are complicated issues and lots of money is being spent by the petitioner to craft narratives that tell a story that is different from reality. Your job to fully understand the intricacies of a project like this are understandably very hard.

The updates of new documents posted the Friday before the meetings from the petitioner that now we have only a few days to react to is problematic. Some of the released documents based on their dates have clearly been held from public view until the very last minute.

While I have specifically tried to stay away from anything that was not related to your decision such as tax revenue. I think that it is important to note that there are many inconsistencies with the data that the petitioner has presented and they are overstating tax revenues by between 50% to 150% and as a result Naperville would be far better off with that plot of land being homes from a tax perspective.

I will be providing a peer and CPA reviewed analysis to the city council in the event this makes it that far. This is one of my direct areas of expertise and it has not been relevant to zoning.

Someone forwarded the following article this morning where the Yorkville City Administrator has realized that a proposed data center will not provide the utility tax that the developer has stated.

"Yorkville data center overestimated its \$100M utility tax projections" - "City says it will be 'a fraction' of that"

<https://www.shawlocal.com/kendall-county-now/2025/08/21/yorkville-data-center-overestimated-its-100m-utility-tax-projections/>

I have attached this article as it may be behind a paywall.

This is not just me seeing some of these things but this is part of an apparent playbook by the data center developers.

Pressure to approve based on "taxes" should not be part of your decision making process.

Relevant to your decision is:

However I would pay close attention to the "Housing Trends Impact Analysis and the inconsistencies in the letter they submitted about the size of the HVAC units to the size of the HVAC units in the sound study! 550 Ton vs 300 ton is a big difference!!

I am attaching part of my presentation because I think it is important you are able to check my work if you have any questions - I have provided reference data.

I believe that the "The Housing Trends Impact Analysis" the petitioner submitted should be entirely disregarded - I keep saying some of the same things - this is like comparing a canoe to a cargo ship- they are both boats. The 5 data centers they are using as a comparison all add up to less power and less generators than the proposed development. How are they even relevant?

The developer can not provide data that provides proof that this development will not impact adjacent property values and you have to think about if you would personally buy a home adjacent to it?

The small errors and omissions start to add up and start to develop a narrative of their own.

Thank You,

James Butt



Noise Study Used Incorrect Assumptions

Naperville Data Center Site
1960 W. Lucent Lane, Naperville, IL 60563



CARLSON
Design Group

5550 Peachtree Parkway, Ste 125
Peachtree Corners, GA 30092

777 Woodward Av Ste 300
Detroit, MI 48226

313.963.8000
313.963.8150 fax

f. The four (4) generators modeled were along the northeast corner (nearest the residential property and most sensitive receptor R1-1

- HVAC

a. Spectrum profile of HVAC units is assumed based on similarity for 300 and 400-ton units.

October 14, 2025

Mr. Russell G. Whitaker, III
Rosanova & Whitaker, Ltd.
445 Jackson Ave., Suite 200
Naperville, IL 60540

RE: Karis -Chiller Selection for Noise Study

Dear Mr. Whitaker:

Carlson Design Group is the Engineer of Record for Mechanical Engineering Services associated with the Karis Critical Data Center located at 1690 West Lucent Lane, Naperville, IL 60563. This letter serves to detail the design basis for the selection and performance criteria for the air-cooled chillers chosen to support the cooling requirements for the 36MW critical load, including related electrical and building systems. It further explains how this data informed the subsequent noise study performed by the designated sound consultant.

The data center is proposed to be built on the site of the former Lucent Technologies Office Building. It will use twenty-four (24) Trane ACR-450 air-cooled screw chillers with N+1 redundancy, each producing 555 tons (1,951kW) of chilled water at a 99.5°F ambient temperature, 60°F leaving temperature, and a 14°F Delta-T, operating at approximately 0.93kW/Ton. The chillers feature Trane's Invisisound technology for noise reduction and will run continuously to maximize energy efficiency and minimize sound transmission.

- 54% difference between 300 tons and 555 tons
- Background noise dates
- Excluded days
- Benefits of adjacent building shielding sound

Do they not know or not want us to know?

- Carlson Design Group - States:
“(24) Trane ACR-450 air-cooled screw chillers with N+1 redundancy, each producing 555 tons”
- Trane model numbers are actually 45 digits long
- They site ACR-450 but then say 455 tons
- Trane has detailed 9-octave sound data available—why did they not use it?
- Same issue goes for generators!
- What is it?
- Details matter!



Model Number Descriptions

Unit Model Number

Digit 1, 2, 3, 4 – Unit Model

ACRB = Air-Cooled Screw Chiller

Digit 5, 6, 7 – Nominal Tonnage

150 = 150 Tons
165 = 165 Tons
180 = 180 Tons
200 = 200 Tons
225 = 225 Tons
250 = 250 Tons
275 = 275 Tons
300 = 300 Tons
375 = 375 Tons
~~380 = 380 Tons~~
440 = 440 Tons
450 = 450 Tons
~~500 = 500 Tons~~
550 = 550 Tons

Digit 8 – Compressor Type

4 = Mixed screw types
5 = Screw with Variable Volume Ratio

Digit 9 – Unit Voltage

A = 200/60/3
B = 230/60/3
C = 380/60/3
D = 400/60/3
E = 460/60/3
F = 575/60/3
G = 400/50/3
H = 380/50/3

Digit 10 – Manufacturing Location

U = Trane Commercial Systems

Digit 15 – Pressure Vessel Code

U = ASME Pressure Vessel Code
C = CRN or Canadian Equivalent Pressure Vessel Code
A = Australia Pressure Vessel Code

Digit 16 – Factory Charge

C = Refrigerant Charge R-134a
D = Nitrogen Charge, R-134a Field Supplied

Digit 17 – Auxiliary Items

X = No Auxiliary Items

Digit 18 – Evaporator Application

N = Standard Cooling
P = Low Temp Process Cooling
C = Ice Making

Digit 19, 20 – Evaporator Type

C1 = CHIL 1-pass
C2 = CHIL 2-pass
C3 = CHIL 3-pass
D1 = CHIL 1-pass with ALT tube
D2 = CHIL 2-pass with ALT tube

Digit 21 – Water Connection

X = Grooved Pipe
A = Grooved Pipe + Flange

Digit 22 – Flow Switch

C = Flow Switch Set Point 15 cm/sec
D = Flow Switch Set Point 25 cm/sec
F = Flow Switch Set Point 35 cm/sec

Digit 25 – Condenser Length

A = 4V Condenser Coil Modules
B = 5V Condenser Coil Modules
C = 6V Condenser Coil Modules
D = 7V Condenser Coil Modules
E = 8V Condenser Coil Modules
F = 9V Condenser Coil Modules
H = 11V Condenser Coil Modules

Digit 26 – Condenser Fin Options

A = Aluminum Round Tube, Aluminum Plate Fin
C = Coated Microchannel
D = CompleteCoat™ Epoxy Coated Aluminum Fins, Aluminum Round Tube
K = Coated Copper Round Tube, Aluminum Plate Fin
M = Aluminum Microchannel
R = Copper Round Tube, Aluminum Plate Fin

Digit 27 – Fan Type

E = EC Condenser Fan Motors

Digit 28 – Compressor Starter

V = Variable Frequency Drive (1 compressor/circuit)

Digit 29 – Incoming Unit Power Line Connection

1 = Single Point Power
2 = Dual Point Unit Power Connection
3 = Single Point Power including 115V

Digit 30 – Power Line Connection Type

T = Terminal Block

Land Classes mapped to ORI Uses

LBCS		Description	35 IAC 901 Land Class
Main Category	Function Code		
Residence or accommodation functions	1000	Residence or accommodation functions	A
	1100	Private household	
	1200	Housing services for the elderly	
	1210	Retirement housing services	<input type="checkbox"/>
	1220	Congregate living services	<input type="checkbox"/>
	1230	Assisted-living services	<input type="checkbox"/>
	1240	Life care or continuing care services	<input type="checkbox"/>
	1250	Skilled-nursing services	<input type="checkbox"/>
	1300	Hotels, motels, or other accommodation services	
	1310	Bed and breakfast inn	<input type="checkbox"/>
	1320	Rooming and boarding	<input type="checkbox"/>
	1330	Hotel, motel, or tourist court	
	1340	Casino hotel	A
vices	2000	General sales or services	
	2100	Retail sales or service	B
	2110	Automobile sales or service establishment	
	2111	Car dealer	
	2112	Bus, truck, mobile homes, or large vehicles	<input type="checkbox"/>
	2113	Bicycle, motorcycle, ATV, etc.	<input type="checkbox"/>
	2114	Boat or marine craft dealer	<input type="checkbox"/>
	2115	Parts, accessories, or tires	<input type="checkbox"/>
	2116	Gasoline service	<input type="checkbox"/>
	2120	Heavy consumer goods sales or service	<input type="checkbox"/>

- Banks and financial institutions: Land Class B
- Civic buildings: Land Class B
- Engineering and testing laboratories and offices: Land Class A
- Life sciences facilities: Land Class A
- Offices—Business or professional: Land Class A
- Offices/clinics—Medical or dental: Land Class A
- Fitness facility: B
- Cannabis-dispensing organization per Section 6-2-32 of this Title.
- Sleep clinics: A

Noise Study Response – Industrial or Not?



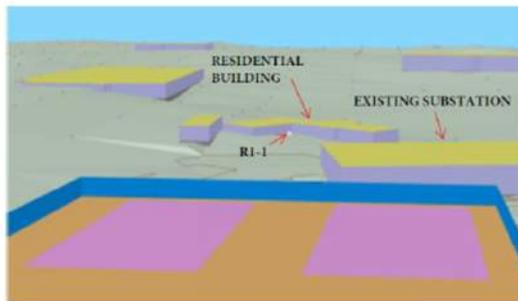
IPCB

Illinois Pollution Control Board

Naperville Data Center Site – Response to Comment (RTC)
1960 W. Lucent Lane, Naperville, IL 60563



JACOB & HEFNER
ASSOCIATES



"While not required by the City's ordinance, as a best management practice we would recommend that Jacob and Hefner compare the proposed noise levels to the Illinois Pollution Control Board (IPCB) standards to ensure that none of the nine octave bands are exceeded, at the closest residential receptor (R1-1). If there are any exceedances to any of the nine octave bands, please provide proposed mitigation"

JHA ran the updated model with spectral analysis of single octave pressure bands. The property use is considered Class C as listed in IAC 901 and the R1-1 receptor is listed as Class A. As a result, JHA screened the octave pressure band emissions against regulators standards for a Class C emitter to a Class A receiver for daytime (Leq-D), loudest daytime hour (Leq-Max hr), and nighttime (Leq-N) time slices. The results are provided below:

	Class C Land	Class B Land	Class A Land
31.5	75	72	72
63	74	71	71
125	69	65	65
250	64	57	57
500	58	51	51
1000	52	45	45
2000	47	39	39
4000	43	34	34
8000	40	32	32

- They say Class C but do not indicate the LBSC function code – data center is not listed in Illinois rules
 - – Closest is 4240 Information services and data processing industries
- Classes are mostly heavy industrial



Rosanova & Whitaker, Ltd

Data Center Pricing Impact Analysis

City of Naperville, DuPage County, Illinois

October 2025

Chirisa Data Center - Volo

- 5 water-based chillers
 - Much quieter
 - Vs. 24 air-based chillers
- 3 generators vs. 24
- 14 MW vs. 36MW
- 38% the size!



<https://www.datacentermap.com/usa/illinois/chicago/chirisa-volo-technology-park/>

Centersquare Data Center - Lisle

- Multi-use building with office space
- Former ATT facility (30+ years old)
- 8 smaller generators vs. 24

7 water-based chillers

- Much quieter
- Vs. 24 air-based chillers
- Various normal office units on roof

- 15 MW vs. 36MW

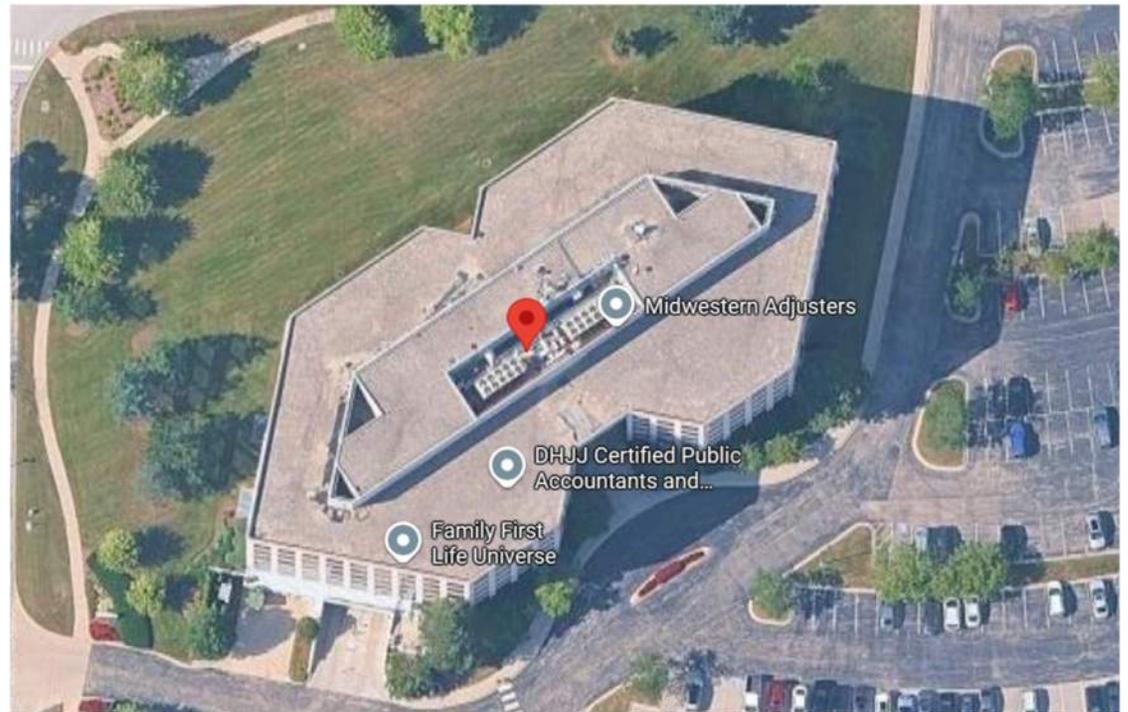
- 41% the size



<https://www.datacenters.com/centersquare-chicago-ch1-lisle>

WOWaccess Data Center - Naperville

- Typical office building
- Does not appear to be offering services any longer
- One internal diesel generator, operating at 350 amps
($350 * 480 = 168\text{kW}$)
- < 0.5 MW
- 1.3% of the size!

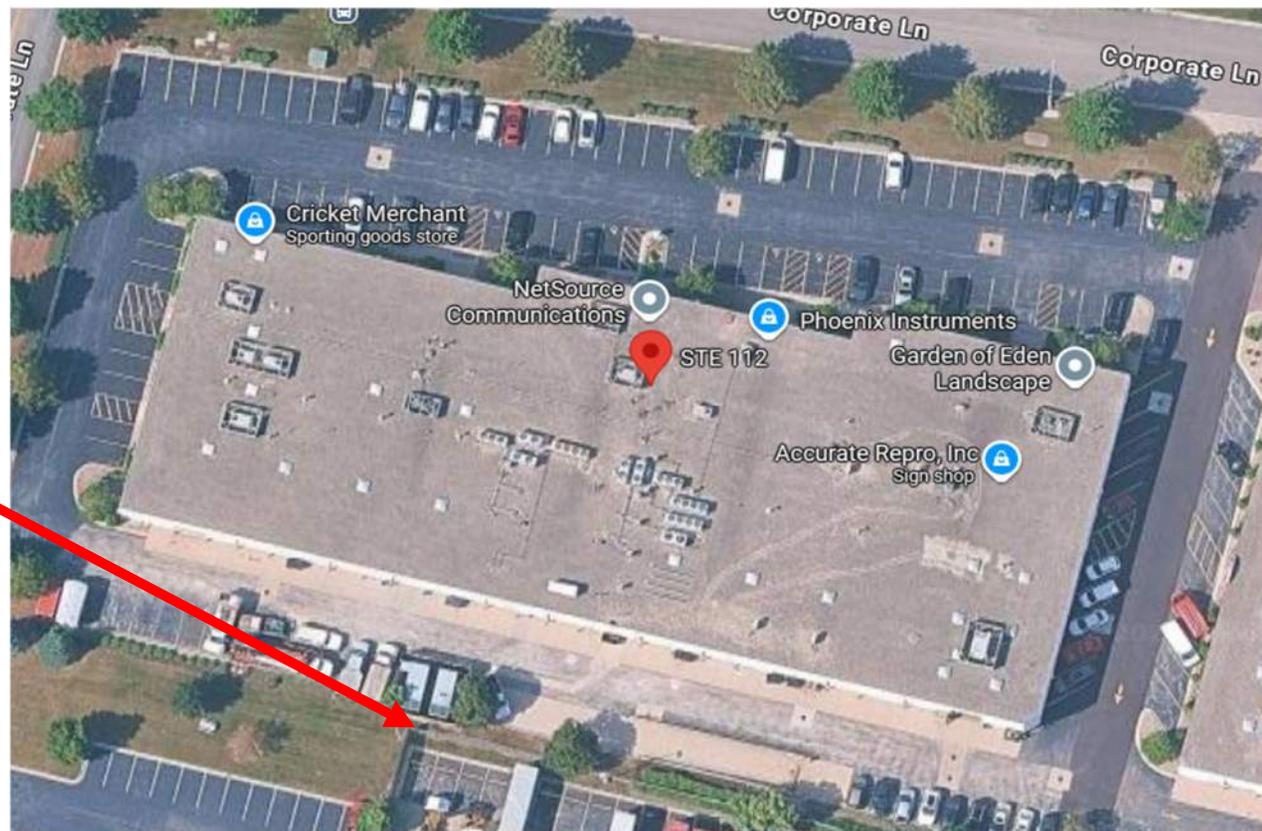


<https://cloudandcolocation.com/datacenters/wow-access-naperville-datacenter/>

NetSource Naperville Data Center

- Multi-tenant building
- 2 small generators vs. 24 very large
- 0.8 MW vs. 36 MW

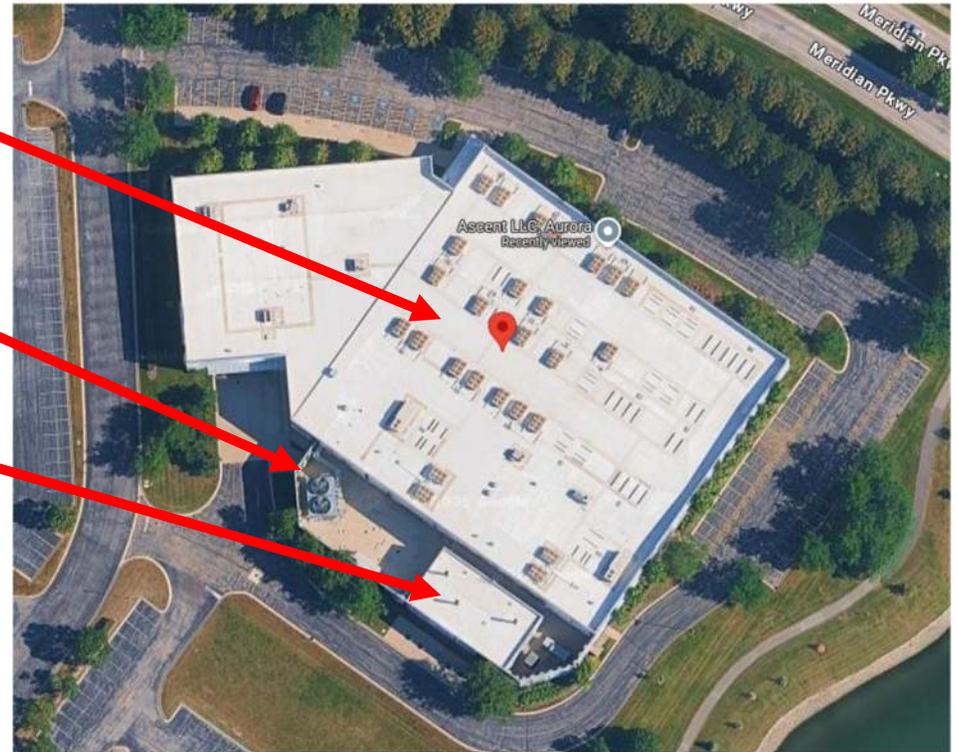
2% the size!



<https://www.netsource.com/web-hosting/chicago-datacenter/>

ByteGrid Data Center - Naperville

- Various roof-top chillers may be for other tenants
- 2 water-based chillers vs. 24 air
- 3 fully enclosed generators
- 3.5MW vs. 36MW
- 9% of proposed!



<https://inflect.com/building/4267-meridian-parkway-aurora/bytegrid/datacenter/aurora-chicago>

Clearly, these are not the same types of facilities...

- I would not be standing here if they proposed one of these facilities! It is clear this is now they want the public to perceive the data center.
- These 5 facilities **ADD UP** to **33.8MW**, smaller than the single proposed **36 MW** facility
- **17** total generators combined vs proposed **24**
- Inaccuracies invalidate the “Data Center Pricing Impact Report”
- The “Fiscal Impact” assessment while not applicable to this decision significantly overstates tax revenue impact to the city and will be addressed with City Council
- This board and the public is being misled
- Either they think we are dumb or they have no business building a data center or representing clients building a data center.

Yorkville data center overestimated its \$100M utility tax projections

City says it will be 'a fraction' of that

August 25, 2025 at 6:01 am CDT

✕ Expand



The 14 two-story warehouses that would comprise the 'Project Cardinal' data center proposal in Yorkville would span over 17 million square feet. (Photo Provided By The City of Yorkville)

By Joey Weslo

The \$100 million in projected utility tax revenue for the 1,037 acre Project Cardinal data center in Yorkville is getting drastically revised.

“That number was an error, the actual number is probably a fraction of that,” City Administrator Bart Olson said during the Aug. 12 city council meeting.

“I don’t know if it’s 50% or 10%, but we have asked them to provide updated figures. We haven’t planned for the use of any of that revenue and we will be providing updated numbers when they find out,” he said.

While the initial estimate for utility taxes is getting reviewed, the site will still generate millions in property taxes for the city, officials have said.

Olson previously said each of the data center buildings could generate between \$500,000 and \$1 million annually in overall taxes. It hasn’t been stated how the new projections figure into these past figures.

Pioneer Development, LLC, is proposing 14 two-story data center warehouses totaling more than 17 million square feet. The campus would include two electrical substations and 3,750 total parking spaces. The construction would be phased, with full completion expected to take up to 10 years.

The campus site, which must be rezoned to manufacturing, is located northwest of Illinois Route 47 and Galena Road, south of Baseline Road, and east of Ashe Road.

Sound pollution still an issue

Of chief concerns for neighboring residents is the sound pollution. Equestrian Estates at 14 Legacy Farms is located to the west, and the Bristol Bay Subdivision is located to the east of the project site.

According to the sound study, the data center's sound pollution will range from 55 to 60 decibels during the day, decreasing to 35-40 decibels at night, because of less generators operating.

Sound pollution in receiving residential areas is limited to 60 decibels during the day and 50 decibels at night, according to the city's municipal codebook.

Sound pollution from a typical highway usually ranges from 70-80 decibels received at nearby properties.

"I just can't explain how detrimental this will be for my livelihood, I moved out here for the peace and quiet," John Bryan, resident of Legacy Estates, said during the Aug. 12 meeting. "I never received a notice at my homestead about this development and I'm 750 feet away. You hear about horror stories of the noise often from a mile away."

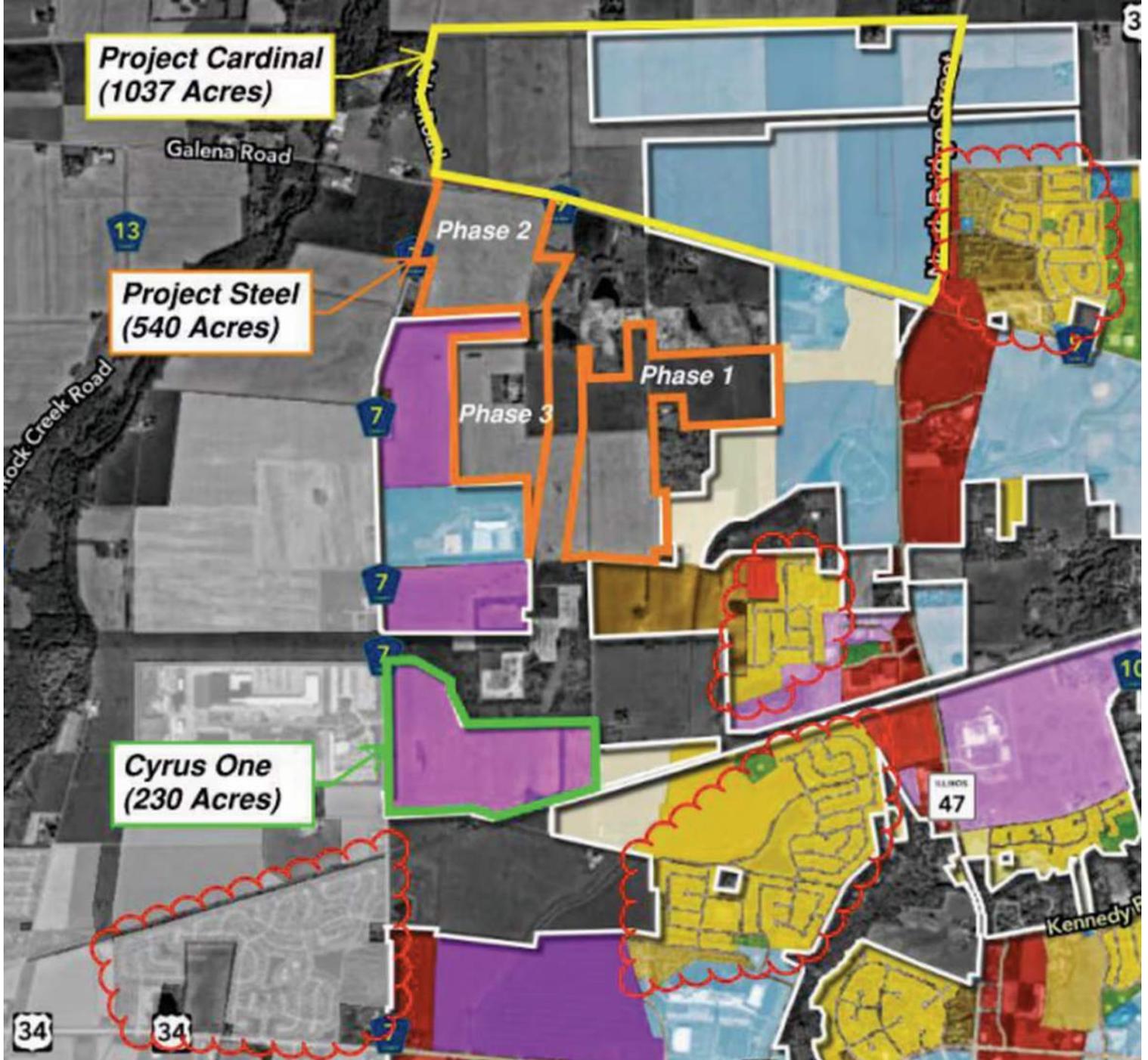
Bryan said construction of the site should start east to west to enable Illinois Route 47's traffic din to drown out the data center's noise pollution. He said developer's plans to start from west to east is detrimental to those living on the project's western flank.

Bryan said he's also particularly concerned with the noise of the construction equipment and traffic during construction, especially with the building period expected to last over a decade.

During the meeting, Olson said the developers of Project Cardinal said they are working on a revised land use plan that will shrink the footprint of the site. The new layout should include further setbacks from residential neighbors on all sides. For example, the first building will be moved another 500-600 feet east with enhanced landscaping planted.

Contentions over Project Steel

With over 3,000 acres of land in Yorkville slated for future data center development along the Eldamain Road Corridor, some inter-developer disagreements are popping up.



Project Cardinal is a 1,037 acre data center proposal in the Yorkville area. Project Steel is a nearby 540 acre data center proposal. The CyrusOne data center has already been approved by city officials. (Provided By The City of Yorkville)

Green Door Capital and Yorkville Nexus LLC sent a formal letter to the city condemning Prologis L.P.'s 540-acre Project Steel data center plans. The letter objects to the vacation of West Beecher Road adjacent to the former Hagemann Property. They also oppose the rerouting of Beecher Road through the former Meyer Property. All the locations are sites for new data center developments.

In the letter, the developers argue the plans would devalue business development on their sites because the plans reduce access points to their properties.

Compounding the site plan objections, Dan Nagel, commissioner of [the Rob Roy Drainage District](#), said they have not been contacted at all regarding water drainage plans for either Project Steel or Project Cardinal.

The immense size of the two developments will mean heavy planning is needed to deal with “quite a bit of drainage,” Nagel said.

The planning and zoning committee agreed Aug. 13 to move forward with recommending the rezoning and PUD approval to city council for both Project Steel and Project Cardinal.

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Joey Weslo

Joey Weslo is a reporter for Shaw Local News Network



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Kopinski, Sara

From: Egner, Therese
Sent: Tuesday, November 4, 2025 8:23 AM
To: Kopinski, Sara
Subject: FW: DEV-0057-2025 – Public Hearing for 1960 Lucent Lane – PZC File 25-1103C

FYI

Therese Egner

Community Planner | Planning & Development - TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 420-4179 | egnert@naperville.il.us

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From: Dan Johnson [REDACTED]
Sent: Monday, November 3, 2025 10:05 PM
To: Planning <Planning@naperville.il.us>
Subject: DEV-0057-2025 – Public Hearing for 1960 Lucent Lane – PZC File 25-1103C

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Good Evening,

I would like to submit the following to the PZC for the subject development on the Agenda this Wednesday.

My name is Dan Johnson. My family and I live on Weatherbee Lane in Naper Commons. Our home has a direct line of sight on the proposed development.

To recap the recent history of the property as it relates to the neighboring Pulte development:

- In 2020, a portion of the Nokia property was subdivided and re-zoned from ORI to Residential.

- In 2021, the PUD for Naper Commons was approved, clearing the way for Pulte Homes to begin construction.
- In 2022, City Council approved the Land Use Master Plan which shows the remaining portion of the Nokia property to be Medium Density Residential. Naper Commons residents begin moving in.
- In 2023, the City amended the ORI Zoning to allow data centers as a Conditional Use in ORI and the Lucent building was torn down
- In 2024, the property sat vacant while residents continued to purchase homes in Naper Commons.
- In early 2025, Pulte closed on all of their homes in Naper Commons and handed the community over to the residents.
- Around the 2nd/3rd quarter of 2025, after all the residents had moved in, and Pulte Homes no longer had an interest in the property, the petitioner announced their plan for a data center. This begs the question of whether the petitioner waited to announce the development until after Pulte was out of the picture, and if so, why?

Now, in an apparent effort to alleviate concerns about the effect of the datacenter on adjacent home prices, the petitioner submitted a “Pricing Impact Analysis” for home sales near data centers. Now, the first paragraph of the analysis notes that “many other data centers in DuPage county are **not** near residential neighborhoods, so they are not included in this analysis”. That kind of says it all, but let’s take a look.

The analysis includes five datacenters. Four of the data centers are located within nondescript buildings that house other tenants, and obviously don’t include the fortifications proposed for this development (including barbed wire fences and tire spikes). The fifth location in Volo is the only reasonable comparison to this development. I personally hadn’t heard of this town until I read the report... that’s because it’s 50 miles away in rural Lake County. This is a standalone datacenter with similar fortifications proposed for this development, and with residents in close proximity. At a glance, it matches. However, looking into the specs, this is only a 14 MW data center at the time of the analysis (there are plans to expand this to 28 MW – take note these things grow). Additionally, the key point is that this data center was constructed prior to the adjacent community. The fact is that those residents were aware that there was a standalone datacenter next door when they made their purchase, and their homes were priced accordingly. So basically, all that this study really shows is that homes next to datacenters appreciate similarly to the overall market. The analysis does not represent any findings of the effect of a **new** datacenter on **existing** homes. So, unless they omitted data about new data centers next to existing homes, the petitioner accidentally demonstrated that there is no precedent for this project in DuPage County. Why is there no precedent? I would suggest it’s because communities don’t usually build data centers adjacent to established neighborhoods. People generally don’t want to live next to datacenters, and home prices will reflect that. So that’s my guess as to why the petitioner didn’t announce the development while Pulte was selling homes in Naper Commons.

The Petitioner is also highlighting sound study results that suggest the data center noise will not be disruptive to the neighboring community. When this development was announced, I was surprised (given the city’s master plan) but optimistic. I thought that anything could be better than the pile of rocks and dirt that we’d been driving by for the last two years, and was honestly disappointed that the City hadn’t collected revenue from the land for so long. So, when my daughter asked what a datacenter was, I packed the family up in the car to go see a similarly sized facility in Aurora. I’ll ask the question now: Have you all been to one of the nearby datacenters that is comparable in size? It’s legitimately

disturbing. The facilities emit constant noise. That fact is not contested, and the basis for the opposition should be readily apparent when you hear it. I strongly encourage you to at least visit what you're voting for before making a decision.

Now, to speak to this particular sound study, it's important to note that it assumes the Nokia building will act as a permanent sound barrier. That building is over 60 years old. Let's explore the impact of the likely scenario that that structure is demolished in the near future.

I've roughly sketched in the contours of what it looks like the sound bands will be after the building is torn down. The effect is that it looks like 75 adjacent homes will be in the zone of influence of the datacenter. Although the question of what to do with that building isn't on the table today, it will be in the future. And when that time comes, the City will be in an unfortunate situation of their own making if there is a 36 MW datacenter next door (with a plan to expand to 72 MW as currently stated on their website). The City will eventually be forced to allow a developer to tear down a building and unleash the noise on the adjacent residents. And it won't be a surprise when that time comes. As the **planning** and zoning committee, I hope you can follow the City's master **plan**, which would eliminate this situation. If not, I'd at least suggest constructing something that doesn't poison the well for the adjacent property when it's time to tear down that Nokia building.

I also want to touch on the fact that the petitioner has begun running paid advertisements on social media promoting the development.

The advertisement includes materially false claims, including that the property has "40 acres of land that has sat vacant for the past 25 years". They appear to have confused the date that the building was completed with the date that the building was vacated. Construction of the building wasn't completed until 2000. The advertisement also states that the project will "create and sustain 341 jobs". As you know from their testimony, that is just not correct (unless they're already factoring in their expansion).

The advertisement also contains a direct link which requests signature of a pre-authored letter to City Council in support of the project, which includes those false claims.

Bottom line, the petitioner has called their own credibility into question with the timing of the announcement of the development, submitting a property analysis without any relevant comparisons, and including false claims as a basis to collect signatures in support of the project. I think this reveals their nature... approval at all costs. I think that this nature should be taken into account when evaluating what other promises that they are making as you are making your decisions. The future is watching and it's probably not as far away as we think.

Thank you for your time and service to this community. I urge you all to oppose this development, since it's the right thing to do.

Thank You,
Dan Johnson

Kopinski, Sara

From: Egner, Therese
Sent: Tuesday, November 4, 2025 8:22 AM
To: Kopinski, Sara
Subject: FW: Data Center Opposition

FYI

Therese Egner

Community Planner | Planning & Development - TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 420-4179 | egnert@naperville.il.us

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From: Tammy Arnold <[REDACTED]>
Sent: Monday, November 3, 2025 8:01 PM
To: Planning <Planning@naperville.il.us>; Wehrli, Scott <[REDACTED]> White, Benny <[REDACTED]> McBroom, Josh <[REDACTED]> Syed, Ashfaq <[REDACTED]> Holzauer, Ian <[REDACTED]> Jain, Supna <[REDACTED]> Kelly, Patrick <[REDACTED]> Gibson, Mary <[REDACTED]> Wilson, Nate <[REDACTED]>
Subject: Data Center Opposition

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Good evening,

I would like to voice my opposition for the proposed Data Center in Naperville. I believe it to be unnecessary, not well thought out, and the potential risks far outweigh any benefits.

Please reconsider this initiative and help preserve the precious green space that our area so desperately needs.

Regards,
Tammy Arnold



Kopinski, Sara

From: Iwicki, Brad
Sent: Tuesday, November 4, 2025 1:48 PM
To: Kopinski, Sara
Subject: FW: Proposed data center in Naperville

POD – Data Center public comment

Brad Iwicki

Assistant Planner | Planning & Development – TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 305-7021 | iwickib@naperville.il.us

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From: Sean <[REDACTED]>
Sent: Tuesday, November 4, 2025 12:55 PM
To: Planning <Planning@naperville.il.us>
Subject: Proposed data center in Naperville

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Hello!

I would like to voice my opinion on the proposed data center for Naperville.

As an individual who continues to see power and water rates go up, I am primarily concerned about the major power and water usage that is required by a data center, and those costs being passed down primarily to residents.

Additionally, while the proposal touts employment, the actual ongoing employment of a data centre is traditionally fairly low. The developer recognizes this themselves as they petition to reduce required parking. Especially since they are planning to build a smaller data center, I suspect that even those employment numbers are inflated.

I would strongly discourage the development of a data centre in Naperville on the basis of the petition. Unless there are stronger protections for the existing in terms of electricity and environmental impact.

Here is some reading from the University of Michigan that I thought was helpful.

<https://stpp.fordschool.umich.edu/sites/stpp/files/2025-07/stpp-data-centers-2025.pdf>

Regards,

Sean

Kopinski, Sara

From: Iwicki, Brad
Sent: Tuesday, November 4, 2025 1:49 PM
To: Kopinski, Sara
Subject: FW: DEV-0057-2025 : Aurora City Council | Data Center and Warehouse Moratorium

POD – Data Center public comment

Brad Iwicki

Assistant Planner | Planning & Development – TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 305-7021 | iwickib@naperville.il.us

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From: Hammy hotmail Cha <[REDACTED]>
Sent: Tuesday, November 4, 2025 1:48 PM
To: Planning <Planning@naperville.il.us>
Subject: DEV-0057-2025 : Aurora City Council | Data Center and Warehouse Moratorium

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Hello

Please consider pausing proposal for high density data center near residential homes.

As experienced by our neighbors in Aurora, IL, data center development has been challenging to residents for many reasons outlined below.

Please note the Aurora moratorium is AFTER multiple Aurora data centers projects have been completed, illustrating the need to better understand and **guarantee the flourishing of Naperville residents BEFORE high density data centers are built less than 700 feet from Naperville residential homes.**

Thank you for your service to our community.

Hamilton Cha
Lisle, IL

Data Center and Warehouse Moratorium | [aurora.il.us](https://www.aurora.il.us)

On September 25th, 2025, Aurora City Council enacted a 180-day moratorium(*PDF, see below*) on new data center and warehouse developments. This temporary pause is designed to give City staff time to:

- Research national best practices and safeguards implemented through zoning ordinances and building codes
- Study the environmental, stormwater, and utility impacts of data centers and warehouses
- Assess fiscal impacts, including long-term service and infrastructure costs
- Develop potential zoning or performance standards
- Report findings and recommendations to the Rules, Administration, and Procedure Committee, and the Building, Zoning, and Economic Development Committee within three months
- Create a definition for data centers and other special use types of warehouses if needed

...

By taking this pause, the City is:

- Creating clear rules that protect residents and businesses
- Giving developers certainty and confidence when proposing projects
- Ensuring long-term sustainability and livability for the community

Link to Aurora Moratorium announcement

<https://www.aurora.il.us/Property-and-Business/Zoning-and-Planning/Data-Center-and-Warehouse-Moratorium>

Link to PDF

<https://www.aurora.il.us/files/sharedassets/mainsite/v/1/environment/documents/o25-064.pdf>

Hamilton



Kopinski, Sara

From: Iwicki, Brad
Sent: Tuesday, November 4, 2025 4:24 PM
To: Kopinski, Sara
Subject: FW: Karis Critical Data Center - Planning and Zoning Council Meeting 11/5/25

POD – Data Center public comment

Brad Iwicki

Assistant Planner | Planning & Development – TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 305-7021 | iwickib@naperville.il.us

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From: B Benson <[REDACTED]>
Sent: Tuesday, November 4, 2025 2:38 PM
To: Planning <Planning@naperville.il.us>
Cc: Wehrli, Scott <[REDACTED]>; Gibson, Mary <[REDACTED]>; Holzhauer, Ian <[REDACTED]>; Jain, Supna <[REDACTED]>; Kelly, Patrick <[REDACTED]>; McBroom, Josh <[REDACTED]>; Syed, Ashfaq <[REDACTED]>; White, Benny <[REDACTED]>; Wilson, Nate <[REDACTED]>; Executive team <[REDACTED]>
Subject: Karis Critical Data Center - Planning and Zoning Council Meeting 11/5/25

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Hello Commissioners,

While it is encouraging that Karis updated their proposal to include a Community Stewardship Pledge and reduced the overall size of the development, NEST maintains that it is imperative for the City to pause any decision making related to data centers.

A temporary moratorium is crucial to allow the City to develop essential, robust regulatory frameworks before approving any new data center projects. This proactive approach will ensure that future developments align with the community's long-term sustainability and land use goals.

NEST urges the City to prioritize the following key areas during this pause:

- **Codify Reporting and Enforcement:** The City must establish and mandate transparent, regular public reporting of water and energy usage for all data centers. Crucially, this reporting must be backed by a clear enforcement mechanism to penalize non-compliance and ensure accountability for these resource-intensive operations.
- **Regulate Backup Power Testing:** Establish clear, mandatory schedules for generator and backup power testing. This is necessary to mitigate the noise pollution and diesel emissions that often negatively impact adjacent residential areas, ensuring a predictable and minimal disruption schedule.
- **Clarify Differentiated Zoning:** Data centers are not monolithic; their impacts vary significantly by size and cooling methods. The City must clarify zoning by establishing distinct categories based on the type of data center (e.g., small-scale server farms vs. massive hyperscale facilities). This differentiated zoning should include defining minimum distance requirements from residential neighborhoods to buffer against noise, traffic, and aesthetic impact.

To inform this critical regulatory work, the City should consult industry best practices and research. Resources like the Urban Land Institute's whitepaper on data centers and other foundational literature can provide a strong basis for developing smart, sustainable local policies.

Because we believe that this pause and putting those safeguards in place is vital, we ask the Planning and Zoning Commission to recommend not moving forward with the Karis Critical Data Center at this time.

Thank you,

Barbara Benson

--

Barbara Benson, MCP
Chair, NEST Building and Development Committee

Kopinski, Sara

From: Iwicki, Brad
Sent: Thursday, October 16, 2025 9:53 AM
To: Kopinski, Sara
Subject: FW: 1960 Lucent Lane DEV-0057-2025

POD – Data Center Public Comment

Brad Iwicki

Assistant Planner | Planning & Development – TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 305-7021 | iwickib@naperville.il.us

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From: Kally McConnell <[REDACTED]>
Sent: Wednesday, October 15, 2025 7:14 PM
To: Planning <Planning@naperville.il.us>
Subject: 1960 Lucent Lane DEV-0057-2025

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Hi there! I didn't get to the meeting tonight in time to sign in so I wanted to send my prepared comments:

I debated coming here tonight and speaking. In a world where so much feels out of control, what does it matter if one more data center is built, if one more nature preserve is disrupted by modern human life.

It almost feels inevitable.

And then the quote by the author adrienne marie brown came to me, "Small is all."

This project and its effects can seem kind of small in the grand scheme and in comparison to the atrocities that some communities and people are experiencing right now. This project can seem small in the scale of grand technological development the world is experiencing.

However, I know with or without research that it is not good for any animal, human or otherwise, to be exposed to this type of disruption. I know that we all need to experience more peace and quiet in nature and in our homes. I personally found peace at Herrick Lake when I was trying not to pull my hair out parenting during Covid. My child who runs anxious has found peace there many times throwing pebbles into the lake and running through the woods with friends. This is worth protecting. Not to mention the peace of the people who will become neighbors with this building.

If we keep making small decisions to choose to protect our earth and our peace, for us and all the other beings we share it with, nothing is inevitable.

And let this choice be a ripple to spur more and more choices to protect our planet, protect un-listened to people and communities. So I ask you please make the universally small but locally very big decision to not let this project go through. Thank you.

Kally McConnell
[REDACTED] Naperville

Kopinski, Sara

From: Iwicki, Brad
Sent: Thursday, October 16, 2025 11:31 AM
To: Kopinski, Sara
Subject: FW: Reject DEV-0057-2025

POD - Data Center comment

Brad Iwicki

Assistant Planner | Planning & Development – TED Business Group City of Naperville | 400 S. Eagle St. Naperville, IL 60540
(630) 305-7021 | iwickib@naperville.il.us

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-----Original Message-----

From: Gintas Sidrys <[REDACTED]>
Sent: Thursday, October 16, 2025 10:04 AM
To: Planning <Planning@naperville.il.us>
Subject: Reject DEV-0057-2025

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We do not want the data center in Naperville. There are way too many negatives.

Respectfully
Gintas Sidrys

Kopinski, Sara

From: Iwicki, Brad
Sent: Friday, October 17, 2025 1:40 PM
To: Kopinski, Sara
Subject: FW: Public hearing for DEV-0057-2025 Karis Critical Member, LLC - Additional Requirements

POD – Data Center Public Comment

Brad Iwicki

Assistant Planner | Planning & Development – TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 305-7021 | iwickib@naperville.il.us

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From: JD Butt <[REDACTED]>
Sent: Friday, October 17, 2025 11:48 AM
To: Planning <Planning@naperville.il.us>
Subject: Public hearing for DEV-0057-2025 Karis Critical Member, LLC - Additional Requirements

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Planning and Zoning Board and Staff,

After the meeting on Wednesday I am still very bothered that Karis did not publicly address the staff's recommendation for the "nine octave bands" in a "Additional Noise Study".

Not all noise is created equal. Even my speaker does not do justice to the noise in real life and the recording and the speaker do not reproduce all of the sound that is generated in the real world - similar to how we no longer use audio cassettes in 2025.

I believe there should be additional requirements in the "Additional Noise Study" required:

1. Re-testing of background noise over a more representative period of time (No spring break and a full week Monday through Sunday.
2. Models representing all of the generators running
3. All models should be completed assuming the Nokia building is no longer there - they do not control that property and they are currently benefiting from it providing sound screening. No one knows if that property stays or goes. I am again disappointed that the firm the city hired did not point this out and am concerned about what else they missed in their review.

These should be requirements of approval not requirements for permits. Once this facility is operational even \$500 a day in fines for noise violations will be a rounding error for the company to pay.

A Data Center being a conditional use for ORI - I think that almost all other ORI uses fit better next to data centers

There are no other ORI Permitted or Conditional uses that make noise like a modern Data center; even "7.Pilot plants" is not likely to be the scale of this.

From:

<https://naperville.legistar.com/LegislationDetail.aspx?ID=6259211&GUID=DA8CFB04-2DEA-4C24-A93F-B8C06297A65E&Options=&Search=&FullText=1>

The assumption that Data Centers are “Low Nuisance Industrial Activities” was the case 10+ years ago and in 2023 was used as justification for the staff statement for the original data centers as a conditional use.

While an extreme example - this is like comparing a metals manufacture in the mid 1800s to a metals manufacture in the 1900s. A Blacksmith vs. The US Steel Gary Indiana Plant and A farm is not a large commercial hog lot.

The technology industry changes drastically in 18 months - the industry has used Moore's law as the observation that the number of transistors in an integrated circuit (IC) doubles every 18 months. This means that things like computers and the data centers that house them can rapidly change. While data center scale had changed before 2023 since 2023 it has changed even more making this a larger problem for this site.

This clearly falls into "Site Specific Review Applicable to Conditional Uses" - **This datacenter does not fit in this ORI site. It could fit in other ORI sites that have further distance to residential properties.**

I am happy to answer questions and provide research and thoughts.

Thank You,

James Butt


Kopinski, Sara

From: Iwicki, Brad
Sent: Friday, October 17, 2025 1:40 PM
To: Kopinski, Sara
Subject: FW: DEV-0057-2025 : University of Michigan Study | WHAT HAPPENS WHEN DATA CENTERS COME TO TOWN?

POD – Data Center Public Comment

Brad Iwicki

Assistant Planner | Planning & Development – TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 305-7021 | iwickib@naperville.il.us

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From: Hammy hotmail Cha <[REDACTED]>
Sent: Friday, October 17, 2025 11:35 AM
To: Planning <Planning@naperville.il.us>
Subject: DEV-0057-2025 : University of Michigan Study | WHAT HAPPENS WHEN DATA CENTERS COME TO TOWN?

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Hello

One more follow up to the October 15 meeting discussing **Karis [High Density] Data Center proposal | DEV-0057-2025**.

Please see below summary and link to University of Michigan study (link below) analyzing data center impact to communities.

KEY FINDING

- **Increased Utility Rates:** Data centers increase local electric utility rates by driving up overall energy demand, which can strain grid capacity and force utilities to invest in costly infrastructure upgrades. These costs are passed on to residents through higher rates. Data centers have also secured long-term power agreements, which reduce the available supply and push prices up for other consumers.
- **High Resource Consumption:** A single data center can consume up to 2 megawatt hours of power—equivalent to the power used by 2,000 homes—and millions of gallons of water annually for cooling, straining local resources and infrastructure.
- **Ineffective Tax Incentives:** Tax breaks for data centers do not deliver the promised economic benefits, such as high-paying jobs, and they reduce local tax revenues, while shifting financial burdens onto communities and schools.
- **Climate and Energy Challenges:** Data centers' massive energy demands are prolonging the operation of fossil fuel plants and undermining state renewable energy goals, as seen in states like Michigan, Virginia, and Nebraska.
- **Resource Efficiency Trade-Off:** While advanced cooling methods like liquid immersion and direct-to-chip cooling offer energy efficiency improvements, current technologies force a tradeoff between energy and water efficiency, limiting sustainable solutions.
- **Policy Solutions:** To mitigate data centers' environmental impacts and align their growth with sustainability goals, policymakers should adopt model laws like the German Energy Efficiency Act, add requirements for new renewable energy, and enforce transparency through mandatory reporting.

POLICY RECOMMENDATION FOR STATES WITHOUT DATA CENTER TAX BREAKS: Do not enact data center tax breaks

For states that have not passed data center tax breaks, the most simple policy recommendation is to avoid implementing such incentives in the first place.

Legislators should refrain from passing laws that grant tax breaks to data centers, as these incentives often fail to deliver promised economic benefits and impose significant costs on state and local budgets.

Despite claims of job creation, data centers typically generate few permanent positions relative to the scale of public subsidy they receive.

The high energy consumption and environmental impact of data centers can strain local infrastructure and undermine climate goals. Redirecting public resources toward initiatives with more substantial and equitable economic returns, such as education, workforce development, or renewable energy, offers a more responsible and effective use of taxpayer dollars.

Thank you for your service and consideration.
Have a joyful weekend

Hamilton Cha
Lisle, IL

WHAT HAPPENS WHEN DATA CENTERS COME TO TOWN?

Terry Nguyen | BA Public Policy

Ben Green | Assistant Professor, School of Information and Gerald R. Ford School of Public Policy

Partner: Michigan Environmental Justice Coalition

July 2025

<https://stpp.fordschool.umich.edu/sites/stpp/files/2025-07/stpp-data-centers-2025.pdf>

Hamilton

 4 

Jesus said, "*Let the little children come to me, and do not hinder them, for the kingdom of heaven belongs to such as these.*" (Matthew 19:14)

[12,252 Palestinian children killed](#); Palestinian 8,663 children injured since October 7, 2023 (as of February 14, 2024)   

"It is difficult to get a man to understand something, when his salary depends on his not understanding it." - Upton Sinclair (author of "*The Jungle*", which exposed labor and sanitary conditions in the U.S. meatpacking industry)

Kopinski, Sara

From: Iwicki, Brad
Sent: Friday, October 17, 2025 1:40 PM
To: Kopinski, Sara
Subject: FW: DEV-0057-2025 – Public Hearing for 1960 Lucent Lane (Karis Critical Data Centers) – PZC File 25-1103C

POD – Data Center Public Comment

Brad Iwicki

Assistant Planner | Planning & Development – TED Business Group City of Naperville | 400 S. Eagle St. Naperville, IL 60540
(630) 305-7021 | iwickib@naperville.il.us

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-----Original Message-----

From: LM D <[REDACTED]>
Sent: Friday, October 17, 2025 11:17 AM
To: Planning <Planning@naperville.il.us>
Cc: Dan Johnson <[REDACTED]>
Subject: DEV-0057-2025 – Public Hearing for 1960 Lucent Lane (Karis Critical Data Centers) – PZC File 25-1103C

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Good morning,

Please consider the following, with respect to the proposed data center. Regardless of your general perspective on data centers, I am confident you can relate to the idea that people generally do not want to live next to structures that make constant noise. While that sound may fall within "nuisance limits," it is audible and constant. If you have not heard the industrial hum emitted by data centers, I urge to stop by one, so you can make an informed decision on behalf of the city that you serve.

There are hundreds of homes near this lot in naper commons, on land the PZC approved for residential development, consistent with a broader master plan that is incongruent with the data center proposal.

Please vote no for this project, in this neighborhood.

****In the interest of my family's privacy, I respectfully request redaction of my name and email address when publishing this comment****

Thank you,
Laurie Johnson

Kopinski, Sara

From: Iwicki, Brad
Sent: Friday, October 17, 2025 1:39 PM
To: Kopinski, Sara
Subject: FW: DEV-0057-2025 : BLOOMBERG article | AI Data Centers Push US Power Bills to Record Highs

POD – Data Center Public Comment

Brad Iwicki

Assistant Planner | Planning & Development – TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

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From: Hammy hotmail Cha <[REDACTED]>
Sent: Friday, October 17, 2025 11:02 AM
To: Planning <Planning@naperville.il.us>
Subject: DEV-0057-2025 : BLOOMBERG article | AI Data Centers Push US Power Bills to Record Highs

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Hello

Thank you for taking time to evaluate community value and health regarding **Karis [High Density] Data Center proposal | DEV-0057-2025**

As a follow up to the October 15 meeting regarding **increasing electricity costs due to data center development**, please see below Bloomberg video and article.

... data centers are going to consume more and more electricity. Bloomberg's NEF estimate is that by 2035, data centers will be using so much energy globally that if they were a country, they'd be fourth behind only China, the U.S. and India.

Thank you for your service and consideration.
Have a joyful weekend

Hamilton Cha
Lisle, IL

AI Data Centers Push US Power Bills to Record Highs

September 30th, 2025 | 4 minute video

The power demands from data centers are sending wholesale electricity prices to a record. At the same time, utilities are passing along the costs of new transmission lines needed for the complexes. That's adding billions to power bills at a time US consumers are already strained from higher prices of everything from food to housing – an issue that's starting to have both economic and political reverberations. Bloomberg Power reporter, Josh Saul joined Bloomberg Open Interest to talk about the story. (Source: Bloomberg)

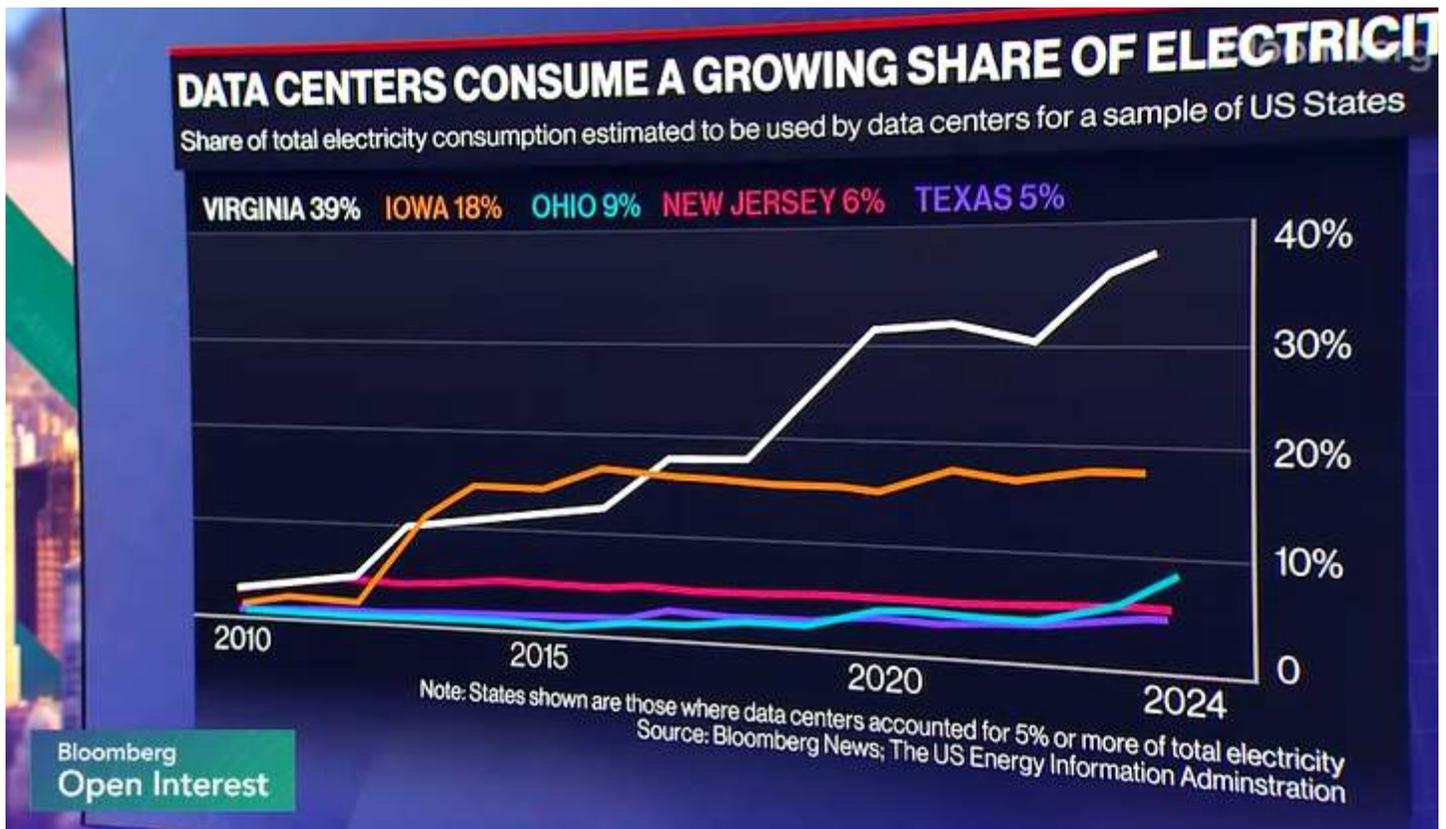
<https://www.bloomberg.com/news/videos/2025-09-30/ai-data-centers-push-us-power-bills-to-record-highs-video>

“Without mitigation, the data centers sucking up all the load is going to make things really expensive for the rest of Americans,” said David Crane, chief executive officer of Generate Capital and a former energy official in the Biden administration. All that demand risks brownout situations in some US power markets within the next year or two, he said.

“People shouldn't have to decide between their gas and electric bill and food,” he said.

“They can say this is going to help with AI, but how is that going to help me?”

Kevin Stanley sitting on his stoop in Baltimore on Sept. 10.



AI Data Centers Are Sending Power Bills Soaring

Wholesale electricity costs as much as 267% more than it did five years ago in areas near data centers. That's being passed on to customers.

By Josh Saul Leonardo Nicoletti Demetrios Pogkas Dina Bass Naureen Malik
September 29, 2025

<https://www.bloomberg.com/graphics/2025-ai-data-centers-electricity-prices/>

Data centers are proliferating in Virginia and a blind man in Baltimore is suddenly contending with sharply higher power bills.

The Maryland city is well over an hour's drive from the northern Virginia region known as Data Center Alley. But Kevin Stanley, a 57-year-old who survives on disability payments, says his energy bills are about 80% higher than they were about three years ago. "They're going up and up," he said. "You wonder, 'What is your breaking point?'"

It's an increasingly dramatic ripple effect of the AI boom as energy-hungry data centers send power costs to records in much of the US, pulling everyday households into paying for the digital economy.

The power needs of the massive complexes are rapidly driving up electricity bills — piling onto the rising prices for food, housing and other essentials already straining consumers. That's starting to have economic and political reverberations across the country as utilities and local officials wrestle over how to divvy up the costs. Yet those same facilities are a linchpin of US leadership in the global AI race.

A Bloomberg News analysis of wholesale electricity prices for tens of thousands of locations across the country reveals the effects of the AI boom on the power market with unprecedented granularity. The locations and prices were tracked and aggregated monthly by Grid Status, an energy data analytics platform. Bloomberg analyzed this data in relation to data center locations, from DC Byte, and found that electricity now costs as much as 267% more for a single month than it did five years ago in areas located near significant data center activity.

About two-thirds of the power consumed in the US runs off of a state or regional grid, where the system operator manages the trading of energy. These wholesale commodity costs are passed on to households and businesses on their utility bills, which then include other charges to maintain and expand the network. That can affect even customers who aren't in close proximity to a data center, since their energy relies on the same grid.

Every day, wholesale electricity prices are measured in real time by Locational Marginal Pricing points on the power grid, called nodes. LMPs are primarily made up of the cost to produce the energy and congestion. Analyzing data from 25,000 nodes used by seven regional transmission authorities, Bloomberg News estimated how much wholesale prices in the lower 48 states have changed since 2020.

In 2020, wholesale electricity prices around the country hovered around \$16 per megawatt-hour, on average, with slight variations from one energy market to the next.

In 2025, electricity costs depend far more on where you're located. Prices are high in many parts of the country, while some central states have negative wholesale prices, meaning more electricity is produced than consumed.

Wholesale prices more than doubled since 2020 in some markets, but the increases aren't felt equally. Many areas with the biggest jumps — like Baltimore — are near data center hot spots.

Of the nodes that recorded price increases, more than 70% are located within 50 miles of significant data center activity.

Source: Bloomberg News analysis of data provided by Grid Status and DC Byte

Note: Prices shown are the average wholesale electricity prices, based on the median prices of all the nodes within a given 100 square-mile area. To determine significant data center activity, a dynamic threshold was used that took into account the total data center capacity in the area around any given LMP node. The map displays results for the month of April, a time when grids generally don't face additional pressure from extreme weather events. For areas where the median electricity price switched from positive to negative, we considered the change as -100%. For more details, see the full methodology note.

Tech companies, now among the biggest and most powerful forces in the world, have staked their future on AI. Data centers — some with a footprint large enough to cover much of Manhattan — are chock full of racks of servers delivering computer power and storage needed to train and run models.

Their power needs are only set to accelerate. In recent weeks alone, Nvidia Corp. said it will invest as much as \$100 billion in OpenAI to support new data centers, while Microsoft Corp. struck a multiyear deal worth almost \$20 billion to get cloud computing power from Amsterdam-based Nebius Group NV using a New Jersey data center. OpenAI and Oracle Corp. forged a partnership to build 4.5 gigawatts' worth of data center capacity, enough energy to power millions of American homes.

"The reliability crisis is here now; it's not off in the distance somewhere," said Mark Christie, a former chairman of the Federal Energy Regulatory Commission who also served as a long-time Virginia regulator. He

said that load forecasts — the expected demand for power on electricity grids — are a key factor pushing up costs, driven by the data center interconnection requests.

The affordability problem extends beyond US borders. Power auction prices in Japan hit all-time highs amid government expectations of an AI boom, while Malaysia is lifting electricity rates for data centers as new facilities tighten supply. In the UK, a report from Aurora Energy Research found that higher demand from data centers could push power prices up 9% by 2040.

Globally, data centers are expected to consume more than 4% of electricity by 2035, according to BloombergNEF. Put another way: If the facilities were a country they'd rank fourth in electricity use, behind only China, the US and India.

In the US, power demand from data centers is set to double by 2035, to almost 9% of all demand, according to BNEF. Some predict it will be the biggest surge in US energy demand since air conditioning caught on in the 1960s. That comes as the grid is already struggling to update aging infrastructure and adapt to climate change.

“Without mitigation, the data centers sucking up all the load is going to make things really expensive for the rest of Americans,” said David Crane, chief executive officer of Generate Capital and a former energy official in the Biden administration. All that demand risks brownout situations in some US power markets within the next year or two, he said.

President Donald Trump, who won election in part because of Americans' dissatisfaction with higher consumer costs, said on the campaign trail that he would cut electricity prices in half within 18 months of taking office. Yet prices have only risen since his inauguration. His energy chief said this month that soaring power bills are now his biggest concern.

The president has championed America's AI dominance while also stripping support for new sources of energy like solar and wind farms with his One Big Beautiful Bill Act, which some experts say will increase average household energy bills. BNEF forecasts that annual deployment of new solar, wind and energy storage facilities in 2035 will be 23% lower than it would have been without the bill.

Trump has instead focused on unlocking power through expanding the use of coal, natural gas and nuclear energy. In a statement, White House spokeswoman Taylor Rogers blamed the Biden administration's climate agenda and “destructive” policies for driving up energy prices.

“President Trump's actions to unleash American energy are the only reason our country has not experienced blackouts and grid failures that would have occurred” under the prior policies, she said.

“They can say this is going to help with AI, but how is that going to help me?”

Kevin Stanley sitting on his stoop in Baltimore on Sept. 10.

PJM Interconnection, the operator of the largest US electric grid, has faced significant strain from the AI boom. The rapid development of data centers relying on the system raised costs for consumers from Illinois to Washington, DC, by more than \$9.3 billion for the 12 months starting in June, according to the grid's independent market monitor. Costs will go up even more next year.

Demand tied to the cryptocurrency boom, new factories and the electrification of the economy, including vehicles and home heating, are also pushing up power bills. The cost of natural gas, the No. 1 power-plant fuel

in the US, is increasing thanks to all of this demand. And in the zone that includes Baltimore, the planned retirement of coal plants has increased the price of power by decreasing projected supply.

Baltimore residents saw their average bill jump by more than \$17 a month after a power auction held by PJM reached a record high, according to Exelon Corp.'s Baltimore Gas & Electric utility. This year's auction set another record, which will boost the average power bill in Baltimore again by up to \$4 starting in mid-2026.

There has been a "massive outcry about high energy bills" in the area, said David Lapp of the Maryland Office of People's Counsel, an independent state agency that advocates for residential utility customers. His office fields about 50 calls a week and recently hired a new staffer to help manage the requests for help. A comic strip taped to his office door makes a dark joke about AI causing the power grid to collapse.

Nicole Pastore, who has lived in her large stone home near Baltimore's Johns Hopkins University campus for 18 years, said her utility bills over the past year jumped by 50%. "You look at that and think, 'Oh my god,'" she said. She has now become the kind of mom who walks around her home turning off lights and unplugging her daughter's cellphone chargers.

And because Pastore is a judge who rules on rental disputes in Baltimore City District Court, she regularly sees poor people struggling with their own power bills. "It's utilities versus rent," she said. "They want to stay in their home, but they also want to keep their lights on."

Stanley's neighborhood is a mix of well-tended houses like his and those that are condemned or abandoned, with broken windows and holes in the walls. He used to work as a hotel manager but glaucoma took his vision almost 20 years ago, leaving him with few employment options.

"They can say this is going to help with AI, but how is that going to help me?" he said from his front steps. "How's that going to help me pay my bill?"

|
The analysis of 25,000 LMP nodes examined the relationship between the change in wholesale electricity prices and the nodes' distance from data centers. LMP nodes with increases are more likely to be concentrated near data centers, the analysis shows.

The increased demand on the grid from data centers is creating upward pressure on customer bills, according to Grid Status co-founder Connor Waldoch.

Electricity Price Increases Are Concentrated Near Data Centers

Distance from significant data center activity for LMP nodes and change in the median wholesale electricity prices from 2020 to 2025

Source: Bloomberg News analysis of data provided by Grid Status and DC Byte

Note: The analysis includes a small number of nodes in Canada used by US RTOs. Median distances rounded to the nearest whole number. To determine significant data center activity, a dynamic threshold was used that took into account the total data center capacity in the area around any given LMP node. For more details, see the full methodology note.

The boom highlights a stark trade-off: Data centers devour electricity and water, but also are required for the tech-driven conveniences of the modern era, whether it's using ChatGPT for queries, getting matched with an

Uber driver or seeing streaming recommendations on Netflix. Even some activists who protest widespread development of the facilities acknowledge that their digital lives rely on them.

In 2024, the three biggest US cloud providers — Amazon.com Inc., Microsoft and Alphabet Inc.'s Google — spent more than \$200 billion on capital expenditures, most of it to construct data centers. To ease the pressure, tech companies are working on ways to speed additional power capacity to the grid while developing better techniques for cooling data centers and chips that use less energy. Hyperscalers are collectively bringing back old reactors, spurring upgrades at existing plants and investing in next-generation nuclear power.

In some US regions it's clear that data centers are a major influence on the surge in energy costs. They are the largest source of new power consumption in Texas by far. Dominion Energy Inc. — which serves northern Virginia's Data Center Alley — forecast that its peak demand would rise by more than 75% by 2039 with data centers. It would be just 10% without. Against that backdrop, power costs have become a key issue in this year's gubernatorial elections in Virginia and New Jersey.

Utilities across the US say they are trying to ensure tech firms pay a fair share for the electricity and infrastructure upgrades their data centers require. Some power companies have moved to require tech firms to put up more collateral or pay for specific amounts of electricity, even if they end up using less.

Data centers in various stages of construction in Ashburn, Virginia on Sept. 10.

"We believe data centers should pay for the full cost of their power," Dominion spokesperson Aaron Ruby said in an email. "That's how we design our rates, and it's the standard our regulator uses in reviewing them." Ruby added that infrastructure costs are allocated based on how much it costs to serve each group of customers, with data centers paying an increasingly large percentage of transmission costs.

Calvin Butler, the CEO of Exelon, said the company is pushing for long-term solutions that are fair and bring peace of mind to customers. "While we can't control every factor driving up prices, we refuse to stand by," he said in a statement.

For local officials, the effects are becoming urgent. Last week, Pennsylvania Governor Josh Shapiro convened the first-ever meeting of representatives from all 13 states served by PJM. Shapiro, a Democrat, warned that if PJM didn't tackle changes to reign in consumer costs, Pennsylvania could withdraw from the system. New Jersey regulators are studying this and Maryland may do the same, underscoring growing discontent among the three original states that made up the P, J and M grid.

PJM has said that supply and demand conditions are driving up prices. A spokesman declined to comment further.

As a regional grid operator, PJM not only runs daily markets to trade electricity but is also responsible for transmission planning, and costs for those projects are socialized within the grid. It approved \$5.9 billion in new transmission projects in February, attributing the load growth primarily to data centers. PJM also runs a capacity auction to contract to procure power supplies where consumers pay billions of dollars a year to generators to ensure they are available.

“The PJM capacity market will be at its maximum price for the foreseeable future, it could be five or 10 years,” said Joe Bowring, president of Monitoring Analytics, the grid’s official watchdog. He said data centers need to bring their own generation, and those projects should get a speedy approval process.

Data Centers Consume a Growing Share of Electricity

Some local governments are now rethinking how utility costs are shared and who should pay. In Oregon, lawmakers in June passed the POWER Act, a law designed to help utilities strike fairer deals with data centers and crypto miners.

The issue is especially pronounced in the Portland suburb of Hillsboro, where 15 major data centers are located. Nearly all of Portland General Electric’s load growth has come from commercial customers, said Bob Jenks, executive director of the Oregon Citizens’ Utility Board. Yet over the past decade, residential rates climbed by 8 cents per kilowatt-hour, compared with just 2 cents for large users, he said. Rising home power costs contributed to a wave of electricity shutoffs during a frigid winter last year.

Portland General said there are numerous factors in rate increases. The utility is hoping to have new rates based on the POWER Act for the commission to approve next year “to keep prices as low as possible for our residential and small business customers while supporting growth of data centers as they continue to come online,” said John McFarland, vice president and chief commercial and customer officer.

The POWER Act was designed to give regulators sharper tools to hold large electricity users accountable, said State Representative Pam Marsh, who introduced the bill. She noted that Amazon was collaborative on the legislation, though it ultimately withheld final support. Google did as well.

An Amazon spokesperson said the company works closely with utilities and grid operators to plan for future growth. When special infrastructure is needed, “we work to make sure that we’re covering those costs and that they aren’t being passed on to other ratepayers,” the spokesperson said.

Google supports paying its fair share for electricity to data centers and helping to protect other rate payers, according to a spokesperson. The company said it has been working to use less electricity even as it expands data centers, with Google’s operations delivering more than six times more computing power per unit of electricity than they did five years ago.

A similar debate is underway in the political battleground state of Wisconsin, where Microsoft is developing a massive data center on land once meant to be a plant for Foxconn, until the iPhone supplier dramatically scaled back its highly touted plans. Local residents are already paying higher bills tied to power lines built for Foxconn, according to Tom Content, executive director of the state’s Citizens Utility Board.

Now, with Microsoft’s site requiring 900 megawatts — and an even larger 1.3-gigawatt facility that could go up to 3.5 gigawatts approved for construction farther north — utility We Energies and its parent company told investors it will need to boost its power capacity by about 20% through 2029. The utility, which plans investments to bring 6 gigawatts of new generation online in that time period, has proposed tariffs that force “very large” customers to shoulder the costs of infrastructure built for them, even if they later give up on the project.

Microsoft says it collaborated with the utility in structuring the proposed tariffs.

“We recognize that it’s literally our responsibility to make sure that when we come to a community, when we get connected to a grid, that the cost of the infrastructure that is being dedicated to us, that those costs of service, get allocated to us,” said Bobby Hollis, Microsoft’s vice president of energy.

Still, Milwaukee resident Montre Moore, first vice president at the county chapter of the NAACP, is worried about the impact of future rising prices on the area’s poor and communities of color. His own home heating bill rose from around \$118 a month to \$160 last winter, and he expects another hike this year. “We are in for a world of hurt that is coming from a rate perspective and from an environmental perspective,” he said.

We, in a statement, said its typical bills are in line with other Midwest utilities, and that its most recent rate approved by regulators wasn’t tied to data centers and instead was related to issues including programs for severe weather and costs from previous projects.

|
In northern Virginia, Dominion Energy cited data center demand, inflation and higher fuel costs when asking regulators to raise its customer bills by about \$20 a month for the average residential user over the next two years. Customers wrote Dominion’s regulators to complain.

One woman from Hampton said she’s an 81-year-old widow with limited income and can’t afford the increase. Another from Virginia Beach said she and her husband are already living paycheck to paycheck. A man in Midlothian said data centers shouldn’t push up bills if they’re not paying their fair share.

Mary Ruffine was shocked to see her monthly bill increase to around \$260 from roughly \$200. She lives in Arlington, Virginia, an affluent Washington suburb with tree-lined streets shading homes. Her monthly bill increases don’t mean she has to skimp on medication or skip meals. But she doesn’t like that poorer people are shouldering higher bills while some of the richest companies in the world profit.

“I just feel like we are sharing the burden in an uneven way with these corporations that have billions of dollars,” she said. “And so we the people are the ones who are absorbing the costs for these data centers.”

Back in Baltimore, Antoinette Robinson leaned on her walker during a recent afternoon stroll to complain that her high power bills leave her with less than \$100 in her bank account at the end of each month. “It’s killing my pockets,” she said.

Stanley says the trees that used to grow on his street were cut down. Without their shade his home gets even hotter in the summer, forcing him to rely more on expensive air conditioning.

The rise in his power bills has him reusing disposable razors 20 times and stretching the supplies for his diabetes and sleep apnea. Sometimes he goes to food banks.

“People shouldn’t have to decide between their gas and electric bill and food,” he said.

Change in electricity prices

To examine the impact of data centers on power grids, we first analyzed monthly electricity prices for so-called Locational Marginal Pricing (LMP) nodes that were aggregated from real-time data by Grid Status, for

the seven Regional Transmission Organizations (RTO) where wholesale electricity markets operate in the US. Some areas of the country do not participate in these markets and were not included in the analysis.

LMP nodes are points in a power grid, including substations, power generation facilities and connections between transmission lines, where wholesale electricity is being auctioned off, either in real time or for the day ahead. The analysis only included nodes that had electricity-price data for both 2020 and 2025, as well as a known location, also provided by Grid Status, so that distance from data centers could be measured. In total, our analysis captured about 25,000 nodes.

For each node, Grid Status calculated monthly median electricity prices recorded at five-minute intervals, and we calculated the differences between the medians for the months of April 2020 and April 2025. We focused on the month of April because US grids generally don't face additional pressure from extreme weather during that month, like they tend to do during winter and summer months. We replicated the analysis for the months of January and July to confirm that the same pattern held true: the median distance from significant data center activity is shorter for nodes that recorded the highest price increases.

Change in the median wholesale electricity price

Wholesale electricity prices can be positive or negative. Negative prices generally occur when the supply of electricity is greater than the demand. We considered nodes where prices switched from positive in 2020 to negative in 2025 to have recorded a decrease in prices. Conversely, we considered prices that switched from negative to positive as having increased.

Distance from data centers

Next, we determined each LMP node's proximity to significant data center activity using data from DCByte. To define what constitutes significant activity, we used a dynamic threshold of data center live capacity around each node after speaking with power-modeling experts, who indicated the price impact of a data center on a given node varies depending on how much capacity is already operating in the area. To calculate the level of data center activity, we first divided the US into grid cells using H3, a well-established geospatial indexing system, at resolution 4 to create equal-sized areas that cover about 683 square miles. We then calculated the total live capacity within that area as of July 2025, and the distance of each node from 20% of that total capacity.

For the purposes of mapping the data, we split the country into hexagonal cells of 100 square miles each. Only cells where LMP nodes exist are shown. For each cell, we calculated the average wholesale electricity price for April of each year between 2020 and 2025, based on the median prices of all nodes included in the cell. For areas where the electricity price switched from positive to negative, we considered the change as -100%. Cells deemed as being far from data centers were ones in which the LMP nodes had an average distance greater than 50 miles from significant data center activity.

Electricity consumption by state

To estimate data centers' share of a state's electricity consumption, we adjusted the total live capacity of data centers in each state to account for utilization and energy efficiency. We converted the capacity values to energy consumption estimates using the following formula: $MWh = (\text{capacity}) (\text{hours in a year}) (\text{utilization rate}) * (\text{Power Usage Effectiveness})$ where capacity is the installed IT capacity, utilization rate is 70% and Power Usage Effectiveness (PUE) is equal to an average of 1.5.

The calculation assumes that data centers are running 70% of the time and that their PUE — a ratio to determine a data center's efficiency — is 1.5 on average. These numbers can vary from facility to facility. Bloomberg had energy experts review these calculations.

Hamilton

 4 

Jesus said, "*Let the little children come to me, and do not hinder them, for the kingdom of heaven belongs to such as these.*" (Matthew 19:14)

[12,252 Palestinian children killed](#); Palestinian 8,663 children injured since October 7, 2023 (as of February 14, 2024)   

"It is difficult to get a man to understand something, when his salary depends on his not understanding it." - Upton Sinclair (author of "*The Jungle*", which exposed labor and sanitary conditions in the U.S. meatpacking industry)

Kopinski, Sara

From: Iwicki, Brad
Sent: Friday, October 17, 2025 1:39 PM
To: Kopinski, Sara
Subject: FW: Data center

POD - Data Center public comment

Brad Iwicki

Assistant Planner | Planning & Development – TED Business Group City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 305-7021 | iwickib@naperville.il.us

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-----Original Message-----

From: Jason Ezerski <[REDACTED]>
Sent: Friday, October 17, 2025 10:49 AM
To: Planning <Planning@naperville.il.us>
Subject: Data center

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Hello. I would like to voice my concerns about the proposed data center in Naperville. People who live in cities with data centers end up paying higher utility rates to subsidize the data centers. They require massive amounts of power and water to keep them running and are not good for the environment. The people of Naperville should not subsidize businesses who will be making a lot of money, not to mention the environmental factors, and infrastructure demands.

Thank you,
Jason Ezerski

Kopinski, Sara

From: Egner, Therese
Sent: Thursday, October 16, 2025 4:03 PM
To: Kopinski, Sara
Subject: FW: Please vote NO on the Karis Data Center

FYI!

Therese Egner

Community Planner | Planning & Development - TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 420-4179 | egnert@naperville.il.us

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From: AMGalo <[REDACTED]>
Sent: Thursday, October 16, 2025 12:34 PM
To: Planning <Planning@naperville.il.us>
Subject: Please vote NO on the Karis Data Center

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Greetings,

I am writing to implore the Planning and Zoning Commission to reject the Karis Data Center and to agree to a 6 month moratorium on Data Centers.

We are in no rush here. The citizens of Naperville are not currently, in any way, suffering from existing data sources. We are not clamoring for more data, we are not begging for faster connections. Those of us who work from home have not petitioned for more.

The push for more data centers is being driven by large tech firms pushing their AI-enabled tech which frankly, no one has been begging for. Do a few quick searches and you can see the rising backlash against generative AI. And frankly, we don't need to build a data center to fuel inaccurate Google results summaries and chatGPT-produced school reports.

Let's please take a moment to pause, do some serious evaluation of the actual needs of Naperville citizens and have third party experts forecast the long-term costs and impact of these centers.

Naperville is the incredible place that it is due to the deliberate and choiceful planning decisions over decades. I implore you to continue that tradition and vote NO on Karis and create a minimum 6-month moratorium on data centers.

Kind regards,
Andrea McGovern Galo

Kopinski, Sara

From: Iwicki, Brad
Sent: Wednesday, October 15, 2025 1:18 PM
To: Kopinski, Sara
Subject: FW: Comment on DEV-0057-2025

Categories: Blue Category

POD – Data Center Public Comment

Brad Iwicki

Assistant Planner | Planning & Development – TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 305-7021 | iwickib@naperville.il.us

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From: Catherine Lill <[REDACTED]>
Sent: Wednesday, October 15, 2025 1:09 PM
To: Planning <Planning@naperville.il.us>
Subject: Comment on DEV-0057-2025

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Hello!

I'm a Naperville resident and I just wanted to express my disappointment in this data center proposal and the fact that it hasn't been stopped yet.

There are numerous reasons why this data center should not move forward. I have yet to see a community that has made a deal to build a data center and not regretted it. No amount of money is worth the impacts this will have on our community in the future.

This is Naperville! We can and we must do better!

Let's stop this now before it becomes a bigger problem we do not want data centers built here!

Thanks,

Catherine Lill



Kopinski, Sara

From: Iwicki, Brad
Sent: Tuesday, October 21, 2025 11:52 AM
To: Kopinski, Sara
Subject: FW: Vote NO to Karis Data Center!

POD – Data Center Public Comment 10/21

Brad Iwicki

Assistant Planner | Planning & Development – TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 305-7021 | iwickib@naperville.il.us

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From: Daniel Galo <[REDACTED]>
Sent: Tuesday, October 21, 2025 7:50 AM
To: Planning <Planning@naperville.il.us>
Subject: Vote NO to Karis Data Center!

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Hello,

I am writing to urge you all to vote NO to the proposal for a data center in Naperville.

These data centers are an enormous strain on resources where they have been built, and we do not need to put our water and energy resources at risk. Especially over something (the growth of ai) that has potentially negative repercussions for society as a whole.

Naperville does not need it and should not support it.

Please see the recent timely article in the October 20 New York Times about how these data centers strain their local communities.

<https://www.nytimes.com/2025/10/20/technology/ai-data-center-backlash-mexico-ireland.html?smid=nytcore-ios-share&referringSource=articleShare>

These data centers would only strain resources and increase costs for Naperville residents.

I strongly urge you to vote NO!

Regards,

Daniel Galo
Naperville resident since 2009

From Mexico to Ireland, Fury Mounts Over a Global A.I. Frenzy

As tech companies build data centers worldwide to advance artificial intelligence, vulnerable communities have been hit by blackouts and water shortages.



By Paul Mozur, Adam Satariano and Emiliano Rodríguez Mega

Paul Mozur reported from Santiago, Chile, and Querétaro, Mexico. Adam Satariano reported from Ennis, Ireland, and Querétaro. Emiliano Rodríguez Mega reported from Querétaro.

Kopinski, Sara

From: Egner, Therese
Sent: Monday, October 27, 2025 8:44 AM
To: Kopinski, Sara
Subject: FW: DEV-0057-2025 – Public Hearing for 1960 Lucent Lane (Karis Critical Data Centers) – PZC File 25-1103C

FY I- DEV-0057-2025

Therese Egner

Community Planner | Planning & Development - TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 420-4179 | egnert@naperville.il.us

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From: Rachel Alexander <r[REDACTED]>
Sent: Saturday, October 25, 2025 1:06 PM
To: Planning <Planning@naperville.il.us>
Subject: DEV-0057-2025 – Public Hearing for 1960 Lucent Lane (Karis Critical Data Centers) – PZC File 25-1103C

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Hello! I am a Naper Commons resident and have resided in Naperville for 20 years. I am not in favor of having a data center so close to our homes. I have watched the videos of previous meetings and one thing I have not heard mentioned yet is the proximity to a Naperville Park District park. Naper Commons is centered around a park district park and is a VERY active playground daily. As this area has been developed into residential I think it is time to reconsider what the zoning surrounding our homes will be.

We love our home, we love our neighborhood — which is filled with young families, and I would appreciate not having to worry about the health affects the data center would have on my family.

As a mother with millennial anxiety, I do not need more reason to feel anxious about noise, pollution, and health risks AT MY HOME.

Thank you kindly,

Rachel Alexander



Kopinski, Sara

From: Iwicki, Brad
Sent: Tuesday, October 28, 2025 2:58 PM
To: Kopinski, Sara
Subject: FW: Public Comment on DEV-0057-2025 (Karis Data Center) – Comprehensive Community Summary & Questions

FYI – POD Data Center Public Comment

Brad Iwicki

Assistant Planner | Planning & Development – TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 305-7021 | iwickib@naperville.il.us

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From: Naperville Now [REDACTED]
Sent: Tuesday, October 28, 2025 2:02 PM
To: Planning <Planning@naperville.il.us>
Subject: Public Comment on DEV-0057-2025 (Karis Data Center) – Comprehensive Community Summary & Questions

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Hi Planning & Zoning Team,

Thanks for the time and patience you've shown through this process. Residents know how much information you have to balance before the November 5 meeting, and we wanted to share what we've gathered from the community.

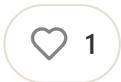
Should Naperville Support Data Centers?

An Honest Guide to Data Centers (the good, the bad, and what no one is telling you.)



NAPERVILLE NOW

OCT 16, 2025



Share

Naperville dreams big. It always has.

But dreams change, like that massive Alcatel-Lucent campus off Lucent Lane near I-88. Remember when Nokia was king, and tech workers flocked daily to that sprawling site?

Those days are gone, and we're left wondering: what's next for our beloved city (a.k.a. [the number one city in America](#))?

Now, Naperville faces a new crossroads: the proposal from Karis Critical to build two significant data centers totaling approximately 422,500 sq ft on the 40-acre vacant land. But are data centers truly beneficial for Naperville?



Smith, K. (2025, August 5). *Data center could land at former Alcatel-Lucent site in Naperville*. Daily Herald. Retrieved from <https://www.dailyherald.com/20250805/news/data-center-could-land-at-former-alcatel-lucent-site-in-naperville/>

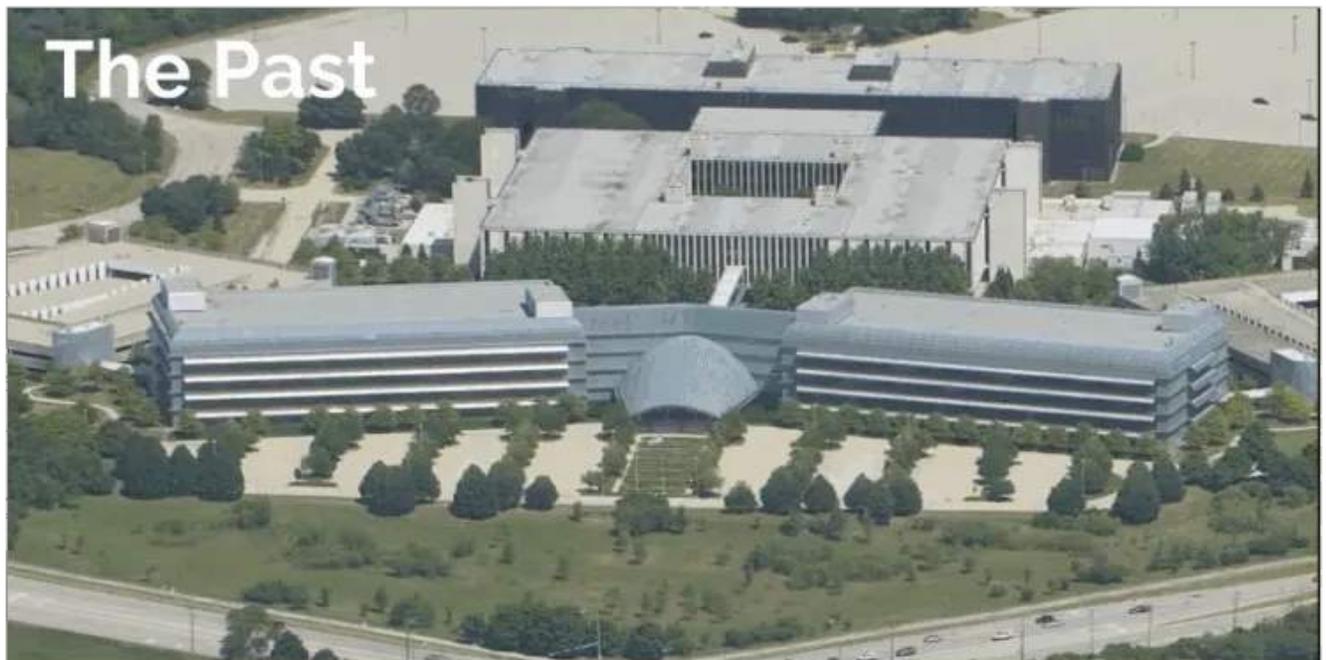
Let's explain everything you need to know.

What's Going On?

Karis Critical plans to utilize the site's existing infrastructure—fiber-optic cables leftover from Lucent—to build what they describe as a “metro” data center for banks, insurers, and other local businesses.

Each building would house up to **36 megawatts of IT load**, totaling **72 megawatts** across the two facilities. Phase 1 construction would begin soon with Phase 2 dependent on future electrical infrastructure. To put that in perspective, 72 megawatts is roughly enough electricity to power more than 50,000 homes at once—about the size of a small city.

UPDATE: “Now, Karis is seeking approval for only phase one of its plan: singular 36-megawatt data center building on the 40-acre property. Similar to the original plan, the building will contain an office component. There will be 24 backup generators as part of the new proposal, with each generator acoustically treated in a self-contained unit.”¹



Karis Critical Member, LLC. *Community Stewardship Pledge*. Naperville Data Center, <https://napervilledatacenter.com/community-stewardship-pledge/>.

Why Naperville?

Naperville has a city-owned electric utility, a stable water supply, and a prime location along the tech corridor. The site is already zoned for office/research/industrial use (ORI), and data centers are allowed there with a special permit.

So from a zoning perspective, it fits—the developer just needs a conditional use permit and a couple variances (like fewer parking spots since data centers don't need hundreds of parking spaces, and taller screening walls/fences for equipment).

Naperville's staff actually recommended approving Phase 1 (with conditions) because the existing grid and utilities can handle one building for now. They want the developer to come back for separate approval of Phase 2 later, once there's proof that enough electrical power is available and any Phase 1 issues are resolved.

Naperville is an attractive location, but the city is being cautious and doing homework before fully green-lighting both phases.

Now, **are data centers good or bad for the city?** It's not a simple black-or-white answer.

There are some **real benefits** and some **serious concerns**.

Let's break down the pros and cons.

The Benefits Clearly Explained

1. Tax Revenue (Property Taxes & More)

A data center would add a **big property to the tax rolls**, which can bring in revenue for the city, schools, and other taxing bodies. Right now that land is vacant, generating minimal tax. If the data center gets built, the **estimated total property value** (for tax purposes) is about **\$63 million** (with an assessed value around \$21 million) once both buildings are up. That could yield roughly **\$1.5 million per year in property taxes** spread across all local governments. The **school district (Naperville CUSD 203)** would get the largest chunk (on order of ~\$1 million a year) without having to add any new students (data centers don't send kids to school)³. The **City of Naperville's direct share** of property tax might be only around **\$90,000 a year at full build-out**⁴ (the city tax rate is smaller since schools, county, etc., take most of the levy). So it's not a game-changer by itself for city property taxes. Don't expect your personal property tax bill to suddenly drop a ton. **However**, every bit helps: that's \$90,000 the city can use for services or to offset tax increases, and about a million dollars easing the burden on schools (which *could* indirectly slow down future tax hikes for homeowners).

On top of property tax, Naperville has an **electric utility tax** (basically a city tax on electricity usage). The data center would be an electricity-hungry customer, so it would pay a **significant amount in electric utility taxes/fees**. In fact, a fiscal study for the city estimated **Naperville would collect around \$1.9 to \$3.1 million per year just from electric utility taxes once the data center is fully running**⁵. This range depends on how much of the capacity is actually used (it might ramp up over time – the more servers running, the more power drawn, the more tax paid). To put that in perspective, \$2–3 million annually is a pretty solid revenue stream – much bigger than the city's

cut of the property tax. That money could potentially be used to improve infrastructure or even help the city keep residential electric rates stable. **Bottom line on taxes:** A big data center adds to the tax base and brings in revenue **without needing a lot of city services in return** (no kids in school, minimal daily traffic, etc.). So it *could* help *a little* to spread out the tax burden and fund local government – it’s not a windfall that lets everyone off the hook but it’s beneficial. One resident asked us on [Instagram](#) “could it lower my property taxes?”

The honest answer: **maybe slightly, indirectly**. It gives the city and others more revenue, which in theory could reduce the need to raise taxes as much in the future. But it’s not likely to slash your bill dramatically. Think of it more like *helping keep taxes from rising faster* rather than actually cutting them overnight.

2. Utility & Infrastructure Benefits

Naperville’s own **Electric Utility** stands to gain from a large customer if it’s structured right. The city would sell a huge amount of power to the data center. As long as the rates cover all the costs, the utility can earn a **contribution margin** (profit) on that sale, which can benefit all customers. Ideally, the data center’s electric bills (likely millions of dollars per year) would include not just the cost of the power but also money that helps maintain the grid. If done properly, **other residents’ rates wouldn’t go up – they might even see improvements** because the utility has more revenue to spread fixed costs (For example, maintaining transformers and lines costs the same, but now there’s a new user helping pay for it.) In Naperville’s case, there is some caution here: the city is currently negotiating its wholesale power supply contract for the coming years. The data center would increase the city’s total electricity usage by an estimated **44%**, which is huge. If the city locks in power

purchase agreements without accounting for this, or if this large load changes their cost structure, there's a risk other customers could be affected. That's why the city's sustainability task force (NEST) is asking for a pause – they want to make sure Naperville figures out the **cost implications on the grid and rates** before saying yes.

But if managed well, the data center could basically pay its own way for any grid upgrades. In fact, Naperville is already planning that: the **Phase 1 building can plug into existing substations** (capacity is “sufficient” for one 36MW facility)⁶, but **Phase 2 will require a new substation** and more infrastructure. The developer is aware of this – they even requested a variance to build a private on-site electrical substation in the future (with an 8-foot security fence) as part of the plan⁷. It's expected **Karis (the developer) will fund those power infrastructure upgrades for Phase 2**, or at least share costs, rather than dumping it on the city. If that happens, Naperville's grid gets an upgrade that could also improve reliability or capacity for others, at minimal city expense.

Similarly on the **water infrastructure** side: Naperville gets its water from Lake Michigan (via the DuPage Water Commission pipeline). The data center will need water if it uses **water-cooled chillers or cooling towers** (likely, for efficient cooling of servers). That means more water sold by the city's water utility – which again is revenue. Karis hasn't publicly stated exact gallons, which has some folks concerned (lack of info), but they **claim the data center water use will actually be lower than what the old Lucent office campus used to consume**⁸. (The previous 600,000 sq ft building had thousands of employees – lots of bathrooms, AC cooling, cafeteria, etc., so it did use quite a bit of water when it was operational.) If true, that suggests the water impact might not be as crazy as it sounds. In any case, Naperville already has the water capacity for a large commercial user, and they could always require t

data center to use water-efficient technology or even recycled water if available. So, from a utility standpoint: The data center would pay for a **lot of electricity and water**, and those payments (bills, utility taxes) can benefit the community **if managed correctly**. It's a *financial positive* for city utilities, as long as we mitigate the risk of any cost spillover to residents.



Chicago Tribune. (2025, October 14). Artist's rendering of the proposed Karis Critical data center campus at 1960 Lucent Lane, Naperville [Image]. In Karis Critical scales back proposed data center in Naperville. Retrieved from <https://www.chicagotribune.com/2025/10/14/karis-critical-scales-back-proposed-data-center-in-naperville>

3. Jobs and Economic Activity

During **construction**, a project like this (probably \$250+ million investment) would create a lot of construction jobs for a couple years – hundreds of workers (electricians, engineers, trades) will be employed to build the facility and that brings payroll and spending to the area. Some of that money flows to local businesses (restaurants, suppliers, etc.). **After it's built**, data centers don't employ a ton of people compared to factories or offices, but there will

still be some **permanent jobs**: facility technicians, engineers, security staff, maintenance, etc. Maybe on the order of **20–50 full-time jobs** per building (just an estimate from typical data centers). Not huge, but these are often **well-paying technical jobs**. And if it's a multi-tenant data center, clients will visit and maybe local IT consultants or electricians get contracts for ongoing work. There's also a hope that having a data center can attract **ancillary businesses** – like telecom companies, fiber providers, or other tech companies that want to be nearby (to connect to the data center or because Naperville shows it's "tech-friendly"). It can be part of a **tech ecosystem**. For example, if banks and insurers colocate servers there, those companies might do more business in town or sponsor local programs. So there's an economic development angle: Naperville being seen as part of the "digital infrastructure backbone" could be a selling point for other high-tech or finance firms. Last, some proponents say data centers are basically the "**roads and bridges of the digital age**,"⁹ meaning it's essential infrastructure (like having highways or rail).

Having one can be a point of pride or at least a sign that Naperville is keeping up with modern needs.

4. Low Traffic & Little Strain on Services

Unlike a factory or office park, a data center won't flood the roads with traffic every day. Once built, it's mostly just a few employees and maybe occasional deliveries. No daily commuter rush, no fleets of trucks (aside from maybe the odd equipment delivery).

So **traffic impact is minimal**. Probably far less than if that 40-acre site became, say, a warehouse or a shopping center. It also doesn't generate a lot of calls for police or fire (except maybe for the rare incident or fire alarm – though the fire department will need to be prepared for high-power electrical

fires, etc., but those are rare). No school impact as mentioned, and minimal wear on city services. So from a **community services** perspective, it's a net-positive taxpayer: it pays in money but doesn't use much city resources day to-day.

5. Productive Use of Land (vs. Alternatives)

That site is currently empty after the old building was demolished in 2023. Not a data center, what else could go there? Possibly an office campus again (but let's face it, office demand is not great these days), or a warehouse, or maybe a mix of retail/housing (though currently it's zoned for office/industrial, so housing would need a rezone and isn't in the plan). **A data center is a way to revitalize that dormant property** with a modern use. It keeps the land in an **"economic" use (business)** which can be better for city finances than non-profit or residential uses. It's also **consistent with the area's character to some extent** – that I-88 corridor is full of corporate campuses, research facilities, and yes, some data centers in nearby towns. In fact, the developer's attorney pointed out that this site has had high-tech telecom research for decades (Bell Labs/AT&T -> Lucent -> Nokia), so a data center is "absolutely consistent" with that history ¹⁰.

In other words, it's not a random factory plopped in a residential zone; it's in a corridor that's long been meant for tech and industry. Supporters argue it's better to have this than to leave the land vacant or see it turn into something like a trucking warehouse which might bring noise and diesel trucks of a different kind.

Upsides...

Those are the main *upsides*: more tax revenue (especially electric taxes) that could help the city and schools, a boon to the city's utility income, some job

and economic spin-off, not much traffic or service burden, and productive use of an appropriate site.

Now, let's look at the **downsides and concerns**, because there are plenty be raised by local residents and even the city's sustainability experts.

The Concerns and Downsides (Cons)

1. Huge Energy Consumption (Grid Strain & Emissions)

Data centers use *massive* amounts of electricity. As mentioned, at full build this one would draw up to 72 MW nonstop – that's like adding nearly half of Naperville's current entire power demand ¹¹. Neighbors and sustainability fc worry what that means for **grid reliability and cost**. Will the data center ho all the power and cause shortages or blackouts? (Probably not literally, sinc Naperville will upgrade infrastructure and buy more power – they won't cu off your AC to feed the servers. But it's a *lot* of load on the system.) The concern is more about **cost sharing**: if Naperville has to buy a ton more electricity on the market for this one customer, will it drive up prices? The city needs to ensure the data center pays its full way. Naperville's Environment and Sustainability Task Force (NEST) noted that because the city's power supply contracts are being negotiated now, it's impossible to fi know how this big addition will affect **electric rates for everyone** ¹². They w a pause until that analysis is done, to avoid a scenario where residents' bills up due to the data center ¹³.

Another angle: **Emissions and climate impact**. Naperville doesn't generate i own electricity; it buys from the grid (likely from a mix of sources). A significant portion of Illinois' grid power (especially what Naperville buys) s comes from fossil fuels like coal and natural gas ¹⁴.

If the data center draws, say, 630,000 megawatt-hours a year (which is roughly the estimate), and a lot of that is from coal plants, that's a **huge carbon footprint and more air pollution** indirectly. NEST pointed out it wo **significantly increase Naperville's overall greenhouse gas emissions** unless the data center's load is met with clean energy ¹⁵. They suggest maybe requiring the data center to invest in renewables or adjust the city's power purchase to cover it with green power. Without such measures, approving a facility could run counter to climate sustainability goals (basically, it's like putting an **electric "factory"** online that runs 24/7). So, big picture: lots of electricity use = potential grid stress and higher emissions.

It's a trade-off: the city can gain revenue from selling electricity, but it has to be very careful not to let that big usage negatively impact everyone else's rates or the environment.

Here's one example of how it's happening to a lot of people across the country:

We Found the Hidden Cost of Data Centers. It's in Your Electric Bill



Data centers are driving up utility costs. As companies like Amazon and Microsoft pour billions into data centers across the country, it's raising electricity bills. While they're making record profits, the rest of us are forced to foot the bill.

But maybe this isn't the whole picture. Here's a really interesting article from the Washington Post [16](#):

But a new study from researchers at Lawrence Berkeley National Laboratory and the consulting group Brattle suggests that, counterintuitively, more electricity demand can actually lower prices. Between 2019 and 2024, the researchers calculated, states with spikes in electricity demand saw lower prices overall. Instead, they found that the biggest factors behind rising rates were the cost of poles, wires and other electrical equipment — as well as the cost of safeguarding that infrastructure against future disasters.

And in the same article, it continues:

“It’s contrary to what we’re seeing in the headlines today,” said Ryan Hledil principal at Brattle and a member of the research team. “This is a much more nuanced issue than just, ‘We have a new data center, so rates will go up.’”

North Dakota, for example, which experienced an almost 40 percent increase in electricity demand thanks in part to an explosion of data centers, saw inflation-adjusted prices fall by around 3 cents per kilowatt-hour. Virginia, one of the country’s data center hubs, had a 14 percent increase in demand and a price drop of 1 cent per kilowatt-hour. California, on the other hand, which lost a few percentage points in demand, saw prices rise by more than 1 cent per kilowatt-hour.

2. Backup Generators (Air Pollution & Noise)

Data centers need backup diesel generators for power outages (to keep servers running if the grid goes down). This proposal includes **nearly 50 diesel generators on-site** (likely giant industrial generators, each capable of ~2–3 MW).

These would mostly sit idle, *but* they have to be tested regularly – usually generators are run for maintenance maybe **1 hour a week or a few hours a month** to ensure they’ll work in an emergency. During outages (which are rare, but could happen), they might run for hours or days. Neighbors are very concerned about **diesel exhaust** and emissions from these units. Diesel exhaust contains particulate matter (soot) and nitrogen oxides (NOx), which can contribute to asthma, respiratory issues, and smog. If 50 generators all fire up for testing or an outage, that’s basically like having 50 diesel truck engines (actually much larger than a truck engine) running in the area. NES letter highlighted that these generators **emit pollutants that contribute to respiratory and cardiovascular disease**, and currently there are **no specific limits on how often they can run** in the proposal.

Typically, there are permitting rules—the Illinois EPA usually limits generator runtime for testing (often ~50-100 hours a year per generator for maintenance is allowed under clean air permits). But residents want assurances: could those hours be curtailed? Will they use the **cleanest tech (Tier 4 final diesel generators)** that have filters and reduce emissions? If the city approves, they could impose conditions like only running tests at certain times and using advanced emission controls. Still, it's a valid worry – even with Tier 4 generators, you don't really want a small power plant's worth of diesel engines rumbling near homes regularly.

Related is the **noise** issue from these generators and the cooling equipment. **Generator noise:** When they test, generators are loud (imagine 50 big rigs revving). If they all tested at once it'd be awful, but usually tests would be staggered. Neighbors still fear the occasional roar of these machines, especially in otherwise quiet evenings or weekends. More constant is **cooling fan noise:** Data centers run huge cooling systems (fans, chillers, cooling towers) 24/7. This creates a constant hum or drone. It can be like a low-frequency whir that, if not properly muffled, travels and irritates nearby residents. In Aurora (which already has some data centers), **people have complained about persistent noise** – both from generators and the ongoing fan noise – disturbing nearby neighborhoods.

 **Noise Impact**
2.58MB · PDF file Download

[Download](#)

Jacob & Hefner Associates, Inc. (2025, September). Noise impact assessment of proposed data center at 1960 W. Lucent Lane, Naperville, Illinois 60563 (JHA)

No. H477). Prepared for Karis Critical, 2150 Goodlette-Frank Road, Suite 700, Naples, FL 34102.

Aurora actually had so many complaints that their City Council just approved a **180-day moratorium on new data centers** until they create better noise and environmental rules [17](#).

Aurora has at least four data centers already and more planned, and the **noise was the biggest concern** officials heard, especially at night when background noise is low.

Naperville residents, learning from that, are demanding solid information on expected noise levels and how Karis will mitigate them.

At the Sept 3 Naperville hearing, Karis did present a noise study claiming they'll **meet the city's noise ordinance**.

The city is hiring an independent sound engineer to double-check that study.

Neighbors want things like sound walls, baffled fans, or other guarantees so that the noise doesn't become an annoyance. So noise and diesel pollution is a **key downside**, they can affect quality of life for people living nearby, and they're not just theoretical (other towns have experienced it).

Here's a great video focused on issues like noise.

Exposing The Dark Side of America's AI Data Center Explosion



3. Water Usage and Potential Strain

Data centers can use **a lot of water for cooling** (if they use evaporative cooling towers). Basically, to keep servers cool, many facilities evaporate water which carries away heat—it's very efficient compared to just using AC units, but it consumes water. In hot months, a large data center could use **hundreds of thousands of gallons of water per day**.

We don't have exact numbers from Karis yet (which is itself a complaint – people want transparency on this [18](#)). However, as mentioned, Karis said it should be less than what the old Lucent building used [19](#). If true, maybe it won't break the bank. Naperville does have an **allocation of Lake Michigan water** that should cover existing and some growth, but with climate change any big new water draw is scrutinized. The worry is if we get into a **drought** or water restrictions, a data center might still guzzle water while residents are asked to conserve. Or, the city might need to spend money on water

infrastructure if peak demand goes up (pumps, storage, etc.). Right now there are **no specific regulations or contract limits on how much water the data center could use.**

NEST and others think the city should impose limits or at least require the company to report usage and maybe use recycled water if possible.

Some data centers can use **air-cooled systems** (using outside air when cool enough, or chillers that don't consume water) or a **hybrid** approach to cut water use. We don't yet know the exact cooling design here.

So, the downside is mainly environmental: large water consumption could be seen as wasteful and could strain resources in extreme conditions. On the flip side, if they're buying a lot of water, they'll pay for every gallon – contributing to water utility revenue.

But public sentiment tends to be negative about using precious drinking water to cool server farms, especially if alternatives exist.

While we're on the issue of water – what's with all the new car washes popping up around the Western Suburbs? They use a ton of water, too!

Sure, they're low-maintenance businesses, but shouldn't we be building things that actually make our communities stronger, like parks, local shops or places where people can connect, instead of yet another car wash?

4. Fits the Area... or Not?

Another issue is **land use compatibility and aesthetics**. Neighbors in Naper Commons (a townhome development built very recently nearby) and other subdivisions like Danada Woods are saying this data center would be the “**odd thing out**” in an area that's become fairly residential and natural.

There's a forest preserve (Danada Woods) and many homes not far away. They expected the Lucent campus might become offices or something lower-key, not essentially an industrial facility. Data centers are often in industrial parks or more isolated areas – critics say this should be in a **heavier industrial zone not next to homes**.

Visually, the plan shows two large buildings (they'd likely be windowless, around maybe 40-50 feet tall boxes) with generators and cooling equipment yards, all fenced and screened. The developer will landscape and has a plan to make it look presentable (and Naperville will insist on things like berms, tree buffers, maybe a nice facade). But it's not going to be as pretty as a corporate HQ building, that's for sure. At night there might be some security lighting (though they'll likely use full cut-off fixtures to minimize light pollution). Still, some residents fear it will look like a giant warehouse or power plant, and it could impact **property values** of those nearby homes.

If you were house-hunting, would you pay the same for a home next to a data center vs next to a park or office? Possibly not, especially if there's noise or occasional diesel smells. Residents have explicitly voiced concern that their **property values could drop** due to this project ²⁰. It's hard to quantify that – a well-built, quiet data center behind trees might hardly be noticed, but if it's prominent and known to be noisy, it could indeed make the area less desirable. There's also a bit of a feeling of loss – as one person said, the area now is like an “**oasis of greenery and balanced development**”, and a data center campus feels like a disruption of that.

Essentially, people are protective of Naperville's image as a quiet, family-friendly suburb.

A data center sounds industrial and they fear it's out of character. This is subjective, but it's a valid community perspective: **quality of life and neighborhood character** might be negatively affected.

5. Environmental Impacts (Beyond Power & Water)

We covered power, water, and air/noise. Two other environmental angles: **stormwater and heat**. Building two giant buildings and an on-site substation means a lot of impervious surface (roofs, concrete). The developer did a stormwater management plan for Phase 1 ²¹, but apparently **Phase 2's stormwater impact hasn't been fully analyzed yet**.

Neighbors worry about runoff or flooding. Will the site's detention basins be enough? (Naperville has strict stormwater requirements, so they'll have to detain/slow-release water to not worsen flooding. But residents want to see those details, especially with Phase 2 doubling the size.) Also, data centers dump out a lot of **heat**. The heat removed from servers is often released to outside via cooling towers (as warm moist air) or air condensers (as hot air). This can create a **localized heat island** or thermal plume. If cooling towers are used, they also vent water vapor that can have additives (biocides to keep the water clean) – nothing too crazy, but something to consider if you live next door and suddenly have warm humid air blowing by. These are more technical concerns; most public comments centered on the big ones: power, noise, water, pollution, and aesthetics.

But generally, some folks feel a data center doesn't align with Naperville's sustainability goals – it could increase carbon footprint, use lots of resources and not *directly* benefit residents beyond money.

6. Not Many Permanent Jobs / Community Interaction

While there are some jobs, critics point out that per dollar invested or per acre of land, data centers **don't employ many people**. Two buildings on 40 acres might create maybe 30–50 permanent jobs total (just an estimate). If that same site were a corporate office campus or an R&D facility, it might house hundreds or even a thousand employees daily, which has a bigger positive impact on the local economy (restaurants, hotels, etc.). Or if it were a distribution center, it might employ a couple hundred (though that'd have its own truck issues). So some say a data center is a **low return in jobs** for the use of prime land. Additionally, data centers don't really interact with the community – no public visitors, no consumer services, etc.

It's basically a big box of computers. So if you're a resident, you won't directly engage with it (can't shop there, can't work there unless you're one of a few specialists).

Some would prefer development that integrates more with the community's daily life or provides broader opportunities.

Question for you all. What do you want in Naperville? Email us at info@napervillenow.com or DM us your answer on Instagram or Facebook at [@napervillenow](https://www.instagram.com/napervillenow)

7. Risk of Future Changes

This is more abstract, but what if in the future the data center industry changes? Could we end up with a giant empty specialized building if, say, cloud technology shifts or the company leaves?

Some worry about the **long-term flexibility** of such a site. It's built specifically as a data center, if it fails or tech moves on, will it be a blighted hulk? (Think

old factories that closed – could this be today’s equivalent if things go wrong?).

That’s a lesser concern given data demand is only growing in the foreseeable future, but it’s not impossible (e.g., if the facility becomes outdated it might require new investment or sit idle).

SO MANY CONCERNS!!!

Those are a lot of concerns!

To sum up the major ones: **residents are especially worried about noise, diesel pollution, heavy power usage affecting their bills, huge water use, and their home values.**

They basically feel a data center might benefit the city’s coffers but **they personally bear the negatives** (noise, visual, etc.).

This tension is why some are urging the city to either say “no thanks” or at least “pause and study more” (like Aurora did).

Neighborhood Concerns Drive Changes

Local residents—especially those in the adjacent Naper Commons, Danada Woods, and Fairmeadow subdivisions—have mobilized against the data center proposal for months. An online petition opposing the project has gathered over 2,100 signatures, with homeowners voicing worries about potential health effects, environmental impacts, noise, and property value losses. Dozens of residents spoke during public hearings, highlighting specific issues like the constant hum of generators and cooling equipment, diesel exhaust from

backup generators, and the facility's compatibility with the suburban neighborhood and nearby forest preserve.

Neighbors pointed to problems at a similar data center in Aurora (CyrusOne) where noise complaints arose when backup generators ran, suggesting Naperville could face the same. Others raised concerns about strain on the power grid, increased water usage, and possible traffic or drainage issues from such a large industrial operation.

These community objections and testimonies were a major factor in Karis Critical's decision to eliminate the second building from its plan and focus on a smaller initial development.

Developer's Sustainability and Community Pledges

In an effort to win support, Karis Critical has made a formal "Community Stewardship Pledge" detailing voluntary commitments on sustainability, noise, and community impact. Key elements of this pledge will be written into the project's conditions of approval as ongoing obligations of the operator:

- **100% Renewable Energy:** Although the data center will draw significant power (up to 36 MW) from Naperville's grid, Karis has committed to enroll in Naperville's Green Energy Certificate Program and purchase Renewable Energy Certificates (RECs) to match 100% of its electricity usage with energy from renewable sources [22](#). Through this program, every megawatt-hour the facility consumes would be offset by a megawatt-hour of wind or solar power added to the grid, certified by the city's municipal utility. This ensures the data center's electric demand is effectively met with green energy, addressing concerns about carbon footprint.

- **No Cost to Taxpayers:** Karis vows it will **not seek local tax incentives or subsidies** from the City of Naperville for this project ²³. The company will fund all required infrastructure upgrades itself – for example, paying the full cost of improvements to the nearby **Indian Hill electrical substation** and new power lines to supply the site. City officials have confirmed that the Indian Hill substation can accommodate Phase One's load, but Karis will bolster the system's capacity as needed at its own expense. According to the developer, this substantial private investment (over \$250 million in construction, not including tenants' equipment) will generate new property tax revenue and utility fees, *without* burdening local taxpayers.
- **Modern, Efficient Design:** The data center's design incorporates measures to minimize **noise, emissions, and water usage**. **Diesel backup generators (24 in total)** will only run during grid outages or routine testing, and **will not be used for peak shaving or non-emergency power** to avoid unnecessary noise. All generators will meet U.S. EPA **Tier 4** emission standards (the strictest for diesel engines) and be housed in containerized units with built-in sound suppression and fuel spill containment systems. To cool the servers, the facility will utilize an **air-cooled, closed-loop chiller system** that significantly limits water consumption. Karis estimates the data center will use *less water than the office complex* that previously stood on this property – on the order of under 5,000 gallons per day, which is very low for a data center of its size. Additionally, all exterior lighting will be **Dark Sky compliant**, and the company pledges to avoid any use of high-pollution materials like coal-tar pavement sealants on s

ENVIRONMENTALLY CONSCIOUS DESIGN & OPERATIONS

- **Battery Backup.** The Data Center will rely on containerized battery systems to provide bridging power between the time of a power out and back-up generators coming on-line. Each 2MWh containerized battery system will be housed in a 1-hour fire rated room. Karis coordinated with the Naperville Fire Department regarding the proposed battery storage and has committed to meeting standards of the 2018 International Fire Code (City is currently operating on 2018 IFC) for all battery storage systems.
- **Backup Generators.** The Data Center will rely on twenty-four diesel generators to provide emergency power in the event of an electrical outage. Karis commits that the generators will be used solely for emergency purposes- i.e. they will not be utilized for peak shaving.
- **Generator Standards.** Karis commits to using diesel generators that meet U.S. EPA Tier 4 emission standards. The generators shall be part of a containerized system that provides sound attenuation and integral fuel containment.
- **Water Usage.** Karis commits to using an air-cooled, closed-loop chiller system that minimizes the use of potable water. Karis reasons that the Data Center will use less water than the office building that previously occupied the property.
- **Sound Attenuation.** Karis commits to operating in compliance with applicable City of Naperville noise regulations. Essential infrastructure for the Data Center shall be programmed, constructed, and operated with sound attenuation consistent with the assumptions set forth in the Noise Impact Assessment submitted to the City of Naperville.
- **Dark-Sky Compliance.** Karis commits that all exterior lighting for the Data Center shall be dark sky compliant.
- **Prohibit Use of Coal Tar Sealants.** Karis commits that no coal tar sealants shall be utilized on privately owned drive-aisles or parking areas associated with the operation of the Data Center.
- **Electronic Waste Recycling Program.** Karis commits to the establishment of an electronic waste recycling program for the Data Center.
- **Electrical Usage.** Karis commits to capping leasable IT load of the Data Center to 36MW.

City of Naperville. (2025, October 15). *Planning and Zoning Commission agenda item: Russ Whitaker presentation on behalf of Karis [Public Hearing, Agenda Ready]*. Naperville Planning and Zoning Commission.

- **Restricted Use & Oversight:** In response to community questions about what kind of clients and data operations will be in the facility, Karis has explicitly **prohibited cryptocurrency mining** at this data center. Cryptocurrency mining is often cited as highly energy-intensive and was a concern for some residents. Karis envisions more conventional tenants (e.g. corporations, banks, IT firms) using the co-location servers. To ensure ongoing accountability, the developer will file annual “Property Stewardship” reports to the city for the first five years of operation, documenting compliance with noise, environmental, and safety standards as well as any community complaints and how they were addressed. These reports and the city’s standard inspections will provide **oversight** to make sure the data center lives up to its commitments long-term.

OVERSIGHT & ACCOUNTABILITY

- **Annual Property Stewardship Report.** For the first five years of commercial operations, Karis shall file a Property Stewardship Report detailing key operations of the campus, including the delivery of services from the city's electric and water utilities, statistics regarding reliability and operations of on-site backup generation, a property tax and fiscal impact summary, aggregate statistics for any requests for emergency services, and other operational information. The report shall detail any complaints or findings of violations that occurred during the calendar year, as well as the mitigation steps taken by the campus in response to these incidents. At the city's request, the obligation to submit the report can be renewed annually after the initial five-year period has elapsed.
- **Emergency Response and Safety Plan.** The campus shall establish and update, as necessary, an Emergency Response and Safety Plan that coordinates the potential responses of the City of Naperville, the Naperville Police Department, and the Naperville Fire Department to the property.
- **Point of Contact.** The Data Center operations team shall establish a primary and secondary point of contact for the City of Naperville (the "Emergency Contacts"). The Emergency Contacts shall be responsible for twenty-four seven communications with the City of Naperville.

City of Naperville. (2025, October 15). *Planning and Zoning Commission agenda item: Russ Whitaker presentation on behalf of Karis [Public Hearing, Agenda Ready]*. Naperville Planning and Zoning Commission.

Some Questions You May Be Asking Yourself

So many people don't know what to think of data centers and so many of you also reached out with questions on [Instagram](#). We compiled them and we will answer them now:

QUESTION: Could it lower property taxes?

Indirectly, yes, but don't expect miracles. As discussed in the pros, the data center would pay property taxes and utility taxes which add to public revenue. For example, at full build, it's about \$1.5 million/year in property taxes to all local bodies (nearly \$1M to schools, ~\$90k to the city, etc.)

It would also pay around **\$2–3 million/year in Naperville electric utility taxes/fees.**

In theory, more revenue from a commercial property means the city and other taxing bodies don't have to get as much from homeowners. This could **ease pressure on property tax rates** over time. For instance, if School Distr 203 gets an extra ~\$1M from the data center, maybe they won't need to raise as much from everyone else next budget. And the city's share, though modest plus the big utility tax haul, could help fund city services without raising taxes as quickly.

However, the effect on an individual homeowner's bill would likely be **small**. Naperville's total EAV (assessed value base) is in the billions, so an extra \$21 million EAV from the data center is a drop in the bucket. You might see a very slight dip or slower growth in the tax rate. It's not like your \$10k tax bill becomes \$5k because of one data campus. It's more like it might save each homeowner some tens of dollars per year at best – or simply improve services without tax hikes.

One exception: If Naperville were considering some bond or big project, having this new revenue could avoid a tax increase for that. Also, if the city were to use the **electric utility revenue** to support general funds, it could choose to keep property taxes lower. Some towns with lucrative industries manage to have lower residential taxes because businesses foot more of the bill. Naperville already has a healthy commercial tax base, and this would add a bit more. **So yes, it helps financially, but it's not a huge windfall for each resident.** The benefit is more collective (better funded schools, city budget relief) than individually noticeable tax cuts.

Also, note: we're assuming the data center isn't getting some special tax break. If the city or state gave it an abatement (like a deal to pay reduced taxes for years), then the benefit would be delayed or reduced. Illinois *does* have a **Data Center tax incentive program**, but that mostly gives sales tax exemptions c

the equipment (servers, building materials) if the project invests over \$250M and creates jobs. Karis would likely use that – which means they don't pay sales tax on a lot of stuff, but that mainly affects state revenue, not city property tax. Naperville could also negotiate something like a Payment In Lieu of Taxes (PILOT) or impact fees instead; but so far, we haven't heard of a big local tax break. So presumably, they will pay full property taxes like any property owner.

The data center would modestly expand the tax base and could slightly help lower or stabilize property taxes over time, but not drastically. The biggest direct financial win for the city is actually the utility revenue, which could benefit residents in other ways (like funding city improvements or keeping electric rates in check).

QUESTION: What are the benefits and downsides, in plain terms?

Benefits (recap): money coming in (taxes, utility payments), use of an empty site, a boost to the local economy during construction and some in operation, a sign of tech progress, very low daily traffic and little strain on services. It's basically "high tax output, low service input." Some people even say data centers are kind of **invisible neighbors** – you won't notice them much day-to-day if managed well (no crowds, no constant trucks, etc.). Plus, if Naperville sets **good standards**, this data center could be a model: for example, maybe they'll require it to use **renewable energy** or **reclaimed water** or have **noise dampening** features. That could make it a net positive showcase of sustainable design (that might be optimistic, but possible if conditions are imposed).

Downsides (recap): huge power use (could indirectly affect electric rates or climate goals), environmental concerns (diesel exhaust, carbon emissions, high water consumption, noise pollution), and local nuisances (the constant hum

the sight of industrial buildings, perceived hit to nearby home values). Also, doesn't create a lot of jobs or direct community benefits aside from taxes – some feel it's not worth the trade-off. There's a fear of the **unknown** too: If something goes wrong (e.g. if noise ends up louder than predicted, or if an outage forces generators to run for days), the neighbors are the ones who suffer. And once it's built, it's there for decades – hard to reverse. So opponents say, “Why rush? Let's study this more or ask the developer to meet stricter conditions first.”

Good for city revenue and the digital economy; potentially rough on the immediate neighbors and the environment. It's a classic trade-off between economic development and quality-of-life concerns.

QUESTION: If Naperville doesn't build it, would it just be built somewhere else? Why does it have to be Naperville?

This is a great question. Data center companies have some flexibility in location, but **not everywhere is equally suitable**. Karis chose Naperville for specific reasons: the site has **ready-to-go fiber optic infrastructure** (critical for a data center that needs to connect to networks), it's near other tech facilities and major telecom lines along I-88, it's a safe, stable area (low natural disaster risk, good security), and Naperville's electric utility can presumably offer reliable power. Also, the parcel is the right size (40 acres) and already zoned appropriately – that's not easy to find in the Chicago suburbs near existing fiber routes.

Could they go elsewhere? **Possibly, yes**. If Naperville said “no” outright, Karis might look to a neighboring town or another suburb in the region. For instance, **Aurora, Lisle, Warrenville, Bolingbrook, Batavia/Geneva**, or even out to **DeKalb** (where some big data centers have gone) could be alternative. However, each of those has pros/cons. Aurora (just next door) actually has

several data centers and was welcoming them, but as we saw, Aurora just had a “pause” with a moratorium because of issues that came up. Aurora currently has four data centers running and five more proposed, so they’re not desperate for another right now – plus, Aurora doesn’t own the electric utility (ComEd supplies it), meaning the city of Aurora doesn’t financially gain as directly from data centers’ power use. Naperville, by owning its utility, stands to gain more (which is partly why data centers are extra attractive to Naperville – they’d get that utility revenue). If not Naperville, Karis might look at **DuPage County unincorporated land** or other municipalities. But a lot of DuPage is built out or has similar community concerns. Maybe **west of Aurora or south in Will County** (around Joliet or Plano etc.) where there’s more open land and perhaps fewer neighbors to object. Yet moving farther out might lose the **latency advantage** – one reason they want to be in Naperville is likely to serve businesses in the metro area with minimal network latency (Naperville is only ~30 miles from downtown Chicago and well-connected). If they go too far, it’s less attractive for those clients.

They also specifically want that **Lucent fiber** – the Daily Herald mentioned Brett Rogers (Karis CIO) saying there’s “quite a bit of fiber optic cable tied to the original Lucent campus” and “**that’s kind of why we like this site so much.**”²⁴ So Naperville is uniquely appealing. If Naperville says no, Karis could try to find another spot on that same fiber line (maybe in **Lisle or Warrenville**). Part of that Lucent/Nokia campus spans Naperville and possibly Warrenville or Lisle. If, for example, the portion of land in Warrenville were available, they might try there – but Warrenville is smaller and might also be cautious; plus Naperville might control utility service in that immediate area (not sure of boundaries).

Another angle: **If not here, someone else might build a data center in the region anyway.** The Chicago area is a hot market for data centers due to its

central location and climate (cool enough, low natural disasters). Illinois also gives tax incentives for them. So the question the city might ponder is, “Do *capture this investment, or let it go to another town or state?*” If Naperville turns it away, Karis could potentially go to a place like **Elk Grove Village** (which already has a huge data center cluster and is very pro-data center), **Mount Prospect** or **Hoffman Estates** – basically other suburbs that have welcomed data centers. Those are further from Naperville, but they have fiber connectivity and power too. Of course, if it goes further, Naperville residents wouldn’t have to deal with any nuisance at all – but then Naperville also gets \$0 of the benefits.

QUESTION: Why does it have to be Naperville?

It doesn’t *have* to be, but Naperville offers a sweet spot of infrastructure, location, and (potentially) an agreeable city government.

Karis likely spent a lot on planning this already (land option, studies, etc.), so they clearly prefer Naperville. The city also initially appeared open (city staff worked on conditions rather than flat-out rejection). Naperville is one of the few suburbs with its own utility, and that combo of **city-owned power + available land + fiber connectivity + tech corridor** makes it fairly special. If Naperville rejects it, Karis might try a nearby town, but they’d face similar or worse challenges (Aurora has moratorium, others might have zoning issues or less ideal fiber). They could go to a more industrial area (like west of Aurora or an enterprise zone), but then the data center might not serve the market they want as effectively. Sometimes, companies really want to be in a specific electric grid or fiber network location – that Lucent site probably has direct fiber routes to Chicago’s financial centers (for banks and trading maybe), which is gold for a colocation facility.

Opponents might say, “Fine, let them have it, we value our peace and quiet more.” It really depends on priorities.

So likely, if Naperville said “no,” Karis would **either wait** (maybe hoping political change or a moratorium ends) or **pick the next best location**. That could be just outside Naperville. For residents, that scenario could be ironic: you’d see a data center go up in the area, but Naperville wouldn’t get the tax or utility benefit (for example, if it went across the road into Aurora after the moratorium ends or into unincorporated land with ComEd power). It’s a tough call – no city wants to be the “dumping ground” for an unwanted land use, but if the demand is there, it will land somewhere.

The question of “if not here, where?” often comes up in these debates. Proponents say, “If we don’t build it, some other town will, and they’ll get the money.” Opponents might say, “Fine, let them have it, we value our peace and quiet more.” It really depends on priorities.

QUESTION: So, should Naperville support it or not?

You asked bluntly: “are they good or bad, should we support them or not support them at all in a city like Naperville?” After going through all this, the answer is not 100% one way or the other – it’s about weighing trade-offs.

If you value economic benefits and accept some industrial presence, you’d lean toward **support with conditions**. The conditions would be key: Naperville could require the data center to be as **responsible** as possible – for example, use **the latest noise suppression tech**, commit to **using a certain percentage of renewable energy** (or funding local solar farms), install **water-efficient**

cooling (or even use graywater if available), use **Tier 4 diesel generators** and limit testing to daytime hours, build **berms and landscaping** to hide the facility, etc. Also, have the data center pay for any necessary grid or road upgrades upfront. By doing this, the city tries to **maximize the pros (revenue jobs)** and **minimize the cons (disturbances, environmental impact)**. The Naperville P&Z commission seems to be heading in that direction – they haven't rejected it; they're digging for more info to impose proper safeguards. The city staff's recommended conditions show they want phase-by-phase approval and third-party checks (like the independent sound study).

So a likely outcome if it moves forward is a yes **with a lot of strings attached**. That could make it a net positive or at least an acceptable addition.

If you prioritize environmental sustainability and neighborhood peace above all, you might lean toward “do not support” (at least not now).

The argument there is: Naperville doesn't *need* to take on this project – the risks to community well-being (noise, pollution, etc.) and potential long-term costs (climate impact, infrastructure wear) might outweigh the money. And frankly, \$90k in city property tax and even a couple million in utility fees might not be worth upsetting residents and risking any negative outcomes. Especially when you have an engaged community that clearly has concerns ignoring them could cause ongoing conflict and complaints for years.

Naperville is a prosperous city; it might decide it's okay passing on this kind of development, focusing on other types that align better with its community goals (perhaps offices, clean industries, etc., that have more jobs or less environmental impact). Also, the moratorium idea suggests: better to **hit pause and make rules first**. Aurora is writing stricter zoning rules for data centers during their moratorium.

Naperville could do the same: delay this project for 6 months, create ordinances about noise limits, emergency generator use, water use reporting etc., then let the developer reapply under those rules. That's a cautious approach some favor, to ensure any data center is done on **Naperville's terms**.

At the end of the day, a balanced view (and what we suspect the final stance will be) is: **Support it *with strong conditions and safeguards*, or don't approve until those conditions are met.**

No one's saying data centers themselves are "evil" – even the neighbors acknowledge they are "essential hubs of the digital world".²⁵ It's more about *how* it's done. If Naperville can get the benefits while tightly controlling the downsides, it could be a win-win. If not, saying no or waiting might be the wiser choice.

What's Next???

The Naperville Planning and Zoning Commission's Oct. 15 meeting to review the Karis Critical proposal drew a large turnout and lasted late into the night.

Dozens of residents provided verbal or written comments, leading the commission to reconvene the public hearing that had begun in September to hear all testimony before deliberating. Given the volume of information and concerns aired, public comment on the item went past 11 p.m.

The commissioners ultimately opted to delay their vote on the project.

"I do feel it's very valuable to take additional time," PZC Chair Whitney Robbins said, noting that the issue was too important to rush a decision. The case was continued to the commission's next meeting on November 5, 2025 at which time the panel is expected to discuss the proposal in depth, weigh

the evidence, and likely make a recommendation to the City Council. ²⁶ “I would have loved to have been able to get through this and close this case, but too important, and we’ve all invested so much time,” Robbins explained regarding the delay. “I want to be very thorough when we make that vote and feel good about it, whichever way we go.” ²⁷

When the Planning and Zoning Commission does vote, they will be formulating an **advisory recommendation** for the Naperville City Council. The final decision on approving the conditional use for the data center (and associated variances for parking and wall height) rests with the City Council at a subsequent meeting. City staff have already indicated their support for approving Phase One of the project, provided that a lengthy list of conditions is attached to ensure the developer follows through on all mitigation measures and community commitments ²⁸. Those conditions encompass items such as the noise monitoring and extra analysis, ongoing compliance reporting, dark-sky lighting enforcement, limits on any future expansions or changes, **land-banked parking** (114 extra spaces that must remain reserved green space in case parking demand ever warrants building them), and even requirement to **decommission or repurpose** the facility at the end of its life that a defunct data center isn’t left abandoned. Karis Critical has signaled willingness to accept these conditions as part of an eventual approval.

Barring any further continuances, the PZC will take up the **Karis data center proposal again on Nov. 5**, where commissioners can debate its merits and likely cast a vote. At that point, the **Naperville City Council** would be the next to weigh in – possibly before the end of the year. In the meantime, the **20 acres of land** that would have been Phase Two will remain vacant. “We don’t expect that it’s forever going to remain vacant,” Whitaker said of the unused portion, “but we’ve pulled the data center concept off the table” for that area for now ²⁹.

What might eventually occupy the rest of the property is unknown, but any future proposal would require its own approval process. For now, all eyes are on Phase One. **If approved**, Naperville's first major data center would move forward under heightened scrutiny – a test case not only for Karis Critical's promises of being a “*good neighbor*” but also for how the city balances high-tech growth with community expectations.

CONCLUSION

This has been long! But we felt it was important to explain all the argument from both sides so YOU the NAPERVILLE resident can make a good decision. We did the research for you so you can make your own opinion!

To conclude...this is what we will say.

Data centers and relationships have a lot in common: both need cooling systems, both crash under pressure, and both drain your resources if you're not careful.

That is to say, they have good and bad sides!!!

They can bring money and tech progress to Naperville—potentially even help your taxes a bit—but they come with noise, huge resource use, and not a lot of direct benefits to your daily life.

If Naperville doesn't allow it, the data center will probably pop up somewhere else (the demand isn't going away), but maybe not as conveniently, and Naperville would lose the revenue.

It doesn't *have* to be Naperville, but Naperville was chosen for solid reasons

So the city has to decide, “Do we want to be part of this digital infrastructure trend and take the benefits with the headaches, or do we pass for now and let some other location handle it?”

Ultimately, the future of Naperville doesn’t lie in avoiding the complexities of progress but rather in thoughtfully embracing and managing them.

Either way, Naperville’s story continues. And right now, you hold the pen.

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SOURCES & LINKS to understand the impact of data centers.

Generally

- [Exposing The Dark Side of America's AI Data Center Explosion](#)
- [We Found the Hidden Cost of Data Centers. It's in Your Electric Bill](#)

- Bosker, B. (2023, October 12). [Why everything is getting louder: The tech industry is producing a rising din. Our bodies can't adapt.](#) The Atlantic.

Naperville-Specific

- [Naperville Planning & Zoning Commission Staff Report – Case DEV-005 2025 \(Oct. 15, 2025\)](#)
- Naperville Community Television (NCTV17) – “[Naperville residents push back against data center proposal along I-88 corridor](#)” (Sept. 4, 2025) – coverage of the Planning & Zoning Commission hearing and resident concerns
- Daily Herald – “[‘Odd thing out’: Neighbors upset about proposed data center development in Naperville](#)” by Katlyn Smith (Sept. 8, 2025) – detailed news article on the Karis data center plan, including project details, resident quotes, and city staff recommendations.
- Daily Herald (Submitted by NEST) – “*NEST recommends six-month moratorium on data centers in Naperville*” by Fernando Arriola (Oct. 13, 2025) – opinion piece from Naperville’s Environment and Sustainability Task Force outlining concerns about the data center (electric demand 4 increase, ~50 diesel generators, noise, water, etc.) and urging a 6-month pause.
- ABC7 Chicago – “[Aurora City Council approves temporary moratorium on new data centers](#)” by Evelyn Holmes (Sept. 26, 2025) – report on Aurora’s 180-day pause on data centers due to resident complaints about noise, traffic, and environmental issues with existing facilities.
- City of Naperville – **Planning and Zoning Commission Agenda/Reports for 1960 Lucent Lane (Karis Data Centers)** – official documents including the development petition, staff conditions, and a fiscal impact study by

Gruen Gruen + Associates (July 2025) estimating tax revenues. These provide the projections for property tax and utility tax income to the city and other districts.

- If you have strong feelings about the proposal, either way, **make your voice heard.**
 - Residents have already started conversations and even launched petitions, like [this one on Change.org urging the city to deny the proposed data centers](#)
 - They have started an Instagram account at [@napervilleagainstdatacenters](#). If you support their cause, follow them.
- If you want to learn more about the proposal, check out [napervilledatacenter.com](#).
 - The developer, Karis, goes into detail about what the project is about as well as they call a “Stewardship Pledge.”

¹ “Karis Critical scales back proposed data center in Naperville.” Chicago Tribune, Oct. 2025, www.chicagotribune.com/2025/10/14/karis-critical-scales-back-proposed-data-center-in-naperville

Developers have **scaled back** their original plan in response to feedback from Naperville city staff and concerned residents. The initial proposal called for two identical 211,000-square-foot data center buildings (72 megawatts total) on the 4-acre site. Now, **only Phase One** – a single 36-megawatt data center building with office component.

Approximately 20 acres that would have held a second building will remain vacant for now, with the developer stating that any future use of that portion is undecided and **will not be a data center under the current plan.**

- 2 Gruen Gruen + Associates. (2025, July). [The potential fiscal impacts of the proposed Karis Critical Data Center development in Naperville](#) (Report No. C1695). Report Karis Critical, LLC.
- 3 Gruen Gruen + Associates. (2025, July). [The potential fiscal impacts of the proposed Karis Critical Data Center development in Naperville](#) (Report No. C1695). Report Karis Critical, LLC.
- 4 Gruen Gruen + Associates. (2025, July). [The potential fiscal impacts of the proposed Karis Critical Data Center development in Naperville](#) (Report No. C1695). Report Karis Critical, LLC.
- 5 Smith, Katlyn. "Odd Thing Out': Neighbors Upset About Proposed Data Center Development in Naperville." *Daily Herald*, 8 Sept. 2025, www.dailyherald.com/20250908/news/odd-thing-out-neighbors-upset-about-proposed-data-center-development-in-naperville/
- 6 Smith, Katlyn. "Odd Thing Out': Neighbors Upset About Proposed Data Center Development in Naperville." *Daily Herald*, 8 Sept. 2025, www.dailyherald.com/20250908/news/odd-thing-out-neighbors-upset-about-proposed-data-center-development-in-naperville/
- 7 Learn more about it [here](#).
- 8 "Karis Critical Plans Data-Center Complex in Naperville." *The Real Deal*, TRD Sta Aug. 2025, therealdeal.com/chicago/2025/08/06/karis-critical-plans-data-center-complex-in-naperville/.
- 9 Naperville Community Television (NCTV17) – "[Naperville residents push back against data center proposal along I-88 corridor](#)" (Sept. 4, 2025) – coverage of the Planning & Zoning Commission hearing and resident concerns
- 10 Smith, Katlyn. "Odd Thing Out': Neighbors Upset About Proposed Data Center Development in Naperville." *Daily Herald*, 8 Sept. 2025,

www.dailyherald.com/20250908/news/odd-thing-out-neighbors-upset-about-proposed-data-center-development-in-naperville/

- 11 Daily Herald (Submitted by NEST) – “NEST recommends six-month moratorium on data centers in Naperville” by Fernando Arriola (Oct. 13, 2025) – opinion piece from Naperville’s Environment and Sustainability Task Force outlining concerns about the data center (electric demand 44% increase, ~50 diesel generators, noise, water etc.) and urging a 6-month pause.
- 12 Daily Herald (Submitted by NEST) – “NEST recommends six-month moratorium on data centers in Naperville” by Fernando Arriola (Oct. 13, 2025) – opinion piece from Naperville’s Environment and Sustainability Task Force outlining concerns about the data center (electric demand 44% increase, ~50 diesel generators, noise, water etc.) and urging a 6-month pause.
- 13 City of Naperville. (2025, October 15). *Planning and Zoning Commission agenda item: Russ Whitaker presentation on behalf of Karis* [Public Hearing, Agenda Read Naperville Planning and Zoning Commission].

LOCAL INVESTMENT

- **Utility Infrastructure Improvements.** The City has confirmed that sufficient electrical load is available at the Indian Hill Substation to power the Data Center. Karis will fund 100% of the expense for necessary improvements to the Indian Hill Substation and for the extension of electrical feeds from the Indian Hill Substation to the Data Center.
- **Total Karis Investment.** Karis will make a minimum investment of \$250,000,000 in the Data Center. Karis’ investment is exclusive of tenant IT infrastructure which will represent additional investment of hundreds of millions of dollars.
- **No Local Subsidy.** Karis will not seek any subsidy or rebate from the City of Naperville regarding the development of the Data Center.

- 14 Daily Herald (Submitted by NEST) – “NEST recommends six-month moratorium on data centers in Naperville” by Fernando Arriola (Oct. 13, 2025) – opinion piece from Naperville’s Environment and Sustainability Task Force outlining concerns about the data center (electric demand 44% increase, ~50 diesel generators, noise, water etc.) and urging a 6-month pause.
- 15 Daily Herald (Submitted by NEST) – “NEST recommends six-month moratorium on data centers in Naperville” by Fernando Arriola (Oct. 13, 2025) – opinion piece from Naperville’s Environment and Sustainability Task Force outlining concerns about the data center (electric demand 44% increase, ~50 diesel generators, noise, water etc.) and urging a 6-month pause.
- 16 Osaka, Shannon. “There’s a Reason Electricity Prices Have Been Rising. And It’s Not Data Centers.” *The Washington Post*, 25 Oct. 2025, www.washingtonpost.com/climate-environment/2025/10/25/data-centers-electricity-prices-rise/. Archived [here](#).
- 17 ABC7 Chicago – “[Aurora City Council approves temporary moratorium on new data centers](#)” by Evelyn Holmes (Sept. 26, 2025) – report on Aurora’s 180-day pause on data centers due to resident complaints about noise, traffic, and environmental issues with existing facilities.
- 18 Deny the Proposed Data Centers. Petition by Neighborhoods of Danada Woods, FairMeadow, and Naperville Commons, Change.org, 10 Aug. 2025, www.change.org/p/deny-the-proposed-data-centers
- 19 “Karis Critical Plans Data-Center Complex in Naperville.” *The Real Deal*, TRD Staff Aug. 2025, therealdeal.com/chicago/2025/08/06/karis-critical-plans-data-center-complex-in-naperville/.
- 20 Naperville Community Television (NCTV17) – “[Naperville residents push back against data center proposal along I-88 corridor](#)” (Sept. 4, 2025) – coverage of the Planning & Zoning Commission hearing and resident concerns

- 21 City of Naperville. (2025, August 29). *File #25-1103B: Reconvene public hearing ar continue case DEV-0057-2025 (Karis Critical Data Centers)*. Legistar. Retrieved fr <https://naperville.legistar.com/LegislationDetail.aspx?ID=7642974&GUID=65E73B7D-4CBB-4661-98E5-3D53DACF2B6A>
- 22 Karis Critical Member, LLC. Community Stewardship Pledge. Naperville Data Center, <https://napervilledatacenter.com/community-stewardship-pledge/>
- 23 Karis Critical Member, LLC. Community Stewardship Pledge. Naperville Data Center, <https://napervilledatacenter.com/community-stewardship-pledge/>
- 24 Smith, Katlyn. “Odd Thing Out’: Neighbors Upset About Proposed Data Center Development in Naperville.” *Daily Herald*, 8 Sept. 2025, www.dailyherald.com/20250908/news/odd-thing-out-neighbors-upset-about-proposed-data-center-development-in-naperville/
- 25 Smith, Katlyn. “Odd Thing Out’: Neighbors Upset About Proposed Data Center Development in Naperville.” *Daily Herald*, 8 Sept. 2025, www.dailyherald.com/20250908/news/odd-thing-out-neighbors-upset-about-proposed-data-center-development-in-naperville/
- 26 Fidlin, D. (2025, October 16). *Naperville commission delays vote on proposed data center*. NCTV17. Retrieved from <https://www.nctv17.org/news/naperville-commission-delays-vote-on-proposed-data-center/>
- 27 Fidlin, D. (2025, October 16). *Naperville commission delays vote on proposed data center*. NCTV17. Retrieved from <https://www.nctv17.org/news/naperville-commission-delays-vote-on-proposed-data-center/>
- 28 City of Naperville. (2025, October 15). *Reconvene the public hearing for 1960 Luce Lane (Karis Critical Data Centers) – DEV-0057-2025 [Public hearing record No. 2 1103C, Version 1]*. *Naperville Legistar*. Retrieved from <https://naperville.legistar.com/LegislationDetail.aspx?ID=7699841&GUID=C469BC71-3C31-4819-A8BB-553770AFA1E7&FullText=1>

29 Fidlin, D. (2025, October 16). *Naperville commission delays vote on proposed data center*. NCTV17. Retrieved from <https://www.nctv17.org/news/naperville-commission-delays-vote-on-proposed-data-center/>

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Jennifer L. Pelton, Esq. Oct 18

no <https://outlawedbyjp.substack.com/s/a-primer-on-data-centers-and-the>

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Kopinski, Sara

From: Iwicki, Brad
Sent: Tuesday, October 28, 2025 1:28 PM
To: Kopinski, Sara
Subject: FW: Public hearing for DEV-0057-2025 Karis Critical Member, LLC
Attachments: Virgina-Report-Rpt598 (1).pdf

FYI – POD Data Center public comment

Brad Iwicki

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The City's online Civic Access portal is now live! Please use the following link to submit and manage your development cases: <https://napervilleil-energovweb.tylerhost.net/apps/SelfService#/home>. All development invoices are now sent through the Civic Access portal. If you have any questions regarding your invoice, please contact your project manager.

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Sent: Tuesday, October 28, 2025 1:02 PM
To: Planning <Planning@naperville.il.us>
Subject: Public hearing for DEV-0057-2025 Karis Critical Member, LLC

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DO NOT click links or open attachments unless you confirm the incoming address of the sender and know the content is safe.

Dear Planning,

Wanted to make sure that everyone on staff and the board was aware of the Virginia Joint Legislative Audit and Review Commission study to review the impacts of the data center industry in Virginia.

The link to the report and presentation is here:

<https://jlarc.virginia.gov/landing-2024-data-centers-in-virginia.asp>

But I have also included a copy of the PDF report.

Important Sections Are:

Page: 12 (viii) - Localities have allowed data centers to be built near neighborhoods, but some localities are taking steps to minimize residential impacts

Page: 12 (viii) - Data center noise near residential areas presents unique challenges, and some localities are unsure about their authority to address it

Page: 14 (x) - Expressly authorize local governments to establish and enforce maximum allowable sound levels for operational data center facilities using alternative low frequency metrics and zoning ordinances.

While this should not be part of the Planning and Zoning decision process it is important to note that:

Page: 5 (i) - Data centers provide positive economic benefits to Virginia's economy, mostly during their initial construction

Thank You,

James Butt

██████████

Report to the Governor and the General Assembly of Virginia

Data Centers in Virginia

2024



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Summary: Data Centers in Virginia

WHAT WE FOUND

Data centers provide positive economic benefits to Virginia's economy, mostly during their initial construction

Data centers provide positive benefits to Virginia's economy mostly because of the industry's substantial capital investment. The primary benefit comes from the initial construction of data centers. Most construction spending likely remains in the state economy because much of it goes to Virginia-based businesses providing construction materials and services.

Data centers employ fewer employees than some other industries, but data center jobs tend to be high paying. Several data center representatives indicated that a typical 250,000-square-foot data center may have approximately 50 full-time workers, about half of which are contract workers. Data center construction supports a substantially larger number of workers. Construction of an individual data center building usually takes about 12 to 18 months, and data center representatives indicated that, at the height of construction, approximately 1,500 workers are on site from various construction-related industries.

Overall, the data center industry is estimated to contribute 74,000 jobs, \$5.5 billion in labor income, and \$9.1 billion in GDP to Virginia's economy annually. Most of these economic benefits derive from the construction phase rather than data centers' ongoing operations. The economic benefits from the industry are concentrated in Northern Virginia, where most data centers are located, but other regions of the state also benefit because data centers are also located there, or they are home to businesses that provide materials for data center construction.

Data centers can generate substantial local tax revenues for localities that have them

Localities with data centers can collect substantial tax revenues from the industry, primarily from business personal property and real property (real estate) taxes. The amount of local data center revenue depends on several factors, such as the size of a locality's data center market and local tax rates. Some localities have greatly reduced their business personal property tax rates for computer equipment to try to attract data centers, but this also reduces the revenue they can collect from the industry. For the

WHY WE DID THIS STUDY

In 2023, the Joint Legislative Audit and Review Commission directed staff to review the impacts of the data center industry in Virginia.

ABOUT DATA CENTERS

Data centers are specialized facilities that manage, process, and share large amounts of data. They enable the digital services that people rely on daily, including websites, electronic applications, and cloud-based platforms, such as email and media streaming. Northern Virginia is the largest data center market in the world, constituting 13 percent of all reported data center operational capacity globally and 25 percent of capacity in the Americas. Multiple factors have contributed to Northern Virginia's market prominence, including a strong fiber network, supply of reliable cheap energy, available land, proximity to major national customers, and the creation of a state data center tax incentive. The data center industry is growing rapidly in Virginia, both in established markets and newer ones. Significant new market growth is expected in counties outside of Northern Virginia and along the I-95 corridor to Central Virginia.

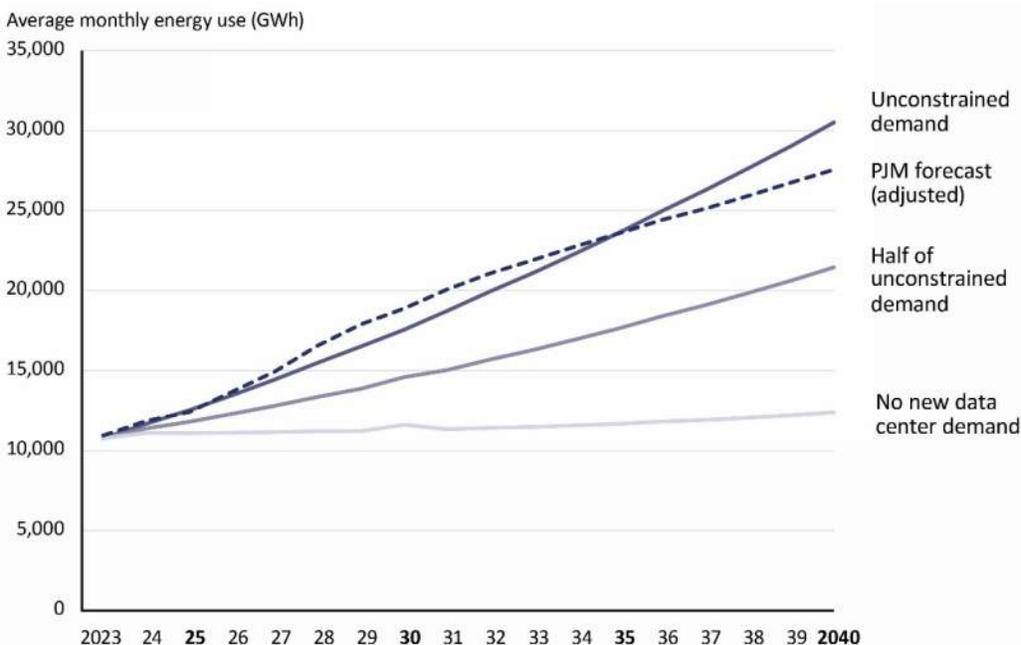
five localities with relatively mature data center markets, data center revenue ranged from less than 1 percent to 31 percent of total local revenue.

Localities in economically distressed areas of the state could benefit from data centers through increased local tax revenue, but these localities could have difficulty attracting the industry. Access to power and large, flat areas of land are key requirements for data centers, but are not available in some distressed areas, particularly in Southwest Virginia. Many distressed localities are also in rural areas that are away from data center customers and population centers, which makes it harder for them to attract the industry. However, these localities may be able to compete for data centers running certain artificial intelligence (AI) workloads, such as training. These localities could potentially become more attractive to the industry if they are able to proactively develop industrial sites suitable to data centers.

Data center industry is forecast to drive immense increase in energy demand

Modern data centers consume substantially more energy than other types of commercial or industrial operations. Consequently, the data center industry boom in Virginia has substantially driven up energy demand in the state, and demand is forecast to continue growing for the foreseeable future. The state's energy demand was essentially flat from 2006 to 2020 because, even though population increased, it was offset by energy efficiency improvements. However, an independent forecast commissioned by JLARC shows that unconstrained demand for power in Virginia would double within the next 10 years, with the data center industry being the main driver. JLARC's independent forecast largely matches the most recent forecast by PJM, which is the regional organization that coordinates generation and transmission operations for Virginia and several other eastern and midwestern states.

Data center demand would drive immense increase in energy needs in Virginia, based on JLARC’s independent forecast and other forecasts



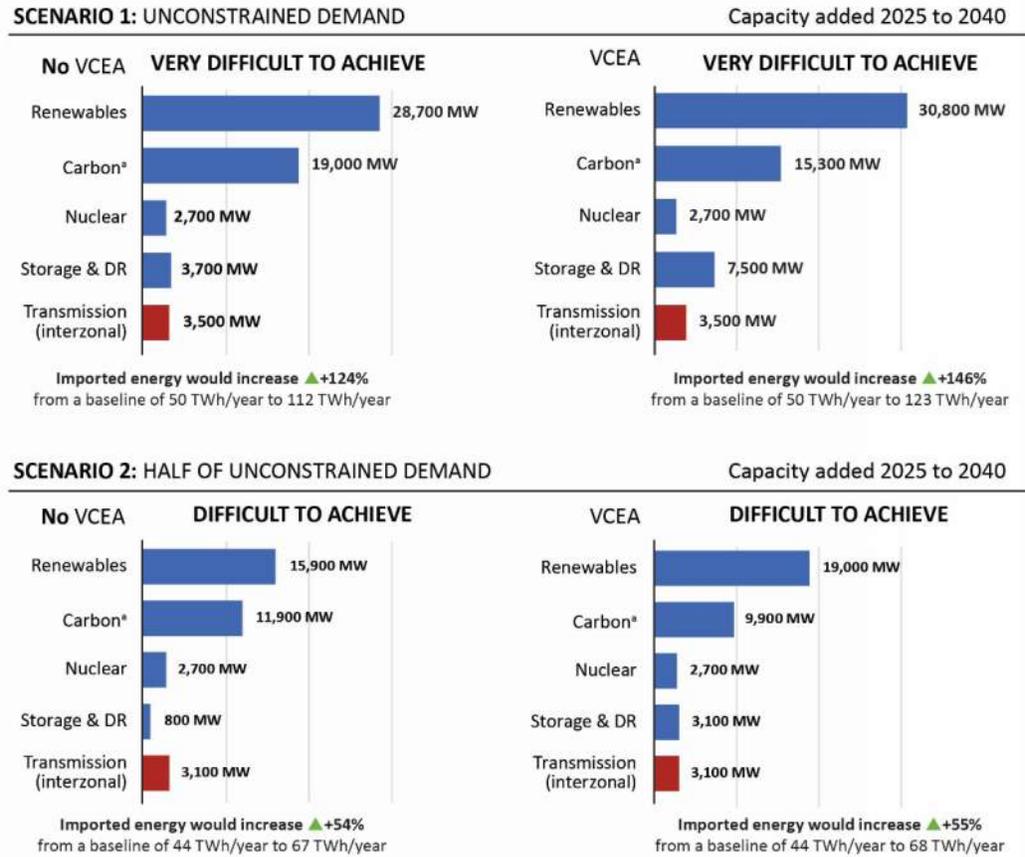
SOURCE: JLARC staff consultant analysis.

NOTE: A detailed note is provided for this figure in Chapter 3.

Building enough infrastructure for unconstrained data center demand will be very difficult and meeting half that demand is still difficult

An independent model of the energy grid commissioned by JLARC staff found that a substantial amount of new power generation and transmission infrastructure will be needed in Virginia to meet unconstrained energy demand or even half of unconstrained demand. Building enough infrastructure to meet unconstrained energy demand will be very difficult to achieve, with or without meeting the Virginia Clean Economy Act (VCEA) requirements (Scenario 1, figure). New solar facilities, wind generation, natural gas plants, and increased transmission capacity would all be required to meet unconstrained demand, and the number of projects needed would be very difficult to achieve. For example, new solar facilities would have to be added at twice the annual rate they were added in 2024, and the amount of new wind generation needed would exceed the potential capabilities of all offshore wind sites that have so far been secured for future development. Large natural gas plants would also need to be added at an equal or faster rate than the busiest build period for these facilities (2012 to 2018), depending on VCEA compliance.

Estimated generation mix needed to meet demand scenarios, with and without meeting VCEA requirements



SOURCE: E3 grid modeling analysis.

NOTE: A detailed note is provided for this figure in Chapter 3.

^a Carbon includes natural gas, coal, and oil. Biomass facilities are counted as renewable resources, per the VCEA.

However, starting in 2045, E3's grid model assumes natural gas plants would be converted to hydrogen fuel in each scenario when VCEA requirements are met.

Building enough infrastructure to meet half of unconstrained energy demand would also be difficult (Scenario 2 above). If VCEA requirements were not considered, the biggest challenge would be building new natural gas plants. New gas would need to be added at the rate of about one large 1,500 MW plant every two years for 15 consecutive years, equal to the busiest period of the last decade (2012 to 2018). If it is assumed that VCEA requirements would be met, the biggest challenges would be building enough wind, battery storage, and natural gas peaker plants. Wind generation needs would be the same as the unconstrained demand scenario. The amount of new battery storage would be several times the small amount currently in place in Virginia and a significant number of new natural gas peaker plants would have to be constructed. Both Scenarios 1 and 2 would rely on energy from as yet unproven nuclear technologies.

The state could encourage or require data centers to take actions to help address their energy impacts by promoting development of renewable energy generation, participating in demand response programs, and managing energy efficiency. However, these actions would have only a marginal impact on decreasing data center energy demand.

Existing electric utility requirements and processes help limit risks associated with system capacity and reliability

Data centers' projected energy demand increases have raised concerns about whether enough infrastructure can be built to keep pace. Currently, PJM attempts to protect regional grid reliability by requiring utilities to secure sufficient generation capacity plus a reserve margin, and the state requires utilities to develop plans that describe how generation capacity needs will be met. However, individual electric utility planning does not guarantee that the generation resources needed for the whole PJM region will be built because regional generation is not centrally planned. This is less of a concern with transmission because PJM and utility transmission owners centrally identify the impact large loads are expected to have, and how those loads can be brought on safely without causing transmission reliability problems.

If utilities are unable to build enough new infrastructure to keep pace with demand, one of the main ways they can protect grid reliability is by delaying the addition of new large load customers until there is adequate generation and transmission capacity. Utilities appear to be able to delay large load additions for transmission-related concerns, but it is less clear if they are allowed to delay adding new load because of generation concerns.

Data centers are currently paying their full cost of service, but growing energy demand is likely to increase other customers' costs

JLARC staff commissioned an independent study of electric utility cost recoveries under current rate structures to see if the data center industry is paying its share of current costs. The study found that current rates appropriately allocate costs to the customers responsible for incurring them, including data center customers.

However, data centers' increased energy demand will likely increase system costs for all customers, including non-data center customers, for several reasons. A large amount of new generation and transmission will need to be built that would not otherwise be built, creating fixed costs that utilities will need to recover. It will be difficult to supply enough energy to keep pace with growing data center demand, so energy prices are likely to increase for all customers. Finally, if utilities are more reliant on importing power, they may not always be able to secure lower-cost power and will be more susceptible to spikes in energy market prices. A typical residential customer of Dominion Energy could experience generation- and transmission-related costs increasing by an estimated \$14 to \$37 monthly in constant (or real) dollars by 2040 (independent of inflation). Establishing a separate data center customer class, changing cost allocations,

and adjusting utility rates more frequently could help insulate non-data center customers from statewide cost increases.

Data centers create additional financial risks to electric utilities and their customers

The data center industry presents additional financial risks to electric utilities and their customers because of the sheer size of the industry's energy demand. One risk is that utilities will build more generation and transmission infrastructure than is needed if forecast demand does not materialize, or several large data centers close. This could strand utilities with infrastructure costs that would have to be recouped from their existing customer base. Another risk is particular to electric co-ops, which are not-for-profit companies that are owned by their member customers. If a data center customer delayed, disputed, or failed to pay an energy generation bill and the co-op was unable to recoup these costs from the customer, they would ultimately have to be paid by all other co-op members. A large enough bill could potentially result in a co-op defaulting and going bankrupt.

Another risk relates to data center participation in the state's retail choice program, which allows data centers and other large load customers to purchase generation through third parties rather than through their incumbent electric utility. This also has the potential to shift generation costs to other customers if enough data centers "leave" their incumbent utility for retail choice.

Data center backup generators emit pollutants, but their use is minimal, and existing regulations largely curb adverse impacts

To ensure constant operations in the event of a power outage, nearly all data centers maintain diesel generators on-site for backup power. Diesel generators emit several harmful air pollutants, such as nitrogen oxides, carbon monoxide, and particulate matter. To limit potential emissions from backup generators, the Virginia Department of Environmental Quality (DEQ) permits limit when they can be run, how long they can be run, and the maximum annual emissions each permitted site is allowed. Nearly all current data centers use "Tier 2" diesel generators, which DEQ allows to run only in emergencies or as part of routine maintenance testing.

Data center generators are run mostly only for maintenance, and most data center operators interviewed by JLARC staff reported experiencing zero to two minor outages per site in the last two years, with nearly all outages lasting only a few hours. Consequently, data centers' diesel generators are a relatively small contributor to regional air pollution—in Northern Virginia, they make up less than 4 percent of regional emissions of nitrogen oxides and 0.1 percent or less of carbon monoxide and particulate matter emissions. While they make up only a small part of regional emissions, DEQ is conducting further study to ensure no harmful impacts occur locally. If the study detects any local air quality impacts, DEQ has the authority to increase protections as needed.

Data center water use is currently sustainable, but use is growing and could be better managed

Data centers require industrial-scale cooling, which is sometimes dependent on water, to manage the heat generated by their computing equipment. Most data centers use about the same amount of water or less as an average large office building, although a few require substantially more, and some require less than a typical household. The amount of water a data center uses depends on its size, computing density, and type of cooling system.

Most data centers receive their water from local water utilities, which make withdrawals from Virginia's water sources (rivers, groundwater). DEQ regulates water withdrawals, including requiring permits for large-scale withdrawals, to protect future water availability and environmental sustainability. However, while DEQ is responsible for ensuring water sustainability, there is less oversight over how available water should be shared across various uses in a locality. Virginia as a whole is relatively water rich, but water is more limited for some localities that do not have access to large amounts of surface water and are in groundwater management areas.

Localities have allowed data centers to be built near neighborhoods, but some localities are taking steps to minimize residential impacts

The industrial scale of data centers makes them largely incompatible with residential uses. One-third of data centers are currently located near residential areas, and industry trends make future residential impacts more likely.

Inadequate local planning and zoning have allowed some data centers to be located near residential areas, which sometimes causes impacts on those residents. In some cases, this occurred because local zoning ordinances did not consider data centers to be an industrial use. In addition, some localities have zoned industrial areas next to residential areas, even though land use principles state that industrial uses and residential uses should not be zoned next to each other. Local elected officials have also granted data centers exceptions that led to adverse residential impacts, such as approving rezonings that would allow data centers next to sensitive locations.

In response to increased residential opposition, some localities have taken steps to minimize the residential impacts of data centers. The three Virginia localities with the largest data center markets have taken or are considering changes to zoning ordinances to better manage future data center development, and several localities considering their first data center projects are proactively implementing planning and zoning changes to promote appropriate industry development. The effectiveness of local efforts to minimize residential impacts ultimately depends on the decisions of local elected officials when considering more restrictive zoning ordinances or individual special permit or rezoning requests.

Data center noise near residential areas presents unique challenges, and some localities are unsure about their authority to address it

The constant nature of data center noise has sometimes been a problem when data centers are located near residential areas. Data centers emit low-frequency noise that is not loud enough to damage nearby residents' hearing and rarely loud enough to violate noise ordinances. However, some nearby residents report that the constant noise generated by some data centers affects their well-being. Although noise has been a problem for some data centers, a large majority of data centers do not generate noise complaints because of their location or design.

Localities traditionally use noise ordinances to address noise concerns, but those typically target excessively loud noise from short-term sources, such as parties and barking dogs, and carry a low maximum civil penalty of \$500. Noise restrictions for data centers could be more effective if included in zoning ordinances instead, but some localities were uncertain whether they have the authority to establish these restrictions in such ordinances. Zoning ordinances that establish maximum allowable sound levels for both new and existing data centers would allow localities to better account for the low-frequency noise data centers emit, prescribe a better process for measuring potential noise violations, and impose more effective penalties for addressing any violations.

Some data center companies are conducting sound modeling studies *before* building data centers, but not all Virginia localities currently require this, and some were unsure whether they had the authority to do so.

Changes to the state's data center sales tax exemption could address some policy concerns related to the industry

Since 2010, Virginia has offered an exemption to the state's retail sales and use tax to attract large-scale data centers. The exemption allows data centers and their tenants to purchase computers and other equipment, such as servers, network infrastructure, cooling equipment, and generators, without paying sales tax. Because data centers are capital intensive, the exemption is valuable to the industry (providing \$928 million in tax savings in FY23), and about 90 percent of the industry uses the exemption. Data center companies report the exemption is an important factor when deciding where to locate and expand, and most of the other states that Virginia competes with for new data center developments have similar exemptions.

Because the data center exemption is a valuable incentive and used by most of the industry, it could be used to incentivize data centers to take actions to address many of the issues discussed throughout this report. There are a range of changes that could be made to the exemption, depending on the General Assembly's policy objectives.

Extend the exemption to maintain industry growth — If the General Assembly wishes to maintain data center industry growth in Virginia and the associated economic and local tax revenue benefits, it could extend the exemption. The exemption is scheduled to expire in 2035, and data center representatives unanimously reported

that expiration of the exemption would negatively affect the state's ability to attract new data centers and keep existing ones. Data center companies typically consider the cost of ownership over a 15- to 20-year period when making location decisions, so to influence future site selection decisions, an extension would need to be in place well before 2035.

Allow the exemption to expire to reduce industry growth and associated energy impacts — If the General Assembly wishes to slow the data center industry's growth in Virginia because it determines that energy impacts, including increasing costs to residential and other customers, outweigh the industry's economic benefits, it could allow the exemption to expire in 2035. While the General Assembly could allow the exemption to expire only in certain regions, like Northern Virginia, that approach would be less effective in reducing overall growth in energy demand because significant growth is occurring in several counties outside of Northern Virginia and is expected to continue.

Change the exemption to balance industry growth and energy impacts — Rather than choosing between economic benefits or reduced energy impacts, the exemption could be changed to try to balance these competing impacts. The General Assembly could allow the full exemption to expire in 2035 (or end it before then) and apply a partial sales tax exemption until 2050. A partial exemption would also better align the economic benefits the state receives with the value of the exemption. Most economic benefits occur during construction, and switching to a partial exemption in 2035 would reduce the value of the exemption in later years when the economic impacts of current and planned data centers could be expected to slow. A partial exemption could also generate more tax revenue for the state.

Use the exemption to address other policy concerns related to the data center industry — If the General Assembly extends the exemption, even as a partial exemption, there are several additional options the General Assembly could implement to address concerns in specific policy areas. The exemption could be modified to address energy, natural resource, historic resource, and residential impacts.

WHAT WE RECOMMEND

This report includes multiple policy options for the General Assembly to consider depending on its policy goals for the data center industry in Virginia. The report also includes several recommendations. The following recommendations include only those highlighted in the report summary. The complete list of recommendations and options is available on page xi.

Legislative action

- Clarify that electric utilities have the authority to delay, but not deny, service to customers when the addition of customer load cannot be supported;

- Direct Dominion Energy to develop a plan for addressing the risk of infrastructure costs being stranded with existing customers, and file that plan with the State Corporation Commission;
- Expressly authorize local governments to require and consider water use estimates for proposed data center developments;
- Expressly authorize local governments to require sound modeling studies for proposed data center developments; and
- Expressly authorize local governments to establish and enforce maximum allowable sound levels for operational data center facilities using alternative low frequency metrics and zoning ordinances.

Executive action

- The Virginia Economic Development Partnership should clarify that grants under the Virginia Business Ready Sites Program can be used for potential data center sites.

Recommendations and Policy Options: Data Centers in Virginia

JLARC staff typically make recommendations to address findings during reviews. Staff also sometimes propose policy options rather than recommendations. The three most common reasons staff propose policy options rather than recommendations are: (1) the action proposed is a policy judgment best made by the General Assembly or other elected officials, (2) the evidence indicates that addressing a report finding is not necessarily required, but doing so could be beneficial, or (3) there are multiple ways in which a report finding could be addressed and there is insufficient evidence of a single best way to address the finding.

Recommendations

RECOMMENDATION 1

The Virginia Economic Development Partnership should clarify in site characterization and development guidelines that potential data center sites are eligible for grants under the Virginia Business Ready Sites Program. (Chapter 2)

RECOMMENDATION 2

The General Assembly may wish to consider amending the Code of Virginia to clarify that electric utilities have the authority to delay, but not deny, service to customers when the addition of customer load cannot be supported by the transmission system or available generation capacity. (Chapter 3)

RECOMMENDATION 3

The General Assembly may wish to consider amending the Code of Virginia to expand the Accelerated Renewable Buyers program, which allows large customers of energy utilities to claim credit for purchases of solar and wind *energy* to offset certain utility charges, to also allow customers to claim partial credit for purchases of *capacity* from battery energy storage systems based on the current PJM electric load carrying capacity rating. (Chapter 3)

RECOMMENDATION 4

The General Assembly may wish to consider amending the Code of Virginia to require that utilities establish a demand response program for large data center customers and to require that these customers participate in the program. (Chapter 3)

RECOMMENDATION 5

The General Assembly may wish to consider amending the Code of Virginia to direct Dominion Energy to develop a plan for addressing the risk of generation and transmission infrastructure costs being stranded with existing customers and file that plan with the State Corporation Commission as part of its biennial rate review filing or as a separate filing. (Chapter 4)

RECOMMENDATION 6

The General Assembly may wish to consider amending the Code of Virginia to expressly authorize local governments to (i) require proposed data center developments to submit water use estimates and (ii) consider water use when making rezoning and special use permit decisions related to data center development. (Chapter 5)

RECOMMENDATION 7

The General Assembly may wish to consider amending the Code of Virginia to expressly authorize local governments to require sound modeling studies for data center development projects prior to project approval. (Chapter 6)

RECOMMENDATION 8

The General Assembly may wish to consider amending the Code of Virginia to expressly authorize local governments to establish and enforce maximum allowable sound levels for data center facilities, including (i) using alternative low frequency noise metrics and (ii) setting noise rules and enforcement mechanisms in their zoning ordinances, separate from existing noise ordinances. (Chapter 6)

Policy Options to Consider

POLICY OPTION 1

The General Assembly could consider amending the Code of Virginia to require that, as a condition of receiving the sales tax exemption, data center companies meet and certify to an energy management standard, such as the International Organization for Standardization's 50001 standard for energy management. (Chapter 3)

POLICY OPTION 2

The General Assembly could consider amending the Code of Virginia to allow electric cooperatives to create for-profit subsidiary companies that could fulfill their legal obligation to provide energy services (retail sales) to customers with load capacity of over 90 MW. (Chapter 4)

POLICY OPTION 3

The General Assembly could consider amending the Code of Virginia to require that electric utilities establish caps on participation in retail choice that protect ratepayers from undue costs, and that such caps be approved by the State Corporation Commission through a formal case process. (Chapter 4)

POLICY OPTION 4

The General Assembly could amend the Code of Virginia to require that, as a condition of receiving the data center sales and use tax exemption, all new data center developments in the Northern Virginia Ozone Nonattainment Area use only Tier 4 generators, Tier 2 generators with selective catalytic reduction systems, or generators with equivalent or lower emission rates. (Chapter 5)

POLICY OPTION 5

The General Assembly could amend the Code of Virginia to require that, as a condition of receiving the sales and use tax exemption, data center companies meet and certify to an environmental management standard, such as the International Organization for Standardization's 14001 standard for Environmental Management Systems. (Chapter 5)

POLICY OPTION 6

The General Assembly could amend the Code of Virginia to require that, as a condition for receiving the sales and use tax exemption, data center companies conduct a Phase I historic resource study of a proposed development site, as well as a viewshed analysis when a proposed site is located within a certain distance of a registered historic site, and report the study findings to the appropriate locality prior to development. (Chapter 5)

POLICY OPTION 7

The General Assembly could amend the Code of Virginia to require that, as a condition for receiving the sales and use tax exemption, data center companies conduct a sound modeling study prior to the development of a proposed data center that is to be located within a certain distance of a residential development or area zoned for residential development and provide the study findings to the appropriate locality. (Chapter 6)

POLICY OPTION 8

The General Assembly could amend the Code of Virginia to extend the expiration date for the state's sales and use tax exemption for data centers from 2035 to 2050. (Chapter 7)

POLICY OPTION 9

The General Assembly could allow the sales and use tax exemption for data centers to expire in 2035. (Chapter 7)

POLICY OPTION 10

The General Assembly could amend the Code of Virginia to extend a partial sales and use tax exemption for data centers from 2035 to 2050. (Chapter 7)

1 Overview of the Data Center Industry

In 2023, the Joint Legislative Audit and Review Commission (JLARC) directed its staff to review the impacts of the data center industry in Virginia. Specifically, staff were directed to assess the impact of the industry on state and local revenue; Virginia’s energy demand and supply; natural, historic, and cultural resources; and local residents. Staff were also directed to forecast future growth of the industry in Virginia and determine (i) how any economic benefits could be more widely distributed and (ii) if Virginia’s data center tax exemption could be improved. (See Appendix A for the study resolution.)

To complete this study, JLARC staff conducted over 250 interviews with more than 150 different stakeholders, including local residents and stakeholder groups; data center companies and developers; state and local officials; electric and water utility companies; and subject-matter experts. Staff analyzed water usage and air quality and emissions data, as well as capital expenditure, employment, and tax benefit data from users of the data center tax exemption. Staff also reviewed state and local land use regulations and conducted case reviews of local data center-related zoning and permitting requests. (See Appendix B for more information on methods used for this study.)

JLARC staff contracted with two consultants as part of this study. Faculty from the Weldon Cooper Center for Public Service at the University of Virginia (Weldon Cooper Center) developed an economic impact analysis of Virginia’s data center industry and an independent energy demand forecast for Virginia and its utilities. Consulting firm Energy + Environmental Economics (E3) modeled how data center growth was likely to affect future generation and transmission needs, carbon emissions, and utility costs, including how costs could be passed on to ratepayers. E3 also made additional refinements to the Weldon Cooper Center energy demand forecast.

Data centers are key hubs of the world’s digital infrastructure

Data centers are specialized facilities that manage, process, and share large amounts of data. They enable the digital services that people rely on daily, including websites, electronic applications, and cloud-based platforms such as email and media streaming. These services are also critical to businesses and organizations, for example, allowing businesses to make secure transactions electronically or conduct complex computing tasks using artificial intelligence (AI). Given their essential role in daily life, business, and the economy, data centers have become a critical part of the world’s digital infrastructure (sidebar).

Digital infrastructure encompasses the systems and technologies needed for the internet, online services, and other digital activities to function. This includes networks (e.g., fiber, switches), hardware (e.g., computers, servers), software (e.g., operating systems, applications), data centers, and the personnel who manage and maintain these components.

A typical, modern data center is a large industrial building filled with computing equipment, including servers, storage drives, and network hardware. Externally, these buildings often resemble warehouses or distribution centers. Data centers can vary greatly in size, ranging from smaller facilities with a few thousand square feet to large, multi-story buildings exceeding one million square feet. Data centers are often located on campuses alongside other facilities or other data centers operated by the same company. In addition, many data centers have physical security measures, such as floodlights, fencing, and access controls, to protect the facility and its data.

Megawatts are units used to measure power, equivalent to one million watts. Megawatts measure the amount of energy produced or consumed at any instant, rather than total over time. A different unit of measure is used to measure the amount of energy produced or consumed over a given time period. For example, megawatt-hours describe the number of megawatts produced or consumed during an hour.

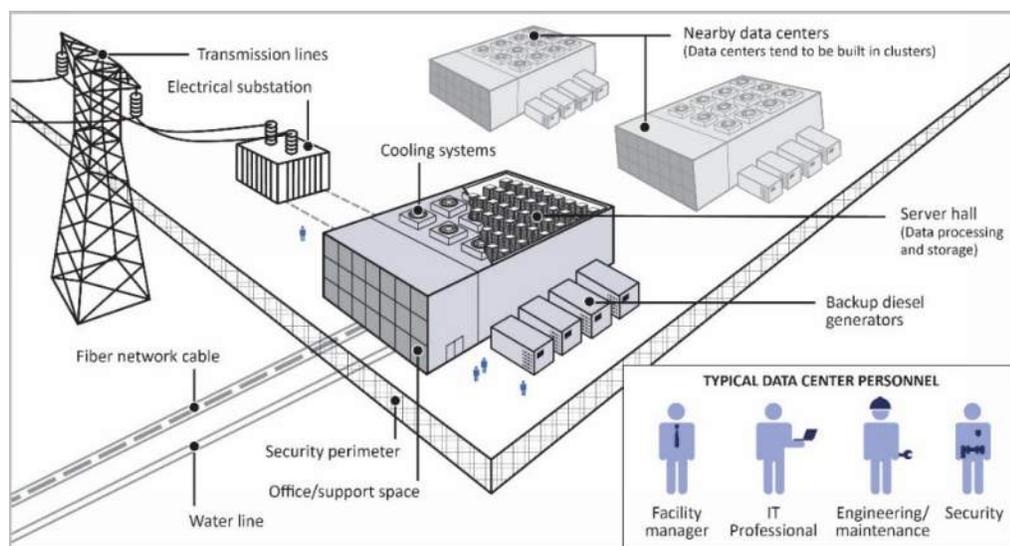
For context, a Virginia town of 10,000 people uses approximately 10 megawatts.

Data centers require large amounts of electricity to operate. This energy powers the computing equipment inside, as well as cooling equipment that prevents the computing equipment and building from overheating. The amount of electricity needed for a data center varies based on its size, the density and type of computing equipment, and the cooling system used. A small data center can require five to 20 megawatts of power, while a larger data center can require 100 or more megawatts (sidebar). Given the amount of electricity needed for operations, data centers often have power lines and substations connecting them directly to nearby high-voltage transmission lines. All data centers also have backup generators on-site to ensure continuity of operations if their primary power supply fails.

Data centers are operated and maintained by a skilled workforce, including technicians, electricians, and network engineers. Data centers also generally have security personnel.

Figure 1-1 illustrates the infrastructure, equipment, and personnel found in and around a typical, modern data center.

FIGURE 1-1
Common infrastructure, equipment, and personnel at a typical data center



SOURCE: JLARC staff.

NOTE: Illustrative example. Data centers may have different equipment, e.g., based on their cooling system.

There are various types of data centers, ranging from traditional enterprise and colocation facilities to newer hyperscale operations.

- Enterprise data centers are private facilities owned and operated by a single company, designed specifically to meet that company's IT and data storage needs. These are generally non-technology companies, such as banks, insurance firms, and credit card companies, that rely heavily on secure, in-house data processing and storage. Enterprise data centers are generally located on-site, such as within a corporate campus or integrated into a larger office building. Enterprise data centers are a shrinking segment of the data center market as companies increasingly rely on the cloud for their computing needs.
- Colocation data centers are facilities owned and operated by a company that leases physical space within their data center to other companies and organizations. These tenants, which include smaller technology companies, online retailers, and government agencies, house their computer equipment within their leased space and have their own staff who maintain and upgrade this equipment. Tenants rely on the data center owner to provide all other services such as power, cooling, and physical security. Colocation data centers generally serve multiple tenants—often upwards of 20 or more—which allows these companies to benefit from economies of scale.
- Hyperscale data centers are purpose-built facilities designed to serve the world's major technology companies (e.g., Amazon Web Services [AWS], Google, Meta, Microsoft), often known as “hyperscalers.” These are the largest data centers with the largest operational capacity and power requirements (sidebar). Hyperscale data centers can either be owned and operated by the hyperscaler company or by a third-party that leases the facility to the hyperscaler. In some cases, the third party that owns the data center also provides services such as power, cooling, and security, while in others the hyperscaler manages all building operations. Hyperscale data centers are a growing segment of the data center market.

Operational capacity—also called “capacity”—refers to the amount of power a data center needs to operate. This includes all the power needed to run the computing equipment, cooling systems, and other building operations. Capacity is often used to describe the size of a data center. For the purposes of this chapter, capacity is measured in megawatts.

The time it takes for data to travel from one point to another, such as from a data center to the end user, is called “**latency**.” Low latency indicates data is traveling more quickly; high latency indicates there is a longer delay. Many factors affect latency, most notably the geographic distance between the data center and user. Some tasks—such as financial transactions—are more “latency sensitive” than others, meaning they require as low latency as possible.

Data center industry is growing rapidly, driven by a combination of established and emerging trends

The data center industry spans markets around the world, clustering in locations that provide access to land, energy, and fiber, and are business friendly, politically stable, and at low risk from natural disasters. Many data center markets are located near key population, business, and government centers because they are close to their customers and end users. Being in proximity to customers reduces the time it takes for data to travel between the data center and the customer, ensuring fast processing, which can be critical for certain business operations, such as financial transactions (sidebar).

It also reduces time for end users to access data, which, for example, reduces buffering times and increases picture quality when streaming media.

The data center industry is dominated by a few large participants. In the U.S., four hyperscaler companies—AWS, Google, Meta, and Microsoft—are responsible for much of the data center industry. These companies operate their own hyperscale data centers, lease other hyperscale data centers, and can also be customers within traditional colocation data centers.

Data center industry is growing rapidly worldwide

The data center industry is growing worldwide, with many data centers under construction or in development. Market reports and trade literature indicate the industry has grown significantly over the past decade, with an especially rapid growth rate in recent years, particularly in the Americas. For example, a 2024 report from the real estate firm Cushman & Wakefield estimates 44,600 megawatts of data center capacity is in development worldwide. More than half (55 percent) of this capacity is in the Americas region, 30 percent is in the Asia–Pacific region, and the remaining 15 percent is in the Europe, Middle East, and Africa (EMEA) region. When completed, this growth would double existing capacity across the EMEA markets and more than double existing capacity in the Americas and Asia–Pacific markets.

The industry is growing both in terms of the number of data centers under construction as well as the size and scale of those data centers. More data centers are being built, and many of the new data centers under construction are larger and have more operational capacity. For example, the capacity of a typical data center has increased from requiring only a few megawatts of power to more than 100 megawatts.

There has also been a recent shift toward companies building data center *campuses*, rather than individual data centers, to serve the needs of hyperscalers. Such campuses can be made up of multiple parcels of land and house several data centers owned by the same entity. Collectively, the operational capacity of these campuses can reach hundreds of megawatts, and in some cases, exceed one gigawatt (i.e., 1,000 megawatts). Companies are increasingly developing data center campuses, rather than individual facilities, to consolidate operations, improve efficiency, and more easily expand capacity in response to growing demand.

Industry expected to grow for foreseeable future, though factors could shift where growth occurs

The data center industry is expected to keep growing, driven by demand for digital services, such as e-commerce, media streaming, and cloud-based applications. This trend accelerated during the COVID-19 pandemic as more people and businesses relied on these services and is expected to continue. As the economy becomes increasingly digitized, more consumers use digital services, and the number of internet-

connected devices rises, the need for data storage, processing, and network capacity will continue to grow.

The recent emergence of AI is another significant driver of data center growth. AI applications, such as machine learning and data analytics, require immense computing power and storage to process large amounts of data. As businesses increasingly adopt AI tools, and AI is integrated into commercial applications, the demand for data centers to support these technologies has surged and is expected to continue to grow.

AI also has the potential to reshape how and where the data center industry grows. For example, some AI workloads, such as large language model training, are not latency sensitive, allowing data centers housing these tasks to be located farther from established data center markets. Additionally, AI workloads are often much larger than typical data center demands, requiring larger facilities with more computing capacity and more power needs (sidebar).

Market constraints could also shift where the industry grows. Key factors, such as power availability, land price and availability, local opposition, and regulatory environments, are constraining the industry, especially in established markets. As these constraints grow, some markets may become less attractive for development, driving data center growth toward other locations.

AI workloads typically require more power than traditional data center tasks because they use more energy-intensive hardware. The servers conducting AI tasks often include graphics processing units (GPUs) alongside central processing units (CPUs), because GPUs are better suited to running large, simultaneous data processes required for AI applications. Since GPUs consume more power than CPUs, AI tasks are generally more energy demanding.

Northern Virginia has the largest data center market in the world, and the state's industry is growing

There are approximately 150 data center sites in Virginia, which collectively house around 340 data center buildings. These sites vary in size, ranging from a single 2,400-square-foot data center building to a campus of seven buildings that total more than 3 million square feet. In total, Virginia has over 63 million square feet of data center space on 7,200 acres of land (sidebar).

Virginia data center sites also vary in size in terms of operational capacity. The smallest sites require only about one megawatt of power, while some larger campuses are estimated to need 200 or more megawatts and are still growing. In total, Virginia data center sites use approximately 5,050 megawatts of power (sidebar). (This is based on the 2024 peak load forecast by Dominion Energy and Mecklenburg, Northern Virginia, and Rappahannock electric cooperatives in August 2023.)

For context, **Pocahontas State Park—the largest in Virginia—covers 7,600 acres.** The entire state park system spans a total of 75,900 acres.

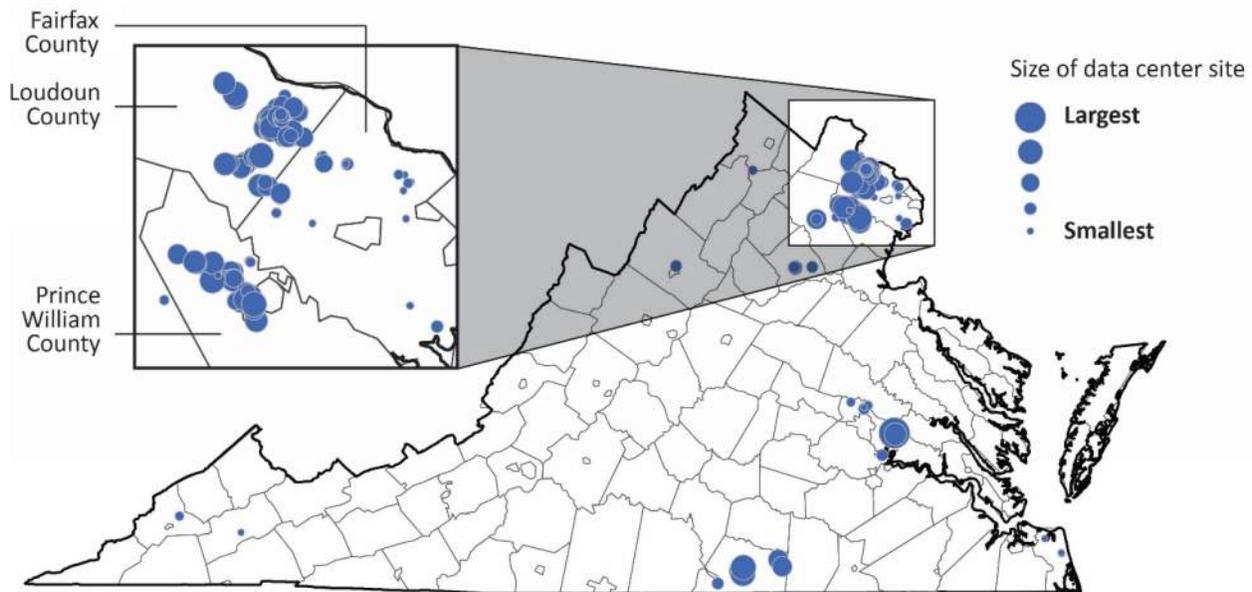
Virginia's data center industry is mostly concentrated in Northern Virginia, with other small clusters near Richmond and Mecklenburg

Data centers are located across the state, but 80 percent of Virginia's data center industry is concentrated in three Northern Virginia localities: Loudoun, Prince William, and Fairfax (Figure 1-2). Loudoun County alone accounts for approximately half of the state's data center industry in terms of number of sites, building square footage, and estimated energy usage. The eastern part of the county north of Dulles

Data centers' power usage in Virginia—about 5,050 megawatts—is roughly **equivalent to the electricity needs of 2 million Virginia households** (about 60 percent of households in the state).

International Airport has become known as “Data Center Alley” because of its high concentration of data centers. The remaining 20 percent of Virginia’s data center sites are in 11 other localities, with the most notable clusters in the Richmond region and Mecklenburg County.

FIGURE 1-2
Most of Virginia’s data center industry is concentrated in Northern Virginia



SOURCE: JLARC analysis of Virginia Department of Environmental Quality data and county property real estate records.

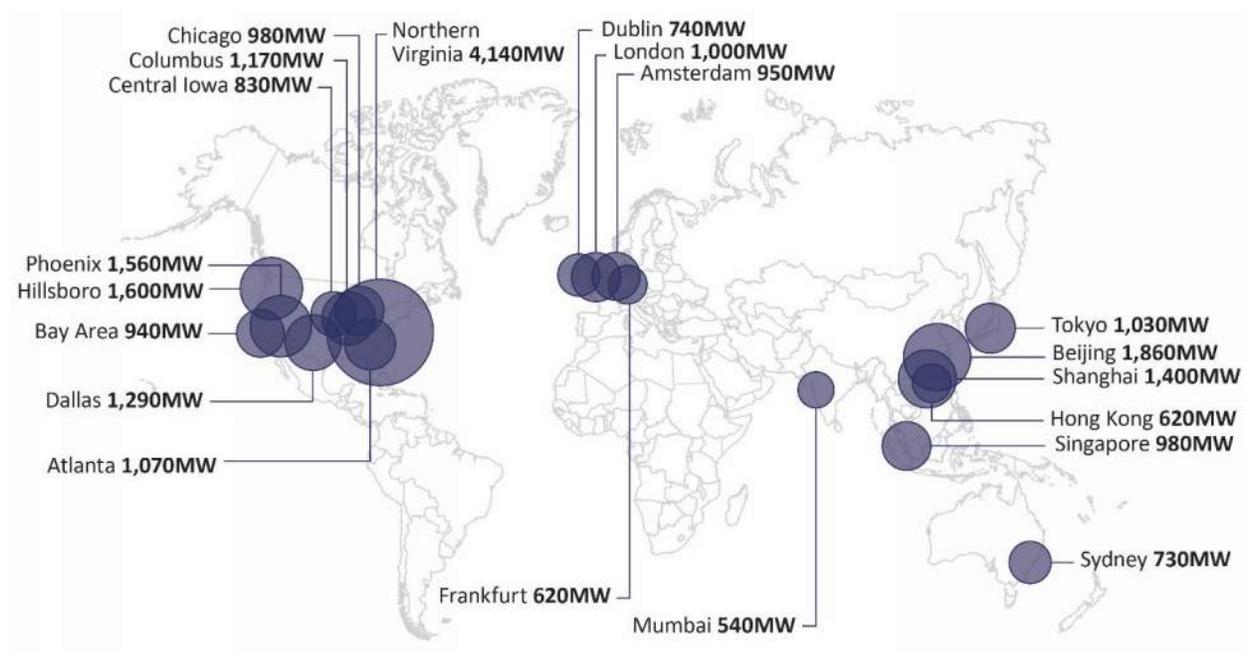
NOTE: Map shows one dot per data center site, which may include multiple data center buildings. Size of each site represented by size of dot, as measured by the maximum capacity (in terms of megawatts) the site is permitted to backup via diesel generators. This capacity is larger than the current operational capacity because it (i) accounts for the site's full build-out potential, which many sites have not yet reached, and (ii) includes allowances for redundancy. Data center operators report 0 to 25 percent of backup capacity is typically for redundancy.

Northern Virginia is the largest data center market in the world because of multiple factors

Northern Virginia has the highest concentration of data centers in the world and is recognized as the world’s premier data center market. The exact size of the Northern Virginia data center market (in terms of the number of sites and energy demand) varies based on the sources used; however, every source indicates Northern Virginia is the global leader. According to data reported by Cushman & Wakefield, in terms of megawatts, the Northern Virginia market is more than twice the size of the next largest market in the world, Beijing, and nearly three times the size of the next largest market in the U.S., located in and around Hillsboro, Oregon (Figure 1-3). The Northern Virginia market constitutes 13 percent of all reported data center operational capacity globally and 25 percent of capacity in the Americas region.

FIGURE 1-3

Virginia has the most operational capacity of all global markets



SOURCE: JLARC analysis of Cushman & Wakefield 2024 Global Data Center Market Comparison.

NOTE: Reflects market size in terms of operational capacity as measured by megawatts. Shows 20 largest markets. "Northern Virginia" refers to an estimate of data center capacity in the traditional Northern Virginia market consisting of Fairfax, Loudoun, and Prince William counties and Manassas. The Cushman & Wakefield report also includes an estimated 560 megawatts of capacity in Culpeper and Fauquier counties and the Richmond metropolitan region.

Multiple factors have contributed to Northern Virginia's market prominence. The region's role in the early stages of the internet's development gave it a head start as a key data center hub. In the mid-20th century, early data processing companies contracting with government agencies and high-technology government labs were drawn to the region given its proximity to their federal government customers. The establishment of an internet exchange point in the 1990s further attracted major telecommunications and early internet companies to the region.

As the internet grew, a strong fiber network, supply of reliable cheap energy, and available land encouraged more data centers to locate in the region. Data centers were also drawn to the region given its proximity to major national customers, including most notably the federal government, government contractors, and technology firms that held an enormous amount of government and other data. With the rapid growth of the internet in the 2000s, it became advantageous for data centers to cluster near each other so they could share information more quickly. The high concentration of data centers also led to a burgeoning ecosystem of industry professionals, real estate developers, construction companies, and tradespeople with expertise in data centers, which continues to make the region attractive today.

The creation of a state data center tax incentive has also been a key factor in the industry's development in Northern Virginia, as well as the state more broadly. In 2010, Virginia adopted a sales and use tax exemption that exempted data centers from paying retail sales tax on computer and related equipment purchases, and the General Assembly has since expanded the exemption. (See Chapter 2 for more information about the sales and use tax exemption and its impact.)

Data center industry is growing rapidly in Virginia, both in established markets and newer ones

The data center industry is growing rapidly in Virginia. Since 2020, data center *space* in Virginia has more than doubled, with over a quarter of the state's existing data center square footage built in 2022 and 2023. Additional square footage has been built in 2024. A 2024 Cushman & Wakefield report underscores this trend, noting there is a record amount of data center *capacity* in development in the state. This includes 1,500 megawatts under construction and 2,900 megawatts in earlier stages of development. When this development is complete, it will nearly double the size of data center capacity in Virginia.

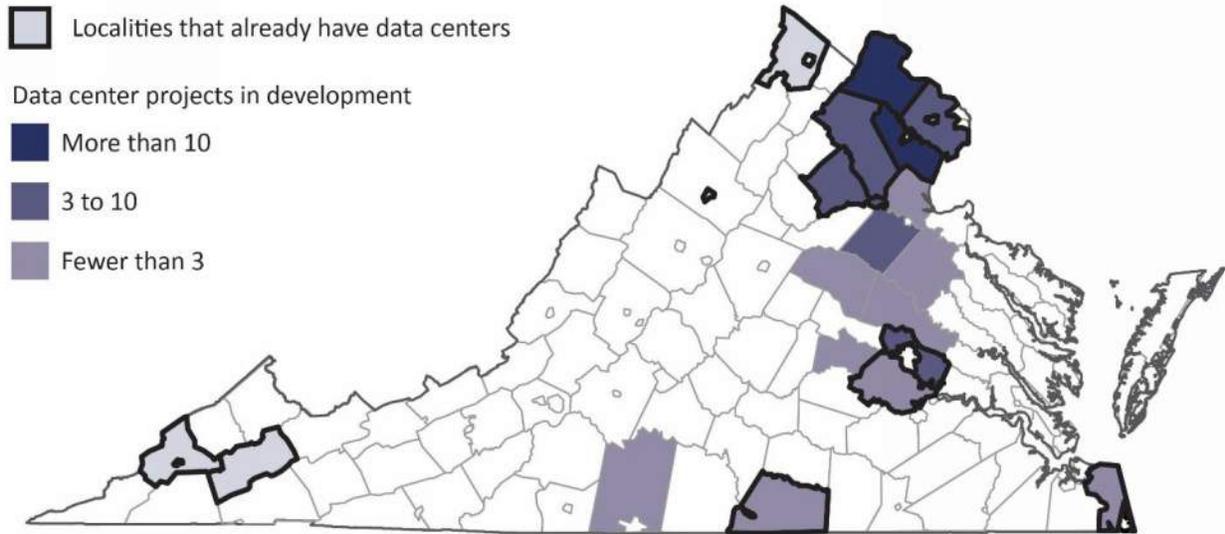
As of September 2024, there are at least 70 new known data center sites under active development across the state. These projects are at various stages of the development process, with more than half having received full local government approval and/or are under construction. The remaining projects are at earlier stages, such as awaiting local rezoning or approval.

Much of the data center development is occurring in the established markets of Northern Virginia, the Richmond region, and Mecklenburg County. Within these existing markets, the majority of growth continues to be in Loudoun and Prince William counties, with Prince William County being the fastest-growing locality (Figure 1-4). The growth in these markets is driven by data center developers and companies building at new sites as well as expanding existing campuses.

The data center industry is also growing in new Virginia markets, most notably in counties outside of the established Northern Virginia market and along the I-95 corridor (Figure 1-4). For example, seven localities without any data centers have recently approved new campuses or have applications pending. According to stakeholders, data center development is moving into these new markets as land availability and local regulatory environments become more challenging in Northern Virginia. Additionally, AWS is leading development into localities along I-95 as part of its agreement with the state to invest \$35 billion in data centers in new Virginia locations by 2040.

FIGURE 1-4

Data center industry still growing in established markets, but development starting to spread into new areas, such as along I-95



SOURCE: JLARC summary analysis as of September 2024.

NOTE: "In development" includes projects that are under construction, permitted, and/or have been approved through local rezoning or other approval processes (if applicable).

2 Economic and Fiscal Impacts

States strive to build and maintain a strong and diverse economy. A strong economy benefits the state by increasing the wealth of its citizens, helping its businesses succeed, and generating tax revenues to support state and local government operations. Tax revenues help pay for essential services like roads, schools, and public safety.

Virginia looks to improve its economy by attracting new businesses and having existing businesses expand their operations. Businesses benefit the economy directly by creating new jobs and making capital investments, such as constructing new buildings and purchasing vehicles and equipment. Business activities have many additional impacts that further economic growth, such as creating additional jobs at in-state suppliers and in the service industries that support the original business and its employees (Figure 2-1).

FIGURE 2-1
Businesses create jobs and capital investment and have additional impacts that benefit the state economy



SOURCE: JLARC staff analysis.

Data center industry provides positive economic benefits to state

State and local economic development agencies view data centers as an attractive industry. Data center companies are some of the largest and most well-resourced technology companies in the world. Though data centers directly employ relatively fewer employees than some industries, data center jobs tend to be higher paying, so jobs

Tradeable sector includes businesses that compete or export goods and services outside of where they are located. They have larger economic impacts because they bring in new revenue from outside the state instead of simply reallocating existing economic activity.

An **employment multiplier** is an estimate of the number of additional jobs created in the economy to support each job created directly by an industry.

have a higher economic impact. Data centers also meet other characteristics of a high impact industry: they are in a tradable industry sector and have a high employment multiplier (sidebar). Data centers—like manufacturers, steel producers, and transportation industries—are also capital intensive. Their facilities are enormous and require multibillion-dollar outlays for construction and equipment, which can provide substantial tax revenue for local governments and a comparatively smaller amount of tax revenue for the state (for the portion that is not tax-exempt).

The data center industry provides secondary economic benefits to the state as well. The clustering of data centers in a region, like Northern Virginia, can have “knock on” economic effects by indirectly attracting other related technology businesses, which help create a well-trained, regional IT workforce. This clustering of data centers, related businesses, and skilled workers can further improve the region’s attractiveness to additional businesses in the technology sector and other sectors.

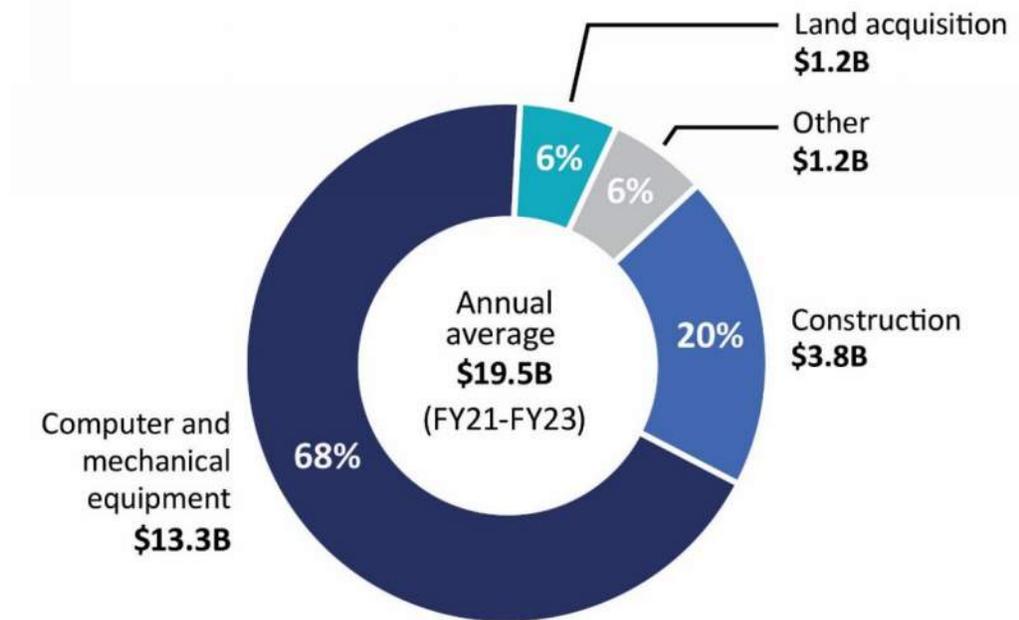
Data center capital investment is substantial, although only a portion of it benefits Virginia’s economy

Capital investment in Virginia data centers is substantial, exceeding \$24 billion in FY23, and primarily consists of equipment purchases from Virginia-based and out-of-state companies. Data center investment represented 84 percent of the total capital investment across all economic development projects announced by the Virginia Economic Development Partnership (VEDP) between FY22 and FY24. However, like capital investments made by other industries, only a portion of data center capital investment benefits the Virginia economy. The primary benefit to Virginia’s economy is related to data center construction, which comprises about 20 percent of total data center capital investment (Figure 2-2). Most construction spending likely remains in the state economy because much of it goes to Virginia-based businesses performing key construction services such as clearing and grading sites, erecting steel frames, installing high-voltage electrical equipment, installing industrial-scale cooling systems, and running miles of cable, conduit, and piping. Materials used in data center construction are often also sourced from Virginia businesses throughout the state.

The largest portion of data center capital investment is for IT and mechanical equipment (68 percent), and most of this spending occurs with out-of-state companies. Computer servers are the biggest equipment expense and, because there are no major computer server manufacturers in Virginia, are sourced from outside the state or the country. Some other equipment used in data centers is sourced in Virginia. For example, Virginia has suppliers of electrical and cooling equipment, raised-access floors and hot/cold aisle containment systems, and fiber infrastructure. These suppliers have recently located or expanded operations in Virginia because of the state’s large data center market. Even so, a substantial amount of non-computer equipment still likely comes from out-of-state, such as the diesel generators data centers use for backup power.

FIGURE 2-2

Primary benefit of data center capital investment to Virginia’s economy is from construction, which comprises 20 percent of data centers’ capital investment



SOURCE: JLARC staff and Weldon Cooper Center analysis of data center capital investment between FY21 and FY23 reported to VEDP.

Data center industry supports relatively small operations workforce and sizable construction workforce, both with average or above average wages

Data centers typically employ a small number of workers for data center operations, relative to their facility size. For example, several data center representatives indicated that a typical 250,000-square-foot data center may have approximately 50 full-time workers (one employee per 5,000 square feet versus one employee per 650 square feet for some distribution centers). About half of these workers are likely direct employees of the data center company (or for colocation data centers, direct employees of the tenant). These workers include facility managers, engineers, data technicians, and facility maintenance staff. The other half are contract workers, including electricians, pipefitters, and security personnel who work full-time at the facility (sidebar).

Data center direct employees and contract workers accounted for, by JLARC staff estimates, over 8,000 full-time jobs in FY23. A data center may add new jobs each year as new facilities begin and expand operations. In FY23, data centers added more than 800 new full-time jobs.

Data center construction, however, supports a substantially larger number of workers than data center operations. Construction of an individual data center building usually

Data centers require constant ongoing maintenance of electrical and cooling systems. Data centers have hundreds of electrical and mechanical components that must be replaced as they break down over time. Additionally, these systems can also be upgraded or configurations changed as computer equipment is upgraded and replaced.

takes about 12 to 18 months, and it can take five or more years to fully build out a campus. Data center representatives indicated that, at the height of construction, approximately 1,500 workers are on site building a facility and installing electrical and cooling systems and include occupations such as

- site developers and surveyors,
- equipment operators for land clearing and leveling,
- workers to erect steel building frames and concrete walls,
- electricians installing cabling, equipment, and generators, and
- pipefitters and HVAC technicians installing piping and cooling equipment.

Both data center operations and construction workers earn average or above average wages, contributing to the economic benefit of the industry. On average, data center employees and contractors earn about \$100,000 per year, varying based on job role and area of the state. Many construction-related jobs do not require a college degree but are also relatively high-paying. For example, the starting salary for electricians is approximately \$24 per hour, and a “journeyman” (fully trained) electrician can make approximately \$56 per hour. These wages translate to \$50,000 and \$116,000 in annual wages, respectively, but the actual annual wages are likely higher because these workers often work over 40 hours per week and can earn overtime pay.

The growth of Virginia’s data center industry has contributed to the expansion of the state’s trades and construction industry. A representative from a construction supplier and contractor indicated that the data center industry is the largest construction sector right now, and data center projects are about one-third to one-half of their current projects and nearly two-thirds of their backlog. A representative of an electrical workers union in Northern Virginia indicated that, because of demand from the growing data center industry, their apprenticeship program has grown from 300 apprentices per training course to 500 in the last several years and could grow larger. A benefit of this growth is that many workers are able to stay in-state and move to another data center construction job after a project is complete, rather than moving to another state to find work.

JLARC’s independent economic impact analysis was performed by staff from the Weldon Cooper Center. The analysis was conducted using economic modeling software developed by IMPLAN. The model uses an industry standard methodology but does not account for the cost of some potential externalities, such as health and environmental costs associated with increased carbon emissions, that may be associated with the industry’s large energy demands. See Appendix D for additional details.

Data center industry has added thousands of jobs and several billion dollars to state’s economy, mostly from construction

The data center industry benefits the Virginia economy because of the additional jobs and personal income created and the value it adds to the Virginia economy (i.e., Virginia gross domestic product or GDP). JLARC staff commissioned an independent economic impact analysis of the data center industry in Virginia (sidebar). The analysis estimated that the data center industry provides approximately 74,000 jobs, \$5.5 billion in labor income, and \$9.1 billion in Virginia GDP overall to the state economy annually, based on average spending by the industry between FY21 and FY23 (Table 2-1). These estimates are just over 1 percent of total statewide employment, income, and Virginia GDP during the last three years. Most of the economic benefits have been in

the Northern Virginia region, but other regions where data centers are located or under construction, or that have businesses that otherwise support the industry, also benefited (Figure 2-3).

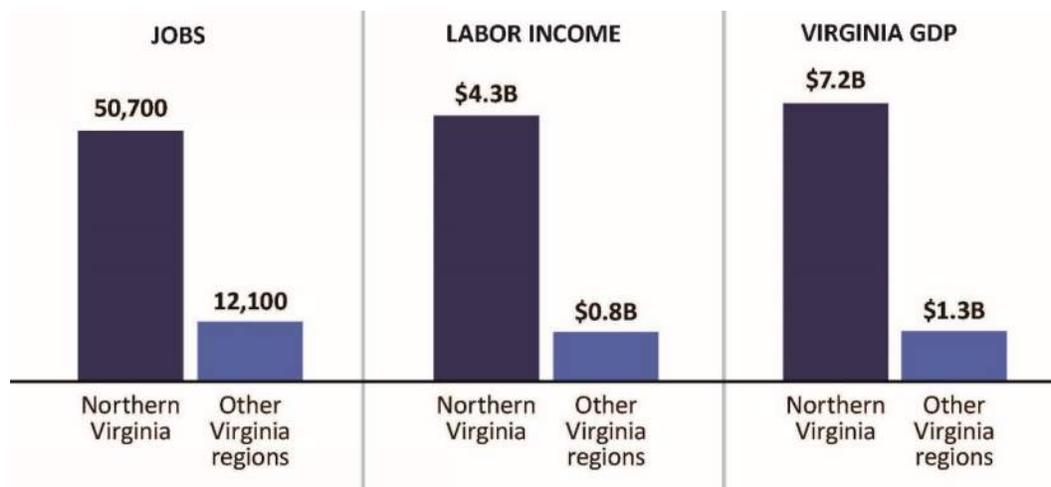
TABLE 2-1
Data center industry has positive economic benefits on Virginia

Economic impact	Annual average based on data center capital investment and related operation spending		
	Construction phase	Operations phase	Total impact
Jobs	59,000 jobs <i>(35,000 direct)</i>	15,000 jobs <i>(4,400 direct)</i>	74,000 jobs <i>(39,400 direct)</i>
Labor income	\$4.3 B <i>(\$2.6 B direct)</i>	\$1.2 B <i>(\$0.4 B direct)</i>	\$5.5 B <i>(\$3.1 B direct)</i>
Virginia GDP	\$6.4 B <i>(\$3.3 B direct)</i>	\$2.7 B <i>(\$1.1 B direct)</i>	\$9.1 B <i>(\$4.4 B direct)</i>

SOURCE: Weldon Cooper Center economic impact analysis of the data center industry impacts, based on data center spending between FY21 and FY23 reported to VEDP, adjusted to account for non-exempt data centers. Numbers may not sum because of rounding.

NOTE: Direct operations jobs include only data center employees and exclude contractors that work full time at data centers. Total impact includes direct impacts plus indirect and induced impacts. Average data center economic impacts presented here likely underestimate the impacts in more recent years given the growth of the industry.

FIGURE 2-3
Economic impact from data centers is concentrated in Northern Virginia



SOURCE: Weldon Cooper Center economic analysis of the annual data center industry impacts, based on data center spending between FY21 and FY23 reported to VEDP, adjusted to account for non-exempt data centers.

NOTE: Totals for Northern Virginia and other Virginia regions do not sum to statewide totals shown in Table 2-1 because the analysis does not account for impacts from activity in Northern Virginia occurring in other Virginia regions and vice versa.

Much of the data center industry’s economic benefits in Virginia derive from capital spending during the construction phase rather than spending during ongoing operations (Table 2-1). Annual average spending during the construction phase is estimated

to be more than three times annual operation spending, according to prior research. Data centers were estimated to contribute 59,000 jobs annually during the construction phase, accounting for 80 percent of total annual jobs resulting from data centers. This estimate includes 35,000 direct jobs, most of which were construction workers (28,000), although some were IT-related workers manufacturing and installing equipment (7,000). Another 24,000 jobs were estimated to be in supporting sectors, such as materials suppliers, and “induced jobs” in businesses that benefit from worker spending, such as restaurants and retail. The data center construction phase also accounted for most of the annual increase in total labor income (80 percent) and total Virginia GDP (70 percent) from data centers. Appendix D provides additional technical details on these and other analysis outcomes.

Because most of data centers’ economic benefits are from construction, continued growth of the data center industry would be needed in Virginia to maintain the same level of economic impact. Current trends suggest continued growth is likely to happen, at least for the near future. Virginia’s data center market is expected to double in the next few years based on the data center capacity currently under construction and in the early development stages.

Data centers generate substantial local tax revenues for localities that have them

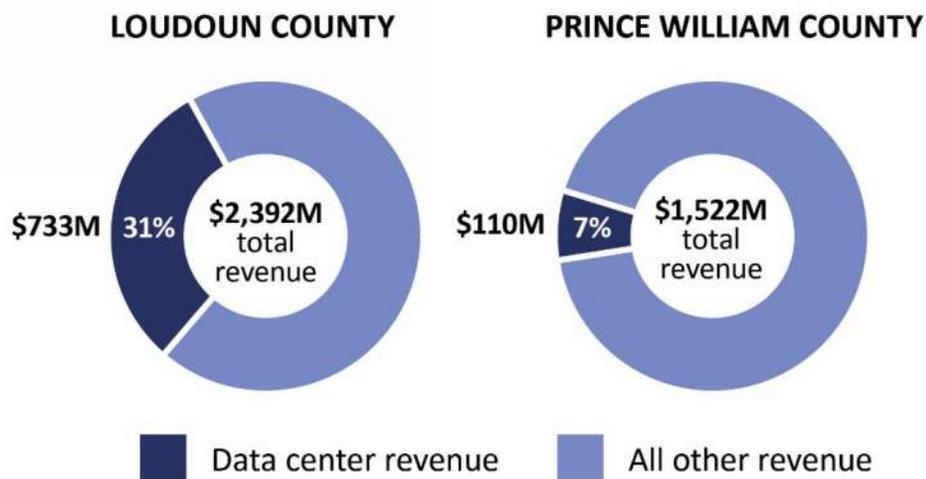
Business personal property taxes are levied by local governments on the value of property, such as furniture, fixtures, computer equipment, machinery, tools, and heavy equipment within their locality. State law allows a locality to tax certain classes of personal property at lower rates, including computer equipment for data processing.

Real property (or real estate) taxes are levied by a local government on land and improvements in their locality.

Local governments with data centers in their jurisdictions can collect substantial tax revenues from the industry. Data centers pay different types of local taxes, but the primary ones are business personal property and real property (real estate) taxes (sidebar). The business property tax, in particular, can generate substantial revenue. A single data center typically has business personal property valued in the millions, a large portion of which is computer equipment that is typically replaced every five years.

Although data center tax revenues can be substantial, the industry’s share of local revenue varies. For the five localities with relatively mature data center markets (Loudoun, Prince William, Mecklenburg, Henrico, and Fairfax), data center revenue ranged from less than 1 percent to 31 percent of total local revenue. The amounts collected and percentage of local revenues vary substantially because of differences in the size and maturity of the data center markets, locality sizes and tax bases, and local tax rates and depreciation schedules. Loudoun and Prince William have the largest and most mature markets, and data center revenue accounted for 31 percent and 7 percent, respectively, of total local tax revenue (Figure 2-4). Loudoun collects substantially more revenue from data centers primarily because its data center market size is three times larger than Prince William’s. Revenue estimates are not provided for all of these localities to protect taxpayer confidentiality.

FIGURE 2-4
Data center tax revenue can be substantial for local governments (FY23)



SOURCE: JLARC staff analysis of revenue collections from localities and the APA Local Government Comparative Report, FY23.

Tax rates also significantly affect the amount of revenue a locality can generate from data center developments. Some localities have greatly reduced their business personal property tax rates for computer equipment to try to attract the industry and, therefore, collect far less revenue than other localities with a higher tax rate would collect for a comparable project. For example, assuming a data center with \$150 million in taxable computer equipment, counties could collect from \$10.8 million to \$0.4 million over a five-year period (after accounting for different tax rates and depreciation schedules) (Figure 2-5).

Even with the variation in tax revenue collections, local government staff from the five counties with the greatest data center presence indicated that data center revenue has benefited their locality. Local government staff indicated data center revenue has allowed their locality to

- lower real estate tax rates (Loudoun and Prince William),
- develop an affordable housing trust fund (Henrico County),
- establish revenue stabilization or reserve funds (Loudoun and Prince William), and
- construct new schools (Mecklenburg).

FIGURE 2-5
Some localities would collect far less revenue over a five-year period than others for the same data center development



SOURCE: JLARC staff analysis of locality property tax rates and depreciation schedules for computer equipment.
 NOTE: Tax rate is the business personal property tax rate in 2024 for computer equipment. Amounts exclude real property taxes. Amounts are based on a data center with \$150 million in equipment. Data center equipment is typically replaced every five years, which resets the depreciation schedule used to calculate the decline in value of equipment each year after its purchase.
^a Culpeper provides a local tax rebate for data centers that invest at least \$10 million and hire at least 10 new employees in the Culpeper Technology Zone, and therefore may reduce this amount for qualifying data centers. ^b Fredericksburg Region includes the City of Fredericksburg, Caroline County, King George County, Spotsylvania County, and Stafford County.

In addition to the revenue the industry generates, local government staff reported that data centers are an attractive industry because they impose minimal direct costs on the provision of government services compared with other industries. Data centers employ relatively few employees in comparison with other industries like manufacturing and logistics. Industries with more employees place greater demand on local roads, school systems, and other services.

Localities in distressed areas have difficulty attracting data centers

Data center developments could benefit localities in economically distressed areas of the state through increased local revenue. However, localities in these areas face several challenges in attracting data centers. To be considered, a locality likely needs to have 230kV transmission lines (the preferred voltage for modern data center campuses) and large and flat properties close to those transmission lines. These requirements could prevent many counties in distressed areas, particularly in Southwest Virginia, from being considered.

Localities in economically distressed areas that are away from population centers can also only compete for certain types of data centers. They cannot compete for data centers that need to be close to customers or require low latency, such as cloud computing and colocation facilities. However, they may be able to compete for data centers

running artificial intelligence (AI) workloads, such as training models, which do not need to be near populated areas and may not require low latency. AI is expected to drive a lot of future industry growth and presents an opportunity for more remote localities.

The state could improve the competitiveness of localities in distressed areas by helping them identify, prepare, and market industrial sites that are attractive to the data center industry. Data center companies prefer to move fast once a site has been identified, so available land should have access to roads and other utilities (water, sewer) that allow construction to begin soon after selection. Company representatives said industrial sites that are shovel-ready could be particularly attractive. The primary reason Mecklenburg was successful in attracting Microsoft was because the county had already identified a site suitable for data center development when Microsoft was looking for potential Virginia locations.

The Virginia Business Ready Sites Program, which is administered by VEDP, can be used for this purpose. The program identifies and assesses the readiness of potential industrial sites and provides site characterization and development grants to local governments and regional authorities. The program is intended to develop sites to attract large employers, such as manufacturers, but it can be used to identify and develop sites for which data centers would be a “best use” and would generate a positive return on investment for the state. For example, a 150-acre site that has limited road and rail infrastructure but is located close to 230kV transmission lines might be best used as a data center instead of a manufacturing plant. To help localities in distressed areas compete for data centers, VEDP should clarify that potential data center sites can be included in VEDP’s site listings and are eligible for Virginia Business Ready Sites Program grants.

RECOMMENDATION 1

The Virginia Economic Development Partnership should clarify in site characterization and development guidelines that potential data center sites are eligible for grants under the Virginia Business Ready Sites Program.

The state made changes to its data center sales tax exemption, discussed in the next section, several years ago to try to attract data centers to distressed areas of the state (sidebar). However, very few data centers have qualified for the exemption under the changes, so the changes alone may not be sufficient to overcome other challenges to attract data centers to these areas.

The 2020 General Assembly **lowered the eligibility requirements** for the data center exemption in distressed areas of the state to 10 jobs and capital investment of \$75 million to encourage growth in these areas.

State's data center exemption encourages industry growth and has moderate economic benefits

Virginia, like other states, uses incentives and other strategies to try to attract specific industries that can create new economic activity. The goal of targeting specific industries is to establish industry clusters or ecosystems.

Since 2010, Virginia has offered a retail sales and use tax exemption to attract large-scale data centers. The exemption allows qualifying data centers and their tenants to purchase computers and other equipment without paying the state sales tax on the following items, namely

- computer equipment such as servers, mainframes, network infrastructure, and data storage hardware; and
- other equipment such as cabling, switches, cooling equipment, generators, monitoring systems, and similar items used to operate exempt equipment.

This report includes higher estimates of the tax revenue impact of the data center exemption than was reported in prior years. Data centers using the exemption are now required to report to the Virginia Economic Development Partnership their annual eligible exemption expenditures and tax benefits.

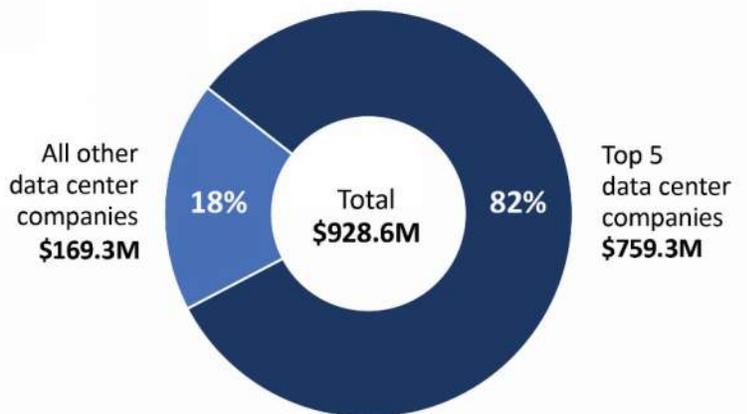
The statewide retail sales and use tax includes a 4.3 percent state share, a 1 percent local option share, and additional 0.7 percent to 1.7 percent regional share, depending on the region. In addition to collecting revenue from the local option, localities tax data center property in other ways, as described in this chapter.

Exemption provides qualifying data center companies with substantial tax reductions

Data center owners and their tenants, which can include a wide range of businesses in sectors like technology, health care, financial institutions, and retail, can claim the data center sales and use tax exemption if they meet eligibility requirements. To qualify, data centers must create a minimum of 50 jobs paying at least 150 percent of the prevailing annual average wage in the locality where the data center is located and make a \$150 million capital investment. As noted above, the minimum thresholds are lower for distressed areas. Data centers and tenants reported saving \$928.6 million in sales taxes in FY23 because of the exemption, including state, local, and regional portions of the tax (sidebar). The state portion of the exempted amount was an estimated \$683 million, making it by far the state's largest economic development incentive, with the next closest incentive valued at \$74 million.

Although approximately 30 data center companies (and their tenants, for colocation data centers) claim the exemption, most of the tax savings accrue to a small number of companies (Figure 2-6). Even so, the median savings for a data center company using the exemption was \$5.4 million in FY23, and all but six companies saved \$1 million or more.

FIGURE 2-6
Most of the tax savings from data center exemption go to only a few data center companies (FY23)



SOURCE: JLARC staff analysis of data center exemption information reported to VEDP.
 NOTE: For colocation data centers, the tax savings is attributed to the data center owner rather than the individual tenant, because the data center owner is the “holder” of the MOU and the reporting entity.

Exemption likely affects data center location and expansion decisions

Data center companies consider several factors when determining where to locate, and state sales tax exemptions are regularly ranked among their top factors. The other top site selection factors are access to power, available land, workforce quality, customer needs, business-friendly regulatory climate, and utility and other costs. While it is impossible to precisely determine the exemption’s importance in data centers’ location decisions, representatives from data center companies indicated the exemption was a key consideration because it greatly reduces their costs.

Data center companies view the exemption as important because their industry is capital intensive, and the exemption provides substantial savings on those investments. If a typical modern 250,000-square-foot data center costs \$250 million to \$325 million to build and equip, the exemption would provide an initial benefit of about \$9 million to \$15.5 million in savings (depending on the locality). Companies also save on subsequent equipment purchases, usually made every five years when data centers replace and upgrade their computer equipment. For colocation data centers, the exemption is also important for meeting customer needs, because it provides savings to tenants who purchase their own equipment.

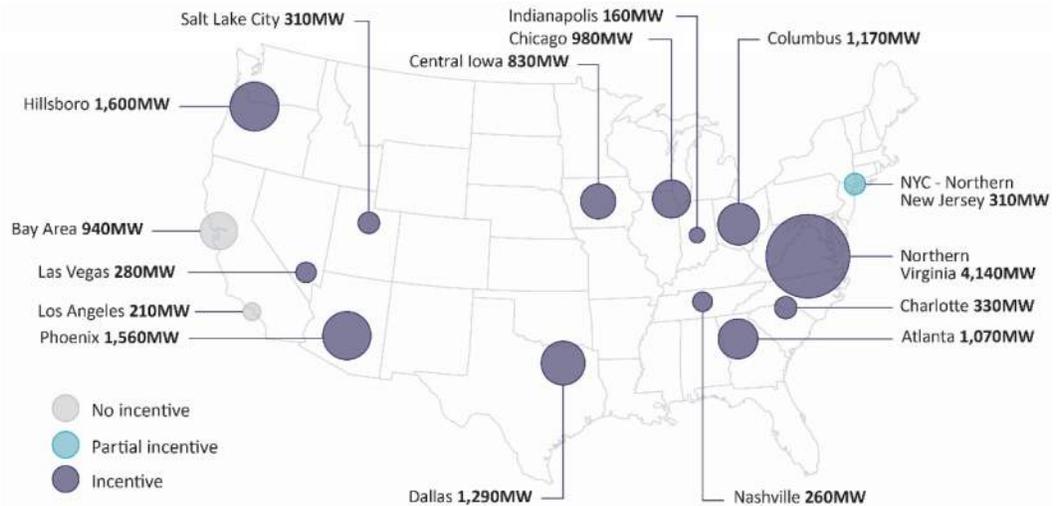
Virginia is competing for data centers with other states that have similar exemptions

Since the late 2000s, states have increased their efforts to attract data centers, primarily by adopting sales tax exemptions. In 2008, Virginia became the seventh state to adopt a sales tax exemption. (The initial exemption applied to very few localities and is no longer in effect, but a statewide exemption was adopted in 2010.) Today, the majority

of states either have a sales tax exemption for data centers (34) or do not have a sales tax (4). All states bordering Virginia provide a sales tax exemption to data centers. (See Appendix E for a map of states with a data center sales tax exemption.)

Virginia competes with other states for new data center developments, especially states that also have primary markets. Most other primary markets are located in states with exemptions, with the exceptions being markets in California and the New Jersey portion of the New York-northern New Jersey market (Figure 2-7). These two markets have a relatively small data center presence considering their proximity to major population centers, the California market's proximity to high tech firms in Silicon Valley, and the New Jersey market's proximity to the U.S. financial center in New York City.

FIGURE 2-7
All primary data center markets in the U.S. have exemptions, except for California and northern New Jersey markets, which are relatively small



SOURCE: JLARC staff analysis of Cushman & Wakefield 2024 Global Data Center Market Comparison.

NOTE: Oregon (Hillsboro market) does not have a sales tax (which has similar effect of the exemption). "Northern Virginia" refers to an estimate of data center capacity in the traditional Northern Virginia market consisting of Fairfax, Loudoun, and Prince William counties and Manassas. The Cushman & Wakefield report also includes an estimated 560 megawatts of capacity in Culpeper and Fauquier counties and the Richmond metropolitan region.

Data center exemption has moderate economic benefits and return in revenue to the state compared with other incentives

The data center exemption has moderate economic benefits and moderate return in revenue to the state compared with Virginia's other economic development incentives. (See *Data Center and Manufacturing Incentives*, JLARC, 2019.) It is rated as moderate because it is similar to the economic benefits and return in revenue for the average incentive (Table 2-2). Like most economic development incentives, the data center exemption does not pay for itself when considering just the state portion of the exemption cost and the state return in revenue.

TABLE 2-2
Data center exemption has moderate benefits compared with other incentives

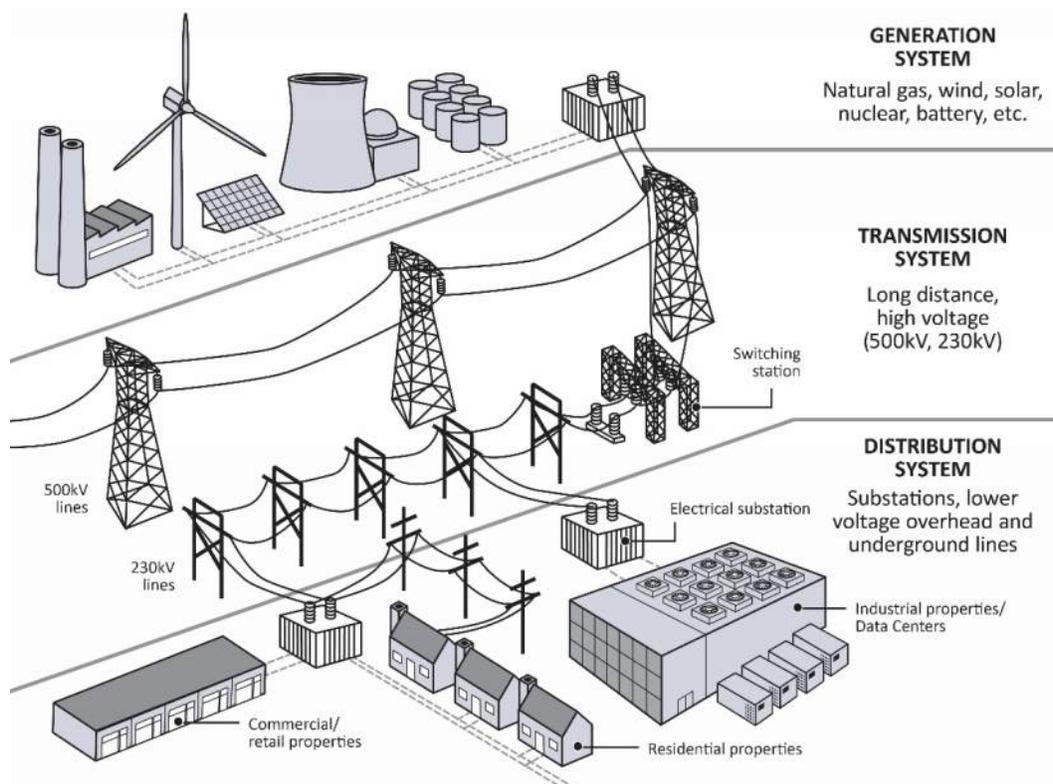
	Annual average	
	Data center exemption	Average Virginia incentive
Economic impact per \$1 million spent on the exemption		
Jobs added	84 jobs	58 jobs
Income added	\$6 M	\$5 M
Virginia GDP increase	\$10 M	\$9 M
Impact on state revenue per \$1 spent on the exemption		
Return in revenue per \$1 spent	48¢	41¢

SOURCE: *Economic Development Incentives 2024*, JLARC 2024.

3 Energy Impacts

Virginia’s power grid is part of the North American Eastern Interconnection, a massive energy infrastructure network that provides electricity to most states and several Canadian provinces east of the Rocky Mountains. The grid comprises three key interconnected systems: generation, transmission, and distribution (Figure 3-1). Power generation in Virginia has historically come from a few large carbon fuel and nuclear plants, but is increasingly coming from renewable sources like solar and wind. The transmission system moves power in bulk over long distances from where it is generated to the area where it is consumed. Power is then reduced to lower voltages and provided to homes, businesses, and other consumers through the distribution system.

FIGURE 3-1
Power grid is a complex network of generation, transmission, and distribution systems

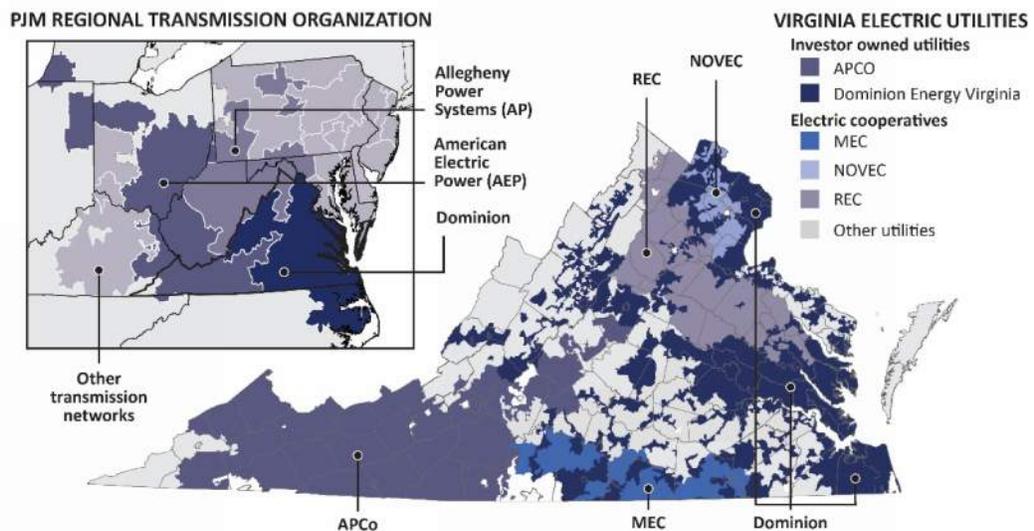


SOURCE: JLARC staff.

Within the eastern power grid, Virginia is part of the PJM regional transmission organization (Figure 3-2). PJM is a not-for-profit organization that coordinates generation and transmission operations and operates as a wholesale power market for its members, including utilities, independent power generators, and other energy companies. Within Virginia’s section of PJM, the two main power utilities are Dominion and American Electric Power (AEP), which operate much of the generation and most of the transmission that serve the state. Dominion and AEP (under its subsidiary Appalachian Power Company, or APCO) are also the distribution utilities for much of the state. However, a significant portion of the state is served by 13 distribution cooperatives (the “co-ops”). Most co-ops purchase their power through another generation and transmission utility, the Old Dominion Electric Cooperative (ODEC), which operates or partially owns a few power plants, and contracts for additional power, in and outside of Virginia. The largest distribution co-op, the Northern Virginia Electric Cooperative (NOVEC), purchases its own generation and operates one power plant.

Virginia’s power utilities are subject to state and federal laws and are regulated by the State Corporation Commission (SCC) and the Federal Energy Regulatory Commission (FERC). One of SCC’s key functions is to approve new generation and transmission projects. See Appendix F for more discussion of generation and transmission projects’ potential impacts and how regulators and utilities try to minimize those impacts.

FIGURE 3-2
Virginia is part of PJM and relies on transmission and distribution utilities



SOURCE: PJM and SCC maps.

NOTE: MEC = Mecklenburg Electric Cooperative. REC = Rappahannock Electric Cooperative. Additional cooperatives that are not named above include A&N, BARC, Craig-Botetourt, Community, Central Virginia, Northern Neck, Powell Valley, Prince George, Southside, and Shenandoah Valley. There are also several small municipal power utilities, and the investor-owned Eastern Kentucky Power Company serves a small portion of Southwest Virginia.

Data center industry is driving immense increase in energy demand and will require enormous new infrastructure investments

Modern data centers consume substantially more energy than other types of commercial or industrial operations. For example, one of the smaller data centers recently constructed in Virginia can draw up to 18 MW of power (sidebar). This is roughly equivalent to a mid-sized automobile assembly plant, 60 large commercial office buildings, or 4,500 homes. The largest new data centers can draw from 100 to over 200 MW each, which is more than most industrial consumers. Some planned data center campuses are expected to consume well over 1,000 MW, once fully built out, which is more than the 950 MW generation capacity of the state's largest nuclear reactor.

To evaluate the potential energy impacts of the data center industry, JLARC staff commissioned an independent forecast of *unconstrained* power demand growth in Virginia, based on historical data trends. The unconstrained forecast shows what demand would be before accounting for constraints like the ability to build enough energy infrastructure to meet demand. JLARC staff also commissioned an independent grid model to project what future generation and transmission infrastructure would be needed to meet (1) unconstrained demand and (2) half of unconstrained demand. The grid model also estimated infrastructure needs if there was no new data center demand, so that the effects of data center growth could be separated from other effects on the grid. The demand forecast was developed by staff from the Weldon Cooper Center for Public Service at the University of Virginia, and the grid model was developed by energy consultant Energy + Environmental Economics (E3). See Appendix B for additional details.

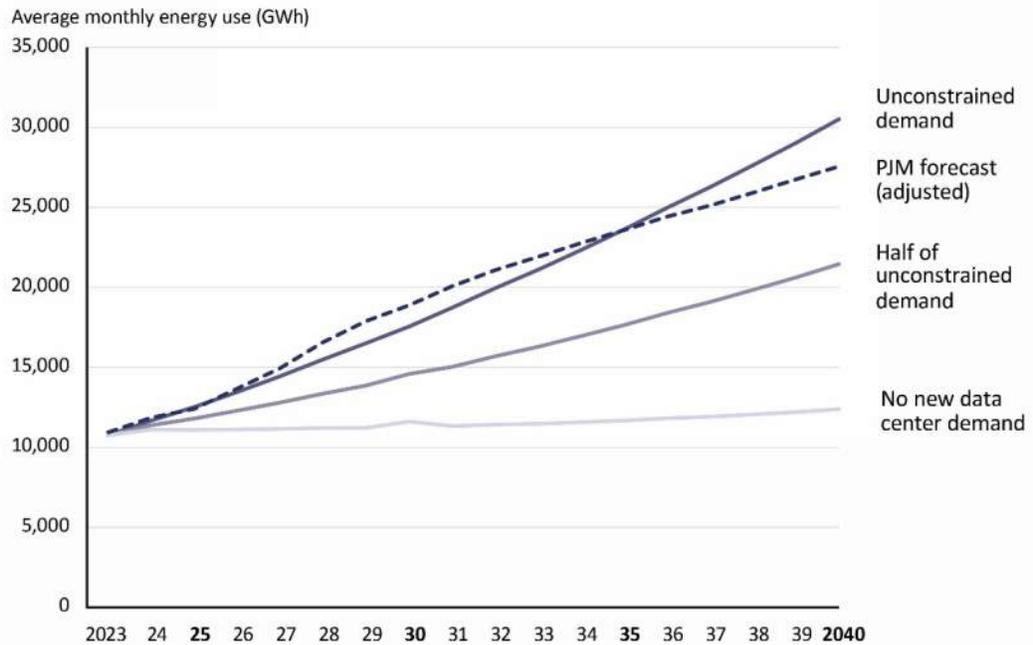
Data center power demand is typically measured in megawatts (MW). A watt measures the amount of energy produced or consumed at any instant, and a megawatt is equal to 1 million watts. For example, a 100 MW data center can consume up to 100 MW of energy at a given point in time. Energy consumption over time is typically measured in kilowatt-hours (KWh) or megawatt-hours (MWh).

Data center industry is forecast to drive immense increase in energy demand

The data center industry boom in Virginia has substantially driven up energy demand, and demand is forecast to continue growing for the foreseeable future. The state's energy demand was essentially flat from 2006 to 2020 because, even though the population increased, improvements in energy efficiency offset that increase. However, by 2024, PJM forecast an unprecedented 5.5 percent year-over-year growth in the Dominion transmission zone, mainly because of increasing data center demand.

JLARC's independent forecast shows that unconstrained demand for power in Virginia is expected to double within the next 10 years, driven primarily by the data center industry's growth (Figure 3-3). Almost all of the demand growth is expected to occur in the Dominion transmission zone, which covers the Northern and Central Virginia regions, where most new data centers are being built. JLARC's forecast largely matched the most recent PJM forecast.

FIGURE 3-3
Data center demand would drive immense increase in energy demand in Virginia, based on JLARC's independent forecast and other forecasts



SOURCE: JLARC staff consultant analysis.

NOTE: Forecast is for Virginia. PJM forecast is the 2024 forecast for the Dominion transmission zone adjusted upward to account for APCO; this adjustment had no effect on the trendline shown and was done so that the forecasts could be more easily compared. JLARC's independent forecast was developed using actual, historical energy use and employed advanced statistical methods to project use going forward. While JLARC's forecast was checked against the data reported by utilities on future data center load requests, that data was not used to formulate the forecast.

The first five years of JLARC's unconstrained demand forecast are in line with the new data center load additions that are expected, based on existing utility service and data center construction agreements, data center projects that have been announced, and national energy research conducted by Lawrence Berkeley National Laboratory and the Electric Power Research Institute.

New generation and transmission infrastructure will need to be built to help address data center demand

JLARC's grid model found that a substantial amount of new generation and transmission infrastructure would need to be built in Virginia to meet unconstrained demand, or even half of unconstrained demand, and most of the new infrastructure needs would be attributable to the growing data center industry (Table 3-1). For each of the demand scenarios, the model considered the most feasible and economical approaches to meeting infrastructure needs with and without the requirements of the Virginia Clean Economy Act (VCEA). The modeling was done using industry standard approaches and tools for electric utility and state energy planning purposes. It is based

on current state and federal laws and regulations. Some costs, such as the social cost of carbon, were not explicitly included in the model.

VCEA was enacted in 2020 to drive investment in renewable resources and requires the phaseout of carbon-emitting generation in the state by 2050. (See Appendix G.) VCEA requires that an increasingly larger share of the energy sold by the investor-owned utilities, Dominion and APCO, to their retail customers come from renewable and in-state generation sources. While this results in slightly more generation being built in-state than would otherwise occur, it has little effect on new transmission infrastructure needs and could increase the amount of energy that is imported from out of state. VCEA's effects on renewable and in-state generation are not as pronounced as might be expected because the requirements for utilities to sell energy from these sources do not apply to the co-ops, and a majority of projected data center growth (~60 percent) is expected to occur in co-op service territories. See Appendix H for additional details on generation capacity and energy sources expected under each scenario.

TABLE 3-1
Addressing demand from data centers would require substantial investment in new in-state generation resources and transmission by 2040

			Change from 2025 to 2040			
			Scenario 1: Unconstrained demand		Scenario 2: Half unconstrained demand	
			No VCEA	VCEA	No VCEA	VCEA
Current system						
Generation resources (in-state)	36,000 MW capacity	Net increase	+54,100 MW	+56,300 MW	+31,200 MW	+34,700 MW
		<i>Data center share</i>	+35,600	+34,300	+12,800	+12,700
Transmission (interzonal)	8,700 MW capacity	Net increase	+3,500 MW	+3,500 MW	+3,100 MW	+3,100 MW
		<i>Data center share</i>	+3,500	+3,500	+3,100	+3,100
Imported energy (net)	38 TWh annual energy ^a	Net increase	+62 TWh	+73 TWh	+24 TWh	+24 TWh
		<i>Data center share</i>	+79 ^b	+92 ^b	+41 ^b	+43 ^b

SOURCE: E3 grid modeling analysis. Current system capacity and energy are derived from Energy Exemplar PLEXOS database.

NOTE: Generation is in-state nameplate capacity that would need to be built, which can be significantly higher than the amount of energy produced by a resource over a year (e.g., Virginia solar facilities produce at around 25 percent of nameplate capacity). The model predicts new generation capacity would still be built even without data center growth, because the grid is expected to shift to cheaper renewable energy sources and construction of more in-state generation to reduce reliance on imports. Transmission shows only current and additional interzonal capacity needed for power exchange between the Dominion transmission zone and neighboring zones. It does not show transmission capacity or additions *within* the Dominion transmission zone.

^a TWh=terawatt hours. TWh are used to measure large amounts of energy consumed over time. One TWh = 1,000,000 MWh.

^b Data center share of imported energy is larger than the net increase because, without data center demand, imported energy would decline. For example, under Scenario 1 (no VCEA), energy imports would decrease -17 TWh from 2025 to 2040 without data center demand. +79 TWh data center share -17 TWh = net increase of +62 TWh.

Building enough infrastructure to meet growing data center demand will be difficult under both forecast scenarios

Historically, utilities and other PJM members have kept up with demand by building enough new generation resources and transmission to meet demand. Utilities have been able to do this because demand has increased slowly or been relatively flat over the past several decades, but the expected increase in demand from data centers will far outpace previous energy demand growth. If utilities are unable to build enough new generation and transmission to keep pace with forecast data center demand, there are two likely outcomes: (1) they will delay the retirement of older fossil fuel plants, and less economical plants, to the extent allowed by state and federal law, and (2) they will delay the addition of new large load customers, mainly data centers, until there is adequate transmission and generation capacity to serve them. On the demand side, data centers will seek out markets where demand can be met and pursue ways of contracting for and generating their own power. While it is possible that enough infrastructure could be built to meet growing data center demand in Virginia, it would be difficult to accomplish.

VCEA financially penalizes utilities that do not comply with renewables requirements by levying deficiency payments, but in practice, utilities may choose to pay those deficiency payments if it is more economical or feasible than securing new renewable generation. Statute directs any deficiency payments collected to be used in support of job training, energy efficiency, and renewable energy programs. The costs of deficiency payments are recovered from utility customers.

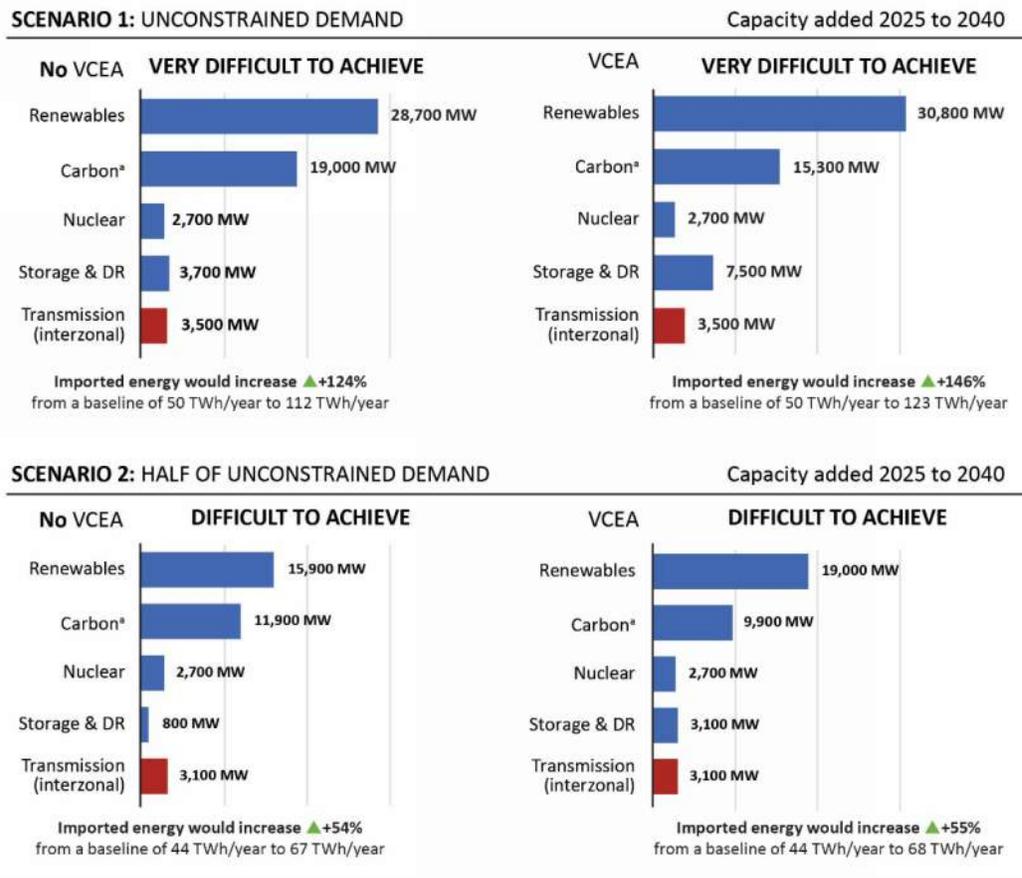
It could be especially challenging to meet demand while also fully meeting VCEA renewable requirements. Dominion's 2024 integrated resource plan indicates that it expects to meet VCEA renewable requirements for most, but not all, years between now and 2040 and expects to pay deficiency payments in some years (sidebar). In addition, in its previous 2023 plan, Dominion indicated it did not expect to meet VCEA requirements to retire carbon emitting assets that take effect in 2045. The previous plan stated: "Due to an increasing load forecast, and the need for dispatchable [i.e., easily scalable] generation, the [modeled planning scenarios] show additional natural gas-fired resources and preservation of existing carbon-emitting units beyond [the 2045] statutory retirement deadlines established in the VCEA." The revised 2024 plan does not comment on this and does not project out past 2040.

Building enough infrastructure to meet *unconstrained* energy demand will be very difficult, with or without meeting VCEA requirements (Scenario 1)

It will be very difficult to build new generation and transmission in Virginia fast enough to match unconstrained demand by 2040 (Scenario 1) and would require a massive and sustained build-out of new renewable, carbon, nuclear, and storage facilities (Figure 3-5). Build rates would have to greatly outpace what has been accomplished historically. Solar facilities would have to be added at about twice the annual rate they were added in 2024, and the amount of new wind generation needed (8,800 MW) would exceed the potential capabilities of all offshore wind sites that have so far been secured for future development (7,400 MW). New natural gas plants would have to be added at a rate of one large 1,500 MW plant almost every year (without meeting

VCEA requirements) or almost every 1.5 years (meeting VCEA requirements) for 15 consecutive years, which would be faster than the rate they were added during the busiest build period of the last decade in the state. Additional pipeline capacity may also need to be added to serve such a substantial increase in natural gas generation, which would create additional challenges. The unconstrained demand scenario would also require building more nuclear generation, presumably using new technologies.

FIGURE 3-4
Estimated generation mix needed to meet demand scenarios, with and without meeting VCEA requirements



SOURCE: E3 grid modeling analysis.

NOTE: The generation and transmission solutions generated by the model are tested to ensure they would produce a reliable system. Generation capacity is given in *nameplate* capacity, which can be significantly higher than the amount of power that can actually be expected after accounting for resource intermittency and downtime (firm capacity). The model predicts only interzonal transmission needed between PJM zones, but additional transmission would need to be built within the Dominion transmission zone. DR is demand response resources, which refer to customers who can reduce energy use during peak load events or add energy back on to the grid. The figure does not show what would need to be built if there were no new data center demand (Scenario 3). Under this scenario, the grid would be able to transition to a more renewable-based system with relatively less difficulty.

*Carbon includes natural gas, coal, and oil. Biomass facilities are counted as renewable resources, per the VCEA. However, starting in 2045, E3's grid model assumes natural gas plants would be converted to hydrogen fuel in each scenario when VCEA requirements are met.

To meet transmission needs, the state would have to increase interzonal capacity to the Dominion transmission zone by approximately 40 percent and construct additional transmission within the zone. Many of the new transmission lines would need to be built in densely populated regions of the state with limited options for siting new infrastructure. (Figure 3-4 shows only new interzonal transmission.)

In addition to building new in-state generation and transmission, the state would need to more than double the amount of energy imported from out of state. Consequently, Virginia would be reliant on additional generation being built at a rapid pace in other states in the PJM region and would need these other states to build sufficient generation capacity to serve Virginia's needs as well as their own.

Building enough infrastructure to meet only *half of unconstrained* energy demand will be difficult (Scenario 2)

It would likely still be difficult to build enough new generation and transmission to meet half of unconstrained demand by 2040 (Scenario 2). Meeting demand would also require a sustained build-out of new renewable, carbon, nuclear, and storage facilities. Solar facilities would have to be added at a rate of 650 to 700 MW per year, which is substantial but lower than the 1,000 MW expected to be added in 2024. New nuclear generation would also be needed.

If VCEA requirements are not considered, the biggest challenge would be building new natural gas plants. New gas would need to be added at the rate of about one large 1,500 MW plant every two years for 15 consecutive years, which would be about the same rate Dominion added these types of plants during its busiest period of the last decade (2012 to 2018).

If it is assumed VCEA requirements are met, the biggest challenges would be building enough wind, battery storage, and natural gas “peaker” plants (sidebar). Wind generation needs would exceed the potential capabilities of all secured offshore wind sites in Virginia. The amount of new battery storage needed would be several times the small amount of existing battery storage in Virginia but would be equivalent to what has already been installed in Texas and about half of California's installed capacity. A significant number of new natural gas “peaker” plants would also be needed to help balance intermittent generation from renewables.

Transmission needs would remain substantial under the half of unconstrained demand scenarios, especially in and around the Northern Virginia region, and building enough transmission capacity within a 15-year timeframe could be even more difficult than building enough generation. The amount of energy the state would need to import would increase by over 50 percent.

“Peaker” plants are 50 MW to 150 MW facilities used intermittently to supplement other types of generation when there is not sufficient energy to meet demand. Historically, they have mostly operated at times when cooling and heating needs are the highest among households. However, as more solar and wind generation is incorporated into the grid, they can be used to provide energy when these renewables are not producing (alongside battery storage).

New infrastructure projects face several challenges that make a rapid increase in construction difficult to achieve

Under the most favorable circumstances, it takes five or more years to develop and build new generation facilities, limiting how fast they can be added to the grid. New generation projects face several challenges that could keep them from being built, including community opposition (especially to solar and natural gas projects), long lead times to procure equipment, workforce constraints, and state and federal laws that limit what new carbon-emitting generation facilities can be built. PJM data shows that only a small percentage of projects that submit applications are ever actually built (sidebar).

A significant portion of new generation would need to come from solar projects, which could face challenges acquiring enough land. Generally, a solar facility in Virginia needs five to 10 acres to produce one MW of power. Assuming an average need of 7.5 acres per MW, and the scenarios modeled above, JLARC staff estimated that Virginia will have about 57,000 acres of land devoted to utility-scale solar by 2025, and new projects could require from 73,000 to 165,000 additional acres by 2040, depending on the demand scenario. Utilities and independent generators could face significant challenges in acquiring and gaining local approval for this much additional land, given the resistance solar projects have already encountered in some Virginia communities.

Small modular nuclear reactors have been identified as a potential future generation source. However, none have been successfully built in the United States, only a few exist worldwide, and this technology has not yet been proven to be a viable utility generation source. They also have high upfront costs that pose a barrier to their commercial viability, and some communities may oppose them being built nearby. Other promising, emerging technologies that have not yet proven to be commercially viable at a utility scale are hydrogen generation, long duration battery storage, and floating offshore wind.

Utilities also face challenges completing the many major transmission projects that will be needed to connect generation to data center markets, including the numerous new and dispersed renewable generation facilities that are expected to be built. For example, PJM's goal is to have \$3.5 billion in Virginia transmission projects that were proposed in December 2023 for Virginia, mostly to serve data center demand, to be in service by June 2027. This 3.5-year timeline is possibly unrealistic considering that major new transmission projects often take five to seven years to complete.

PJM must study and improve the addition of most new utility-scale generation to the grid. PJM's approval process became overwhelmed by small-scale renewable projects in 2022, which led to a two-year pause in approvals while PJM reformed its process. This pause may have affected the number of projects that have been built in recent years, but project success rates were already low before the pause (29 percent in 2018).

Demand growth raises concerns about system capacity and reliability, but existing utility requirements and processes limit risks

Federal Energy Regulatory Commission (FERC) oversees the nation's electrical grid.

North American Electrical Reliability Corporation (NERC) sets reliability standards for the grid.

Electrical utilities in Virginia have an obligation to serve any customer within their service territory, but they are not required to provide service immediately upon request. Their foremost responsibility is to ensure the reliability of the power grid before adding any new, large customers like data centers. Federal and international bodies oversee transmission organizations and utilities and set reliability standards that PJM and Virginia utilities must follow (sidebar). The state also sets its own requirements for utilities, which SCC is responsible for enforcing. These requirements and processes are intended to identify future reliability problems and ensure they are resolved before the grid is affected.

Generation capacity concerns are partially addressed through PJM requirements and utility planning processes, but risks remain

PJM protects grid reliability by requiring utilities to secure enough generation capacity to meet the next three years of projected customer demand, plus a reserve margin to account for peak load (i.e., high energy use) events like hot summer days. The regional PJM grid appears to have sufficient generation capacity to meet current demand without causing any system reliability concerns. However, PJM estimates the grid could run out of needed reserve capacity by 2030, even under optimistic assumptions for adding new generation (Figure 3-5). If utilities are not able to secure enough capacity to meet projected demand, they would have to delay adding new load or shed existing load to meet capacity requirements and maintain system reliability.

Although PJM sets minimum capacity requirements for utilities, there is some uncertainty in whether regional generation will be sufficient because it is not centrally planned. PJM does not plan for and identify specific generation projects that are needed (like it does for transmission), cannot direct new generation to be built, does not own or operate any generation sources (like a utility), and cannot stop a utility or independent operator from retiring an existing generation facility (although it can offer “reliability must run” payments to keep a facility open in the short term). Virginia cannot address these structural issues because PJM is federally regulated, not state regulated. PJM is aware of generation capacity concerns and is working to try and address them.

FIGURE 3-5
PJM projects available generating capacity could decline below reserve levels within a few years



SOURCE: JLARC staff analysis of PJM data and reports.

NOTE: PJM's reserve capacity projections were prepared in February 2023, using its 2023 demand forecast. PJM has since revised its demand forecast upward and in August projected a potential 1,663 MW shortfall in total capacity by 2029/2030.

At the state level, utilities protect grid reliability by planning to meet their own generation needs and PJM capacity requirements. Dominion and APCO—Virginia's two investor-owned utilities—are required to develop integrated resource plans that describe how they will meet capacity needs and submit them to SCC as part of a litigated proceeding. SCC holds public hearings to review the plans and gain perspectives from the utility, SCC staff, and other stakeholders, such as environmental groups and business interests. Despite disagreements over utility plans (sidebar), this process ensures the state's largest utilities plan to meet future generation needs and that these plans are scrutinized by regulators and stakeholders. Virginia co-ops also plan for their future generation needs, although the process is not as formal or subject to the same scrutiny. Most co-ops plan to purchase energy for data center customers from the PJM market rather than building generation to serve data center energy needs.

Individual utility planning does not guarantee that the generation resources needed for the whole PJM region will be built, which contributes to uncertainty about the sufficiency of future capacity. Both investor-owned utilities and co-ops plan to fulfill some future share of their energy demand with energy imported from elsewhere in the PJM market and, as discussed above, there is some uncertainty in whether regional generation will be sufficient to meet that demand. Growing demand from the data center industry in other states, such as the growing Chicago and Ohio markets, could limit how much energy is available to be imported by Virginia utilities.

Stakeholders sometimes contest whether the integrated resource plans developed by utilities provide the best generation solutions for meeting future demand, or whether proposals conform to state law. For example, SCC staff recommended that Dominion's most recent 2023 plan be denied over VCEA compliance concerns, and the plan was not approved by the Commission.

Transmission reliability concerns appear to be effectively addressed through existing PJM and utility planning processes

PJM evaluates the overall transmission system through its annual Regional Transmission Expansion Plan (RTEP). Under the RTEP process, both PJM and transmission owners assess the potential impacts of expected changes in demand and generation to see if and where standards violations or other reliability concerns could occur. They then solicit or propose system improvements, such as new transmission substations and lines, to address identified problems.

PJM and utility transmission owners centrally identify the impacts large loads are expected to have, and how those loads can be brought on safely without causing transmission reliability problems. At the project level, transmission owners like Dominion are required to study how the addition of a proposed data center (or any other large load) would affect the transmission system. These interconnection studies determine if the existing transmission system is sufficient to handle the load or if upgrades are needed to avoid violations of national reliability standards, such as excessive voltage incidents or outages. At the system level, both PJM and transmission owners must review the expected cumulative impact of demand growth on the transmission system, from proposed data centers and all other sources, and identify needed improvements (sidebar). Utilities cannot add new large loads to the grid, including from data centers, until identified transmission improvements are made. For example, if a new transmission line is needed for proposed data centers in Northern Virginia, utilities cannot add new data center loads until that line is operational.

Transmission planning processes appear to be working properly to protect reliability. In 2022, Dominion paused adding new data center loads in Loudoun County for three months as it worked to resolve regional transmission constraints. Since then, Dominion has incrementally added new data center loads in Loudoun to ensure new additions do not compromise the reliability of the transmission system. The utility expects the constraints that limit new load additions will not be fully resolved until 2025. Similarly, in July 2024, Dominion sent a letter to customers informing them that future large load additions to any part of the Dominion transmission zone are expected to take 12 to 36 months longer than they have previously taken so that the utility can appropriately plan for and connect the “record pace” of new load requests to the transmission system.

State could clarify that utilities can delay the addition of new, large loads if necessary to protect grid reliability

If utilities are unable to build enough new infrastructure to keep pace with energy demand, one of the main ways they can protect grid reliability is by delaying the addition of new large load customers until there is adequate generation and transmission capacity. Utilities appear to have the authority to delay large load additions for transmission-related concerns because this has already been done without legal objections. It is less clear if utilities are allowed to delay adding new load because of generation concerns. For example, representatives from one co-op utility indicated they did not believe they had the authority to provide less load than requested or delay new load additions for capacity, costs, or other reasons. The state could explicitly give utilities the authority to delay additions of new large loads if it is necessary to maintain grid reliability and avoid exceeding available generation or transmission capacity constraints.

RECOMMENDATION 2

The General Assembly may wish to consider amending the Code of Virginia to clarify that electric utilities have the authority to delay, but not deny, service to customers when the addition of customer load cannot be supported by the transmission system or available generation capacity.

Some stakeholders have asserted that the state should have a process for determining *whether* demand from large load data center customers should be met, not just *how* it should be met. In theory, the state could require evaluation of large load requests and allow requests to be denied through the existing SCC case process. However, this would be a shift in the historical U.S. electric utility paradigm and could be subject to legal challenges.

State could encourage or require data centers to take actions to help address their energy impacts, but actions would have marginal impact on demand

Virginia's growing data center industry is projected to greatly increase energy demand and will require construction of new generation and transmission infrastructure beyond what would have otherwise been built. Although regulators and utilities have requirements and processes in place to manage risks to grid reliability, new infrastructure projects can put VCEA renewable energy goals at risk, affect local communities and natural and historic resources (Appendix F), and affect customers' utility rates (Chapter 4). Data center companies could help address their energy impacts by

- promoting development of renewable energy generation,
- participating in demand response programs, and
- managing energy efficiency.

Many data center companies are already taking some of these steps, and the state could encourage or require further action. Data center companies are also exploring options for generating their own power, but it is unclear if this would address their impacts on the main power grid (Appendix I).

While these actions could have a marginal effect on data centers' energy impacts, they will not substantially reduce their energy demand or the challenges posed by growing demand.

Data centers could adopt more effective strategies for promoting renewable energy, but these would not lower their energy demand

Data center companies—including the four hyperscaler companies that account for a vast majority of the industry in Virginia—have carbon neutral policy goals that encourage investment in new, renewable generation. Some companies also directly invest

in renewable energy projects in the PJM region and the development of new technologies, like small modular nuclear reactors. The scale of industry efforts is not easily quantifiable, so it is uncertain how much these efforts could help offset the industry's growing demand in Virginia.

Virginia's data center industry could be encouraged to further support investment in renewable energy and a reliable, decarbonized grid within the PJM region. The state already partially encourages this through VCEA's Accelerated Renewable Buyers program. Under the program, large customers with loads over 25 MW, which includes most data centers, can get credit for their purchases of renewable wind and solar energy made in the PJM region. Those credits go to offset what a utility charges customers for the utility's renewable generation projects, providing a financial incentive to participate. The program could be expanded to include utility-scale battery energy storage systems. Battery storage is needed because it can store and provide energy during periods when intermittent solar and wind generation is not producing power. Although battery storage systems do not count as net new generation, providing a financial incentive to invest in these resources is beneficial because of their importance in balancing loads from renewables. Any credit for using battery storage should be a partial credit per MW, based on capacity provided rather than energy consumed, and account for electric load carrying capacity (ELCC). ELCC is essentially a measure of the system energy contributions a given type of resource provides, and PJM assigns and regularly revises ELCC ratings. Currently four-hour battery storage has an ELCC rating of 59 percent for 2025/2026, meaning that a partial credit of 59 percent could be allowed for each MW of capacity purchased from battery storage resources.

RECOMMENDATION 3

The General Assembly may wish to consider amending the Code of Virginia to expand the Accelerated Renewable Buyers program, which allows large customers of energy utilities to claim credit for purchases of solar and wind *energy* to offset certain utility charges, to also allow customers to claim partial credit for purchases of *capacity* from battery energy storage systems based on the current PJM electric load carrying capacity rating.

The program could be further expanded in the future to include other renewable or non-carbon energy sources, such as hydrogen generation and small modular reactors. This could help bring more generation resources online to serve growing data center demand but would not reduce energy demand.

Demand response programs could have a more meaningful impact on energy consumption

Under demand response programs, utility customers agree to reduce their power use or send power back to the grid during peak load events. This reduces the need for

additional generation and transmission to meet peak loads, and customers benefit by not getting billed higher peak load energy prices. Demand response programs are an effective way to reduce the need for new generation and transmission. As data centers become an increasingly large share of Virginia's base energy load, their participation in demand response programs could reduce the need for new infrastructure.

Data center companies in Virginia do not currently participate in demand response programs. Company representatives indicated that they have little flexibility to decrease energy use during peak load events because energy use is driven by computing activity, and computing activity is driven by customer and end user demand. From a business perspective, data center companies have strong incentives to keep facilities fully operational to meet their customer and end-user computing needs, and these typically outweigh financial incentives offered by voluntary utility demand response programs.

Despite limitations, there appear to be several viable ways that data center companies could participate in demand response programs. These include options for reducing demand during peak load events and adding energy to the grid during such events to offset a portion of their demand. Companies could

- shift some computing activity to other facilities outside of the region during peak load events,
- make operational adjustments that temporarily reduce energy use within the facility, such as small temperature adjustments for short periods, or
- install more environmentally friendly backup generators that are permitted to operate in non-emergency situations (sidebar), which could range from all generators at a facility to a subset of the generators used, or
- host battery storage systems that could serve as both a general utility and a demand response resource.

JLARC's consultant modeled the energy impact if data centers participated in demand response programs by using battery storage or backup generators to reduce or offset the equivalent of 10 percent of their load in a peak load emergency. The model found data centers could provide 2,000 to 2,400 MW of capacity value to the grid, which would slightly reduce the need for new in-state generation and transmission. A key consideration is that these demand response capabilities would have to be in place before new generation is added to have maximum effect.

Without state direction, most data center companies appear unlikely to participate in demand response programs. The state should not require a specific demand response method because different approaches may be more or less feasible for different companies. Instead, the state could direct utilities to implement a demand response program for large data center customers, such as any customer over 25 MW, and require these customers to participate in the program. This requirement could be phased in

Most data centers backup generation' comes from Tier 2 diesel generators, which cannot and should not be used as a demand response resource because of their emissions (nitrogen oxides, carbon monoxide, and particulate matter). Natural gas and Tier 4 diesel generators have lower emissions and can be used for demand response under state and federal law. Backup generation is discussed more in Chapter 5.

gradually to give companies time to work with utilities on demand response solutions and participation levels (e.g., MW or percentage of load a customer will commit) that are feasible for all parties. The requirement could be initially limited to investor-owned utilities and later expanded to include co-ops.

RECOMMENDATION 4

The General Assembly may wish to consider amending the Code of Virginia to require that utilities establish a demand response program for large data center customers and to require that these customers participate in the program.

Improving data center efficiency makes better use of energy but is likely to have only a marginal impact on demand

Data centers can improve energy efficiency in two primary ways. First, they can use newer and more efficient computer chips; computing activity ultimately drives almost all energy use in a data center. Second, they can improve the efficiency of their building systems, especially the cooling systems that account for most of the remaining energy use.

To promote energy efficiency, the state could encourage data center companies to meet an energy management standard, such as the International Organization for Standardization's (ISO) 50001. ISO 50001 requires organizations to set improvement goals, continually measure and evaluate outcomes, and revise policies to better achieve energy goals. An energy management standard can be fairly applied to all companies regardless of their business model. It is also preferable to requiring green building standards, such as Leadership in Energy and Environmental Design (LEED) building standards. Building standards could be required for new construction but may be unreasonable to retroactively apply to existing facilities.

The state could encourage data centers to adopt an energy management standard by making the state's sales and use tax exemption contingent on adoption. Many data center companies already set energy efficiency goals and policies, and a well-designed state incentive would complement these efforts and encourage other companies to adopt similar goals and policies.

POLICY OPTION 1

The General Assembly could consider amending the Code of Virginia to require that, as a condition of receiving the sales tax exemption, data center companies meet and certify to an energy management standard, such as the International Organization for Standardization's 50001 standard for energy management.

Recent legislation proposed requiring data centers to meet a specific Power Usage Effectiveness (PUE) ratio. The efficiency of cooling and other building systems in data centers is commonly measured using a PUE ratio. However, PUE does not indicate a

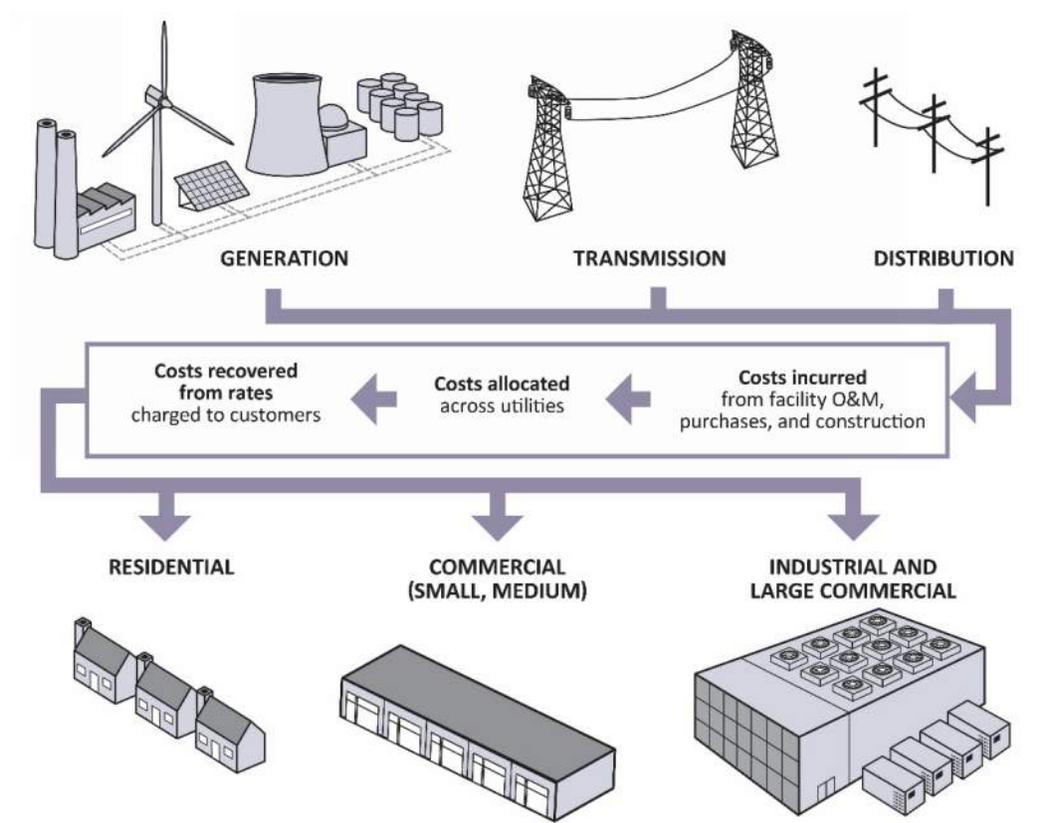
data center's overall energy efficiency; it measures only the efficiency of cooling and other building systems that support facility operations. The data center industry has a strong market incentive to be energy efficient because energy is one of their largest operating costs. Requiring a specific and narrow requirement, like meeting a specific PUE ratio, could have unintended consequences, and could not be as widely applied as the ISO 5001. (See Appendix J for additional information on PUE.)

Energy efficiency in general is an important goal for the data center industry, but efficiency improvements are unlikely to reduce the industry's overall energy demand. Currently, the data center industry is growing fast, demand for energy exceeds the available supply, and companies want to maximize the value of their multimillion-dollar assets. Consequently, any energy saved from efficiency gains is likely to be used to perform more computing activity. One company representative noted "at the end of the day, a 200 MW data center is going to be a 200 MW data center."

4 Energy Costs

Utilities incur costs to build, operate, and maintain the energy grid and provide power to customers. These costs are ultimately recouped through rates charged to customers (Figure 4-1). The main principle underlying utility rates is that the rates charged to different types of customers should recover costs that are approximately equal to the costs of serving those customers.

FIGURE 4-1
Utilities recover costs through rates charged to customers



SOURCE: JLARC staff analysis.

Utilities group their customers into classes of similar users, based on their cost of service. While the exact customer classes vary slightly among utilities, they generally fall into three groupings:

- residential customers,
- small to medium commercial customers, and

- industrial and other large commercial customers.

Within each customer class, customers are charged three categories of rates: generation, transmission, and distribution rates. Each rate is intended to recover costs related to that part of the system. For example, generation rates recover costs associated with operating power plants, constructing new plants, purchasing energy, and securing generation capacity from third parties. Transmission rates recover the cost of building and maintaining transmission lines. Distribution rates recover costs of building and maintaining substations, street-level powerlines, and other infrastructure needed to serve end-use customers. Utility rates sometimes include “riders” or “rate adjustment clauses” specifically intended to capture the cost of new infrastructure (e.g., a generation plant) or a specific initiative (e.g., grid modernization). Some costs can also be directly assigned to customers.

The State Corporation Commission (SCC) regularly reviews and approves utility rates to ensure they are reasonable. For example, SCC reviews Dominion’s rates every one to two years, depending on the rate type. SCC reviews consider if a utility is over- or under-collecting costs by customer class and whether any changes are needed to address any allocation issues. In making its determinations, SCC examines cost of service studies and other information presented by the utility and sometimes performs its own independent analysis. SCC’s responsibilities are established in state law.

Data centers are currently paying full cost of service

JLARC’s cost recovery study was performed by energy consultant E3. See Appendix B for additional details.

JLARC staff commissioned an independent study of utility cost recoveries under current rate structures to see if the data center industry is paying for its current costs (sidebar). The study focused on rates charged by Dominion, the Northern Virginia Electric Cooperative, and the Mecklenburg Electric Cooperative (the co-ops) because most existing data centers are located in their service territories. The study found that current rates appropriately allocate costs to the classes and customers responsible for incurring them, including data center customers. For example, the consultant’s independently derived cost allocations for Dominion closely match the ones that the utility uses to set its rates, with only a few small differences for residential and large customer rates (Table 4-1). This finding is corroborated by SCC reviews of utility cost recoveries, especially its biennial reviews of Dominion’s rates.

Utilities try to ensure data center customers pay the costs they incur in several ways. Dominion groups data centers into the same class with similar industrial and large commercial customers, charges rates based on energy and system use, and ensures recovery of costs associated with any new distribution infrastructure for data centers through contractually required minimum payments. Co-ops essentially treat data centers as their own customer class, charge rates based on energy and system use, and directly assign distribution costs for data centers to each specific customer. Co-ops take additional steps to separate the energy sources they use for data centers from the sources they use to serve the rest of co-op customers.

TABLE 4-1
Consultant’s independent cost allocations closely match allocations Dominion uses to set customer rates

Customer class	Generation-related costs		Transmission-related costs	
	Independent consultant allocation	Dominion allocation	Independent consultant allocation	Dominion allocation
Residential	40%	41%	53%	55%
GS-1 (small non-residential)	5%	5%	5%	5%
GS-2 (intermediate)	14%	14%	12%	12%
GS-3 (large, secondary voltage)	15%	15%	12%	11%
GS-4 (large, primary voltage, includes most data centers)	26%	26%	18%	16%
Total	100%	100%	100%	100%

SOURCE: E3 analysis and Dominion rate schedules. Numbers may not sum because of rounding.

NOTE: GS = General Service. Table does not show churches or outdoor lighting customer classes because <1%.

Growing energy demand from data centers is likely to increase other customers’ costs

Utility rates recover the cost of operating and maintaining the current system and any new infrastructure that must be built. Even though current rate structures appropriately allocate costs across customers, data centers’ increased demand will likely increase system costs for all customers, including non-data center customers. This is because current utility rate structures are not designed to account for sudden, large cost increases from the construction of new infrastructure to serve a relatively small number of very large customers.

JLARC’s consultant modeled the potential cost impacts of data center demand resulting from increased infrastructure needs. The model estimated costs under the two demand growth scenarios from Chapter 3: (1) unconstrained demand and (2) half of unconstrained demand, both with and without VCEA compliance. For this exercise, the model focused on cost and rate impacts in the Dominion transmission zone where most data centers are expected to be located (sidebar).

Generation and transmission costs are expected to increase from growing data center demand and will likely affect non-data center customers

Utility costs are likely to increase from the fixed costs of new infrastructure that will need to be built to address data center demand and the increase in prices as energy supply becomes constrained. Costs for the Dominion transmission zone could increase by an estimated \$16 billion to \$18 billion by 2040 under the unconstrained demand scenario, depending on if VCEA requirements are met. Costs could increase by \$8.5 billion to \$10 billion under the half of unconstrained demand scenario. In both

Dominion transmission zone includes the Northern, Central, and Tidewater regions of Virginia. These regions include Dominion’s *distribution* service territory and the *distribution* territories of most of the state’s electric cooperatives. See Chapter 3 for a map of the zone.

scenarios, most of the projected cost increases are attributable to growing data center demand. Costs do not reflect the full up-front capital costs of building new generation and transmission infrastructure, because these costs are amortized and collected from customers over a period of 20 to 40 years. Instead, they reflect the share of capital costs that would need to be recovered from customers each year, plus operating costs and energy purchases.

Building enough generation and transmission infrastructure to meet data center energy demand would be difficult because it requires constructing enormous amounts of new infrastructure. In addition, unconstrained demand scenarios would require building infrastructure faster than has been historically possible. See Chapter 3 for additional details.

Because generation and transmission costs are passed on to customers based on their actual usage, a substantial share of these costs would be recovered from the growing data center industry. However, a share of cost increases would be borne by other customers in three ways. First, a large amount of new generation and transmission would need to be built that would not otherwise be built, creating fixed costs that utilities would recover over the next several decades. A portion of these costs would be paid by non-data center customers. Second, because it would be difficult to provide enough energy supply to keep pace with growing data center demand, energy prices would increase for all customers (sidebar). Third, if utilities are more reliant on importing power to meet demand, they may not always be able to secure lower-cost power and would be more susceptible to spikes in energy market prices. These higher overall costs are likely to affect all customers, proportional to their energy use.

Distribution cost increases are likely to be assigned mostly to data centers and not other customers

Data center loads are typically so large that they are not served from the regular distribution system and are instead connected directly to transmission lines from a substation that serves one or a few data center customers. Consequently, the main distribution costs that data centers incur are for building and maintaining these substations.

Utility rate structures appear to effectively insulate other customers from paying for distribution costs associated with data centers. Dominion recovers data center distribution costs by charging them its standard industrial and large commercial customer class rates, but it also contractually requires data centers to make minimum payments that fully recover the cost of the distribution substations built to serve them. In addition, Dominion charges data center customers directly for any “surplus” equipment (e.g., redundant connections requested by the customer). Co-ops require data centers to directly pay all costs associated with new substations as they are constructed.

There is one way that growing demand from data centers could indirectly increase distribution costs for other customers. As data center demand grows, some transmission lines could be upgraded to higher voltages to meet demand. For example, an existing 115kV transmission line could be upgraded to a 230kV line. This can require distribution-side upgrades to *all* existing substations connecting to the high voltage line, including those that serve and are paid for by non-data center customers. The cost impacts of potential substation upgrades are uncertain because they cannot easily be modeled across the system.

Residential customers could experience cost increases that current utility and regulatory rate reviews cannot fully address

Utilities recover costs, including any future cost increases, through rates charged to customers. Rates are regularly reviewed by utilities, SCC, and the Federal Energy Regulatory Commission (FERC) to ensure costs are being properly assigned to customers (sidebar). Rate reviews ensure that system costs are being allocated in a way that best reflects which customers are responsible for incurring costs. For example, in 2019, Dominion received FERC approval to revise how transmission costs are allocated to utilities within its transmission zone, which effectively assigned a greater share of costs to large customers and reduced residential transmission costs by about 10 percent. While current rate structures will assign a larger portion of costs to data centers over time, rates are not designed to isolate other customers from cost increases driven by the expected system-transforming increase in data center demand.

Utilities regularly review their rates as required by state and federal laws.

SCC reviews and approves changes to generation, transmission, and distribution rates charged by utilities serving Virginia customers, such as Dominion and the co-ops.

FERC reviews and approves changes to how transmission costs are allocated to PJM and how transmission operators allocate cost to utilities.

Residential rates are likely to increase because of costs associated with growing data center demand

JLARC's consultant modeled how residential rates for Dominion customers might be affected by growing demand, assuming utilities and regulators use current practices to regularly reallocate costs. Dominion was chosen because of its large size and concentration of data centers. Residential rate changes were a key focus because they show how Virginia households could be affected and are indicative of how other customers, such as businesses, might be impacted.

Using the consultant's analysis, JLARC staff estimated that a typical residential customer with monthly consumption of 1,000 kWh could experience generation- and transmission-related costs increasing by an estimated \$33 per month by 2040 under the unconstrained demand scenario. Factoring in VCEA requirements would increase monthly costs by four dollars. However, building enough infrastructure to meet unconstrained demand would be very difficult. Under the half of unconstrained demand scenario, which is still difficult to achieve, the total cost is estimated to increase by around \$14 per month (Table 4-2), whether or not VCEA compliance is assumed.

The rate changes shown here represent the share of generation and transmission rate increases that could be attributed to growing data center demand. Dominion's total residential bill projections, from its integrated resource plan, show much larger overall increases than the numbers reported here. Dominion's projections apply to the whole residential customer bill and include several costs that are not captured in JLARC's analysis, such as distribution costs and the cost of some additional transmission and generation projects that may not be solely attributable to data centers. Dominion's residential bill projections are also in nominal dollars that have been adjusted upward using an inflation assumption, whereas JLARC's are held in constant

(or real) 2024 dollars to show the real growth of costs that consumers will experience, independent of inflation. Dominion used a demand forecast that is similar to JLARC's unconstrained demand forecast and substantially higher than the half of unconstrained demand forecast.

TABLE 4-2
Generation- and transmission-related costs for residential customers would increase by 2040 because of data center demand (Dominion example)

	Projected increase in generation & transmission charges (not including distribution charges & some transmission costs; 2024 constant dollars)	
	2030	2040
Typical monthly residential generation and transmission charges (2023)	\$90	\$90
Scenario 1: Unconstrained demand		
- VCEA (very difficult to achieve)	+\$23	+\$37
- No VCEA (very difficult to achieve)	+\$22	+\$33
Scenario 2: Half unconstrained demand		
VCEA (difficult to achieve)	+\$7	+\$14
No VCEA (difficult to achieve)	+\$6	+\$14

SOURCE: JLARC staff analysis of E3 model results and Dominion 2024 integrated resource plan.

NOTE: Typical monthly residential charges are the sum of the amount billed to Dominion residential customers assuming typical use of 1,000 kWh. Does not include potential increases in distribution and several other charges that customers typically pay for. Does not capture the cost of the many intrazonal transmission projects that would be needed or generation projects that are not attributable to data center demand.

Utilities could help insulate customers from systemwide cost increases with new data center customer class and rate-setting approaches

Historically, adding new customers to the energy grid, even large load customers like manufacturers, has not increased costs for other customers because additions have been gradual, and the existing system has had enough capacity to serve them. However, addressing the needs of the fast-growing data center industry, even if only half of unconstrained demand is met, would require increasing generation capacity by 80-to-90 percent and transmission capacity 36 percent by 2040. Current utility rate structures are not designed to account for sudden, large cost increases from new infrastructure construction to serve a relatively small number of very large customers. New approaches would be needed to isolate residential and other customers from cost increases.

Establishing a separate data center customer class is a first step utilities could take to help insulate residential and other customers from the energy cost impacts of the industry. Utilities already have the authority to create separate rate classes with SCC approval. Creating a separate data center customer class would allow costs to be more closely allocated to data centers and provide utilities with more flexibility over how to charge rates. Co-ops essentially treat data centers as their own customer class already,

so this change would only affect Dominion, which groups data centers with other industrial and large commercial customers. The General Assembly could require Dominion to establish a separate data center customer class, although historically the legislature has not set such detailed requirements in statute.

Establishing a separate data center customer class alone would not fully insulate other customers from cost impacts. Utilities, with SCC approval, would also need to establish new cost allocation methodologies that assign a greater share of generation and transmission fixed costs to the new data center customer class. For example, they could design rate structures that *directly* assign some fixed generation or transmission costs to a new data center customer class, or an increased share of those costs to the new class.

Rates may also need to be adjusted more frequently to insulate other customers from data center-driven costs. Currently, rate adjustments occur only every one to two years and can over or underestimate actual cost growth. For example, under Dominion's current biennial rate review, generation costs are reallocated and rates are adjusted every two years, based on forecast energy demand. While forecasts expect data center demand to increase, accurately forecasting the industry's rapid growth is challenging because of the many factors that can affect demand in a given year. Consequently, new rates may not fully account for shifts in how costs are being incurred across customer classes in the years in between biennial reviews. For example, if the company allocates 55 percent of costs to residential customers, but rapidly growing data center demand results in residential customers only being responsible for 52 percent of costs during the biennium, the costs recovered from residential customers could be higher than the costs they incur. This could also potentially work in the other direction, with residential customers being undercharged if costs are under-allocated based on forecasts.

Utility cost allocation and rate design are complex and highly technical, and the practicality and legality of any changes require detailed analysis to be fully understood. For this reason, utilities and SCC are in the best position to address future cost concerns through cost allocation and rate design changes. SCC is proactively looking into cost concerns from the data center industry and has scheduled a technical conference for December 2024 to explore the effects of the increasing number of data centers and other large-load customers on Virginia's utilities, ratepayers, and power grid. The conference will provide participants an opportunity to identify ways to address the cost concerns noted here and throughout this chapter.

Even if new customer classes and rate-setting methodologies are established, it may not be possible to isolate any customers from the cost impacts of higher energy prices (discussed above). In addition, energy prices in Virginia could still be affected by data center demand even if data center growth is slowed in the state, because industry growth could shift to other states in the PJM region, increasing energy prices throughout the region.

Data center growth creates additional financial risks to utilities and their customers

The growth of the data center industry presents several additional, but so far unrealized, financial risks to utilities and their customers. These risks largely result from the sheer size of the data center industry's energy demand relative to all other customers. These risks exist with the current size of the data center industry and will increase as the industry grows. Utilities have several mechanisms they use to manage financial risks from large data center customers, from planning processes to contracts, but these may not always be sufficient to mitigate the risks posed by the industry.

Data center demand could drive generation and transmission infrastructure to be overbuilt, stranding costs with existing customers

One of the main risks posed by the data center industry's rapid growth is that utilities will build more energy infrastructure than is needed if forecast demand does not materialize as expected, or one or more large data centers close. Overbuilding could strand utilities with infrastructure costs that would have to be recouped from their broader customer base. This would drive up costs for all customers, including residential and other non-data center customers. The overbuilding risk is mostly associated with generation and transmission, not distribution (sidebar). It is also more of a concern for Dominion than the co-ops, because Dominion builds generation to meet all customer needs and is responsible for transmission, whereas co-ops *purchase* most energy for their data center customers and are not directly responsible for transmission.

Distribution could be overbuilt but is less of a risk because most of these costs are fully recovered from data centers directly or through contractual minimum payment requirements.

Generation could be overbuilt if a substantial portion of the expected data center demand does not materialize, or if there is a decrease in that demand overtime. As a result, non-data center customers would pay a larger share of the fixed costs for this new generation. While it does not currently appear likely that supply will exceed demand, there is some risk because much of the data center industry is concentrated in a small number of companies. Therefore, business decisions at one company could have a substantial effect on overall demand. For example, if one of the major hyperscaler companies decided not to pursue development of new artificial intelligence (AI) products or has a line of AI products that fails to be commercially viable, then energy demand from that company could decrease substantially.

On the transmission side, there are three types of transmission lines to consider: (1) "backbone" lines that bring power into a region, (2) regional lines that move power to distribution points within the region, and (3) short extension lines that move power from main lines to serve a single distribution point, including extension lines that might be built to serve one or a few data center customers. Because transmission lines serve specific regions and distribution points, they are more at risk of being overbuilt if regional or individual customer demand does not materialize or decreases over time.

Utilities attempt to avoid overbuilding transmission and otherwise ensure costs are recovered. Dominion indicated it tries to avoid overbuilding by making transmission upgrades only as needed to meet the metered load expected from customers. For example, even if data center customers in an area have requested 2,000 MW of capacity, Dominion will only build new transmission to serve 1,000 MW if that is the forecasted metered load. One co-op utility indicated that it contractually requires data center customers to reimburse the utility for any penalties from transmission providers that may be incurred if a data center project is canceled. However, while utility actions reduce the risk of transmission costs being stranded with other customers, they do not eliminate this risk. For example, transmission costs can take up to several decades to recoup, and if a data center ceases operation before then, or it never uses the amount of energy it expected to, costs will be recovered from other customers.

Utilities could take additional steps to reduce the risk of generation and transmission costs being stranded with customers.

- Utilities could obtain contractual agreements from data centers customers to provide minimum payments that ensure the costs of major generation and transmission buildouts are not stranded with other customers. For example, AEP Ohio has proposed requiring any data center with over 25 MW of capacity to pay for at least 85 percent of the energy they expect to need, even if they use less, for at least 12 years.
- Utilities could directly assign some or all costs of smaller projects, such as transmission line extensions, to the customers or customer class for whom the line is primarily being built to serve. For example, if a two-mile transmission extension is primarily being built to serve a data center development, some or all of the project's costs could be assigned to that customer.

The state should direct Dominion to develop a plan for addressing the risk of generation and transmission infrastructure costs being stranded with existing customers. (Dominion is currently the only transmission-owning utility in the state expected to experience rapid demand growth.) The plan could adopt one or more of the approaches described above, or other approaches the utility identifies as more practical and effective. The plan could be included as part of Dominion's biennial rate review filing with SCC, or as a separate filing.

RECOMMENDATION 5

The General Assembly may wish to consider amending the Code of Virginia to direct Dominion Energy to develop a plan for addressing the risk of generation and transmission infrastructure costs being stranded with existing customers and file that plan with the State Corporation Commission as part of its biennial rate review filing or as a separate filing.

Data centers pose particular cost and financial solvency risks to electric co-ops and their customers

Virginia’s electric co-ops are not-for-profit companies that are essentially owned by their member customers. Their main purpose is to provide members with reliable power at low costs. Co-ops are much smaller than the state’s investor-owned, for-profit utilities—Dominion and APCO—and do not have the same financial resources or reserves as these companies.

An increasing share of data center growth is expected to occur in co-op service territories, and co-ops are statutorily obligated to serve these customers. Based on the half of unconstrained demand forecast, the industry could account for 80 percent or more of annual energy sales in three Virginia co-ops by 2030. This growth creates unique challenges for the co-ops, which must find ways to insulate themselves and other customers from the cost and financial solvency risks associated with taking on a small number of extremely large data center customers.

The main risk co-ops identified is that a data center could potentially delay, dispute, or fail to pay its energy generation bill. Co-ops purchase energy from PJM energy markets and then sell that energy to their data center customers. A weekly data center energy bill can be extremely large under normal circumstances and can be magnified by price spikes from peak load events. For example, one co-op estimated the weekly energy bill for 4,000 MW of power at data center sites expected to soon be built in its service territory could be \$20 million to \$40 million and could range upward of \$100 million under the energy price spikes that were seen in a major winter storm in 2022. PJM bills weekly, and if one or more data center customers dispute or otherwise do not pay on time, a co-op would have to cover its energy costs until they can be recouped. If the co-op was unable to recoup costs from one or more of its data center customers, the costs would ultimately have to be paid by all other co-op members, and a large enough bill could result in the co-op defaulting and going bankrupt.

Some co-ops said they were sufficiently addressing risks through their contracts with data centers, as allowed under current state law. Namely, these co-ops said the contracts allowed them to:

- perform credit checks when establishing service,
- require more frequent weekly payments for energy use, which aligns with PJM’s weekly billing cycle, so they do not have to float co-op funds to pay data center bills,
- require upfront payment of deposits and pledges of collateral based on what the co-op expects it would need to cover unpaid data center bills until further action, such as terminating service, can be taken, and
- terminate service for failure to pay.

Other co-ops said they did not believe that the existing contractual and legal tools available were sufficient to fully cover all potential financial risks, especially considering

data centers could soon account for the vast majority of their energy costs. They noted that current termination of service notification and dispute time periods could allow unpaid bills to continue increasing for several weeks (sidebar). They also said it can be challenging to get data center companies to agree to some contractual terms, such as committing to large collateral obligations designed to cover a large peak load event. These contractual and legal issues could be addressed at the SCC technical conference in December.

One co-op indicated that, even with additional contractual protections, they were still at risk if a data center company failed to meet its contractual obligations, such as if the company itself were unable to provide agreed upon payments. To address this, the co-op attempted to get SCC approval to create for-profit subsidiary companies to serve data center customers. Under this arrangement, if a data center did not pay its bills, only the subsidiary company would be affected, and the business continuity of the co-op would be assured. SCC acknowledged the risks the co-op had identified, but did not grant the request because it did not believe it had the legal authority to allow a co-op to serve customers through a separate for-profit legal entity, among other factors. The General Assembly could amend the Code of Virginia to expressly allow co-ops to create for-profit subsidiaries to serve data centers and other large load customers. The customer size could be set at 90 MW to match the statutory threshold that already exists for the retail choice program (discussed in the next section).

POLICY OPTION 2

The General Assembly could consider amending the Code of Virginia to allow electric cooperatives to create for-profit subsidiary companies that could fulfill their legal obligation to provide energy services (retail sales) to customers with load capacity of over 90 MW.

Data center company participation in retail choice program could shift generation costs to other customers

In Virginia, most customers are obligated to purchase generation through their incumbent utility. For example, a customer in Dominion's service territory must purchase power from Dominion. The one major exception is that large load customers, including most data centers, are allowed to participate in retail choice, which allows them to purchase energy through a provider of their choice (sidebar). The goal of the program is to encourage competition and lower energy prices for industrial and other large commercial customers.

Customers qualify for retail choice if they (a) exceed 5 MW and account for less than 1 percent of the utility's peak load, or (b) exceed 90 MW. The restriction that a customer cannot account more than 1 percent of the utility's load was intended to prevent customers from leaving the utility for retail choice if it could have negative cost impacts on the utility's remaining customers. The 90 MW exception was reportedly added to allow one particular industrial customer to participate in the program. At that time,

State law allows utilities to **terminate service after 10 days** of advance notice. However, customers can dispute billing issues that might lead to service termination, and co-ops indicated that **dispute resolution can take as long as 30 to 60 days**.

The current retail choice program was established in 2007 when Virginia's energy sector became re-regulated. Under the program, a qualifying customer can enter into an agreement to receive power from a third-party competitive service provider, which can purchase energy from the PJM market or enter into power purchase agreements with independent generators in or outside of Virginia to provide power to the customer.

very few customers exceeded the 90 MW threshold. Today, many existing data centers, and virtually all planned future ones, exceed 90 MW and are eligible to participate in retail choice.

Now that data centers make up a substantial and growing share of energy use in the state, retail choice creates two financial risks to utilities and their customers.

- Utilities are required to build or secure enough generation to meet all customer demands. If a customer leaves the utility for retail choice, the fixed cost of any recently built generation is divided among the remaining customers. For example, the costs of constructing Dominion's recent Brunswick and Greensville power stations are paid for by all of its customers. If a substantial portion of data centers leave for retail choice, a greater share of those fixed costs will be allocated to remaining customers. The risk for this potential dynamic will be compounded in upcoming years because a lot of new generation is planned to be built to serve growing data center demand.
- Utilities also indicated that, because they are legally obligated to serve any customer in their territory as a provider of last resort, they must plan for the capacity needs of current and future customers. If utilities plan and build infrastructure to serve future data center customers, and some of those customers at some point leave for retail choice, the utility will incur costs for customers who are no longer actively paying generation bills.

It is difficult to model the cost impacts of data center customers shifting to retail choice, because it is unclear how many might pursue this option. However, utilities report that only a small number of data center customers are currently participating in retail choice, so there is the potential for many more to enter the program, especially as the industry grows. Dominion estimated that if all currently eligible customers chose to participate in retail choice, including non-data center customers, the cost-shift to other customers could exceed \$600 million annually (a \$150 per year cost impact for a typical residential customer). That figure is likely to grow substantially as data centers make up an increasing share of the customer base.

Before returning to their incumbent utility, a **retail choice customer must provide advance written notice of five years.**

However, statute allows the customer to return earlier by seeking an exemption from SCC if its energy supplier "has failed to perform, or has anticipatorily breached its duty to perform, or otherwise is about to fail to perform," and the customer is unable to obtain service at reasonable rates from an alternative supplier.

JLARC staff identified several ways the state could manage the financial risks of retail choice to residential and other customers. The General Assembly could direct utilities to determine an overall cap on retail choice participation for their customers, such as a total amount of the utility's customer load that could be obtained through retail choice and require SCC to review and approve the caps. This would provide an avenue for utilities and customers to present their cases and give SCC authority to decide what is appropriate. Other alternatives to this approach include requiring exit fees for customers leaving for retail choice or directing utilities to continue directly charging them for fixed generation costs (i.e., making these "non-bypassable" charges). In addition, the General Assembly should leave in place the existing legal requirement that any customer participating in retail choice must notify the utility five years before returning (sidebar). Requiring advance notice of at least several years is important so that utilities

can appropriately plan for system needs, secure needed capacity, and protect other customers from rate fluctuations.

POLICY OPTION 3

The General Assembly could consider amending the Code of Virginia to require that electric utilities establish caps on participation in retail choice that protect ratepayers from undue costs, and that such caps be approved by the State Corporation Commission through a formal case process.

Data center companies could soon have access to utility market-based pricing options that largely achieve the same goal as retail choice without shifting costs to other customers. Currently, co-ops already provide all their data center customers with market-based energy prices. Dominion has also established a small market-based rates pilot program and recently filed an application with SCC to make the program permanent and widely available to customers. Market-based rates provide customers with potentially lower energy pricing that is similar to what they could expect to obtain through retail choice, but they remain a utility generation customer and therefore continue to help pay for fixed generation costs (instead of having these costs passed on to other customers).

5 Natural and Historic Resource Impacts

Virginia has abundant natural and historic resources, which provide economic, environmental, cultural, and educational benefits to the state. The value of these resources has long been recognized by the federal, state, and local governments. Governments have established regulatory systems intended to protect these resources and reduce the impacts that land development and other human activity have on them. The extent of natural and historic resource protections varies by resource type, with some regulatory systems providing stronger protection than others (Table 5-1). Natural and historic resource protections apply to data center operations and developments just as they apply to other commercial and industrial operations and developments (sidebar).

Data center energy demand, and its related impacts on Virginia’s natural and historic resources, is discussed in Chapter 3 and related appendixes.

TABLE 5-1
Federal, state, and local regulations protect natural and historic resources from commercial and industrial operations and developments, such as data centers

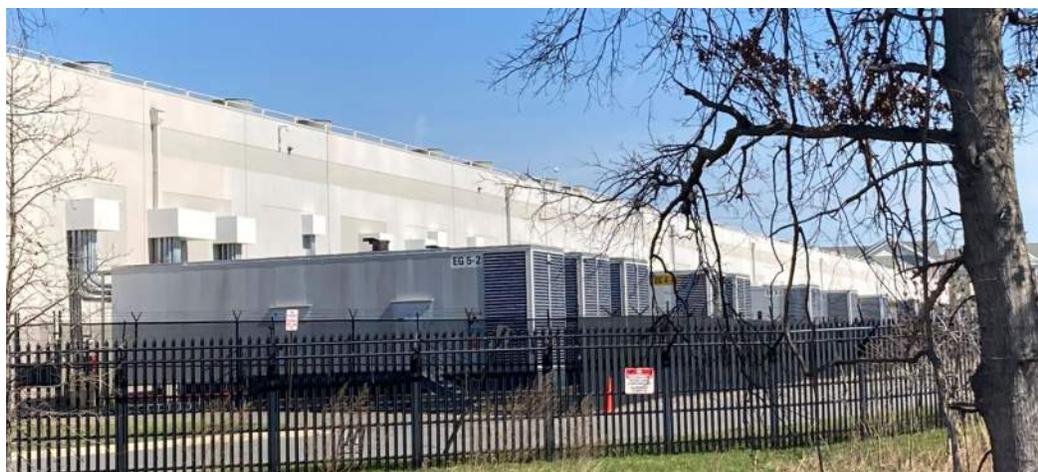
	Regulatory protections			Brief overview
	Federal	State	Local	
Air resources				
Pollutant emissions*	●	●	○	Federal and state governments regulate harmful emissions and concentrations
Water resources				
Water withdrawals*	○	●	○	State sets and enforces water withdrawal limits and conditions
Wastewater discharges*	●	●	○	Federal and state governments regulate harmful discharge contents
Stormwater runoff*	●	●	◐	Federal, state, and some local governments regulate runoff rate and quality
Wetland and stream disturbances*	●	●	◐	Federal, state, and some local governments require impact mitigation
Land resources				
Conservation	◐	◐	◐	All government levels set aside lands for conservation, but few regulations, outside voluntary programs, protect private lands
Electronic waste				
Disposal	◐	◐	◐	No regulations require reuse or recycling, but some disposal limitations exist
Historic resources				
Preservation	◐	◐	◐	Federal, state, and some local governments regulate impacts in specific circumstances

SOURCE: JLARC staff summary of federal, state, and local regulations, staff interviews, reports, and websites.
NOTE: ● = stronger mandatory protections, ◐ = partial mandatory protections, ○ = no mandatory protections. * indicates that permits are required for potentially sizeable impacts. The responsibility or authority for a given government level to regulate impacts varies by resource.

Data center backup generators emit pollutants, but their use is minimal, and existing regulations largely curb adverse impacts

To ensure constant operations in the event of a power outage, data centers maintain on-site backup power. Data centers report that providing uninterrupted operations is extremely important to their customers, which can include banks and hospitals, who expect no outages or downtime. In Virginia, nearly all data centers use diesel generators for backup power (Figure 5-1). On average, each data center site has 54 permitted generators, but the number and electrical capacity of these generators vary widely depending on the number of data center buildings at a site, overall power and redundancy needs, and the sizes of generators used (typically one to three megawatts per unit). In total, the industry has approximately 8,000 permitted generators throughout the state.

FIGURE 5-1
Data centers rely on diesel generators for power in the event of an outage



SOURCE: JLARC photo of diesel generators at a data center in Virginia.

The federal Clean Air Act requires the U.S. Environmental Protection Agency to set **National Ambient Air Quality Standards**.

These standards identify safe concentration thresholds for six pollutants—including ozone (which nitrogen oxides may form), carbon monoxide, and particulate matter—based on scientific evidence.

Diesel generators emit several harmful pollutants, so their commercial use is regulated by state and federal agencies. The main emissions are nitrogen oxides, carbon monoxide, and particulate matter. When highly concentrated in the air, these emissions can have adverse effects on public health and the environment. Exposure to high concentrations of diesel generator emissions can affect human cardiovascular, respiratory, and central nervous systems. Nitrogen oxides, which diesel generators emit in much larger quantities than other pollutants, can contribute to ground-level ozone pollution (including smog) and acid rain.

To prevent harmful concentrations, Virginia's Department of Environmental Quality (DEQ) is required by federal and state law to regulate sizeable emissions of these pollutants and enforce National Ambient Air Quality Standards (sidebar). DEQ requires

diesel generators used by data centers to be permitted, primarily because of their nitrogen oxides emissions (sidebar). Moreover, DEQ monitors air quality and creates plans to maintain or attain National Ambient Air Quality Standards across the state. For instance, Northern Virginia has historically struggled to meet the standard for ozone, to which nitrogen oxides can contribute, so DEQ has stricter policies for nitrogen oxides emissions in that region.

Data center backup generators are rarely run for prolonged periods, and emissions are unlikely to adversely affect regional air quality

Data center operators aim to have backup generator capacity for days-long outages, but in practice, the generators are rarely run for prolonged periods. Most operators reported experiencing zero to two minor outages per site in the last two years, with nearly all outages being between one and five hours long. Otherwise, generators are typically run only for limited amounts of time as part of routine maintenance (sidebar). For example, in 2023, the industry's actual emissions were only 7 percent of what permits allowed, with most emissions coming from maintenance testing.

On a regional level, data center emissions from diesel generators have grown substantially in recent years, but they remain a relatively small contributor to regional air pollution. Since 2015, nitrogen oxides emissions from data center diesel generators have more than doubled, carbon monoxide emissions have tripled, and particulate matter emissions are five times larger. However, these emissions make up a small part of overall emissions in the region. Based on National Emissions Inventory data, in Northern Virginia, where most data centers are concentrated, data center emissions make up less than 4 percent of regional nitrogen oxides emissions and 0.1 percent or less of regional carbon monoxide and particulate matter emissions. Overall, air quality in Northern Virginia has improved during the same time that the industry has grown, as reductions in car and other emissions have been greater than data center emission growth.

While emissions from data centers' diesel generators make up a small part of *regional* emissions, understanding whether they have adverse *local* impacts is more difficult. Because the data center industry's large clusters of diesel generators are unique, local air quality impacts are harder to assess. Diesel generators' intermittent use makes their impacts difficult to model, and no other type of development uses nearly as many generators on one site as a data center development. Additionally, air quality monitoring occurs regionally and does not effectively capture localized effects. While DEQ staff believe that data centers' intermittent use and low emissions levels are unlikely to cause adverse impacts, the agency has recently launched a three-year study that will directly monitor data center generator emissions in Northern Virginia to more fully understand their air quality impacts. If the study detects any local air quality impacts, DEQ has the authority to increase protections as needed.

DEQ permits are required for any new development that may annually emit over 40 tons of nitrogen oxides, 100 tons of carbon monoxide, or 10–25 tons of particulate matter, depending on the particulate matter size. Data centers using diesel generators usually meet the criterion for nitrogen oxides, but not for the other pollutants.

Data center operators indicated that **maintenance testing** typically involves a short (10–30 minute) monthly test and one long (one- to four-hour) annual test. Testing of generators is staggered across a site on an individual or group basis.

Federal and state regulations limit potential emissions from backup generators, even under worst-case scenarios

The U.S. Environmental Protection Agency has established **generator tiers** based on emission rates, or the amount of a pollutant emitted by a source over a given amount of time. Data centers could use generators that are considered Tier 2 or Tier 4.

DEQ permits limit when data center generators can be run, how long they can be run, and the maximum annual emissions each permitted site is allowed. Nearly all current data centers use “Tier 2” diesel generators, which are only permitted to run in emergencies or as part of routine maintenance testing (sidebar). This restriction prevents data centers from running their generators for any other reason. Permits are issued per data center site, rather than per building or generator, and cap the total emissions allowed per site. For example, a data center campus would not be allowed to run its generators indefinitely, even in an emergency, because it would likely reach its emissions limits within a few days. Because outages are rare, data centers do not often approach their emission limits. (For information on data center generator fuel choice, see Appendix K.)

In the event of a prolonged outage that affects one or more Northern Virginia counties, any affected data centers could reach their emission maximum within a few days and potentially affect regional air quality. For example, under a worst-case scenario where all data centers in Northern Virginia reach their maximum allowed emissions, data centers would emit over 9,000 tons of nitrogen oxides in the region. That is equal to about half of what has typically been emitted annually in Northern Virginia by all sources. Such a large-scale outage could potentially result in violation of air quality standards and contribute to regional air quality issues. However, the extent of any impact would depend on weather patterns and contributions from other emissions. Such large-scale outages are rare, and air quality levels would return to normal after the event is over.

General Assembly could incentivize use of generators with lower emission rates to reduce risk of local and regional impacts during prolonged power outages

To reduce the risk of air quality impacts from data centers during a prolonged outage, the state could incentivize the industry to adopt technologies that reduce potentially harmful emissions. “Tier 4” diesel generators are designed to emit significantly less nitrogen oxides and particulate matter than the “Tier 2” generators most data centers use. Alternatively, Tier 2 generators can be equipped with selective catalytic reduction systems (SCRs). Both technologies can significantly reduce emissions of nitrogen oxides and particulate matter—reportedly by up to 90 percent—over long run times. Some newer data centers in Virginia use SCRs on their generators, and only one uses Tier 4 generators.

Without state incentives, data center companies are unlikely to change their backup power choices. Tier 4 generators and SCRs are more costly, and data center companies have expressed concerns about the extra complexity and the current availability of Tier 4 generators to meet campuswide and statewide backup power needs. The state

could encourage adoption of these technologies by requiring new data centers in the Northern Virginia Ozone Nonattainment Area to use Tier 4 or SCR-equipped Tier 2 generators to be eligible for the state’s sales and use tax exemption (sidebar). This requirement could be phased in over time to account for data centers that have already ordered generators or otherwise made investments that would not comply with this requirement.

The Northern Virginia Ozone Nonattainment Area includes Arlington, Fairfax, Loudoun, and Prince William counties and the cities of Alexandria, Fairfax, Falls Church, Manassas, and Manassas Park.

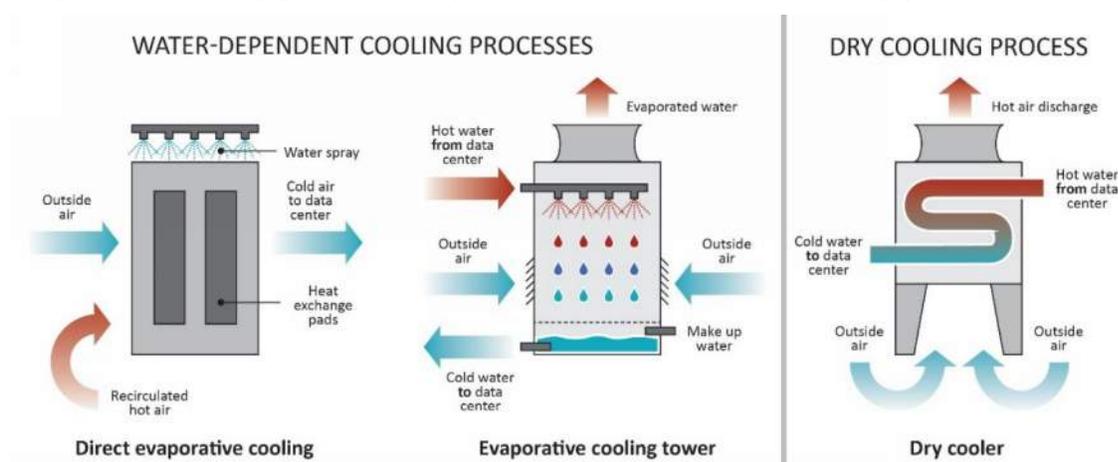
POLICY OPTION 4

The General Assembly could amend the Code of Virginia to require that, as a condition of receiving the data center sales and use tax exemption, all new data center developments in the Northern Virginia Ozone Nonattainment Area use only Tier 4 generators, Tier 2 generators with selective catalytic reduction systems, or generators with equivalent or lower emission rates.

Data center water use is currently sustainable, but use is growing and could be better managed

Data center water use varies depending on the data center’s size, computing density, and type of cooling system. Data centers require industrial-scale cooling to manage the heat generated by their computing equipment. Some cooling systems use water evaporation, and these systems typically require regular water refills to operate (Figure 5-2). Other cooling systems recirculate all or most of their water, similar to a radiator, and use relatively little water. Some data centers use a combination of cooling processes, including processes that do not require any water.

FIGURE 5-2
Evaporative cooling processes require more water than dry cooling processes



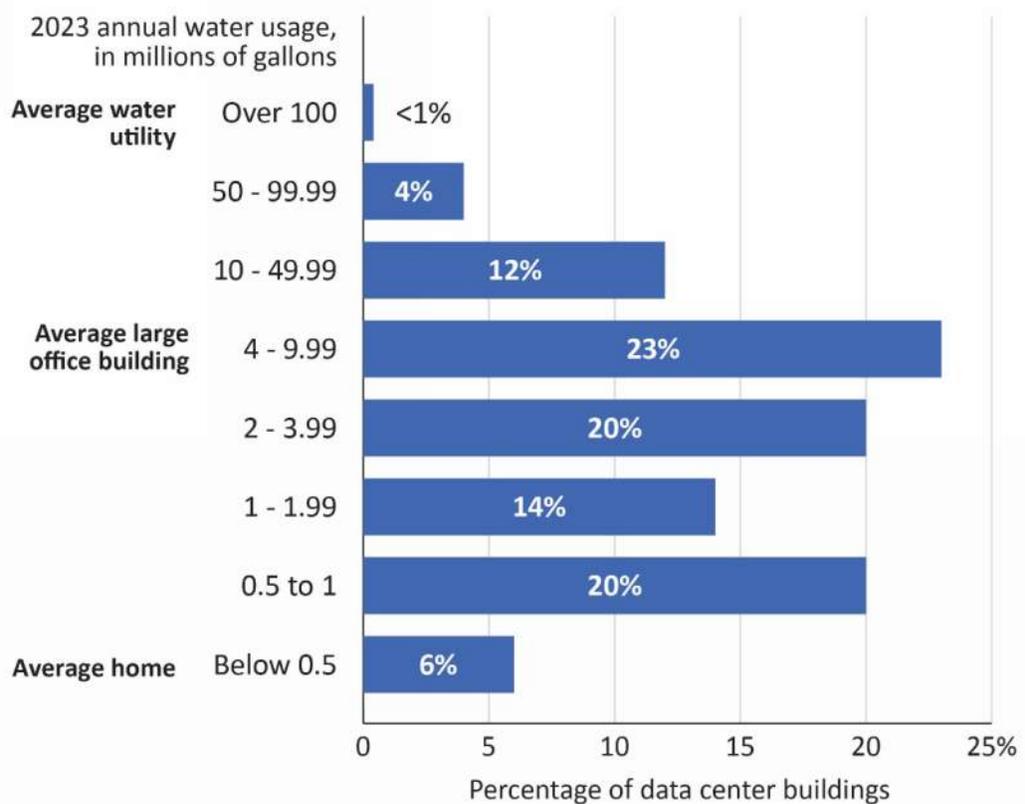
SOURCE: JLARC synthesis of interviews, government reports, and research literature.
 NOTE: Depicted examples are generalizations and do not include all data center cooling processes and equipment.

While some data centers use substantial amounts of water, most use similar or less than other large commercial and industrial water users

For comparison, the state's largest industrial water user in 2023 used about 36.5 billion gallons of water annually.

Based on available data, most data centers use about the same amount of water (or less) as an average large office building (6.7 million gallons per year), although a few require substantially more, and some require less than a typical household (Figure 5-3). In 2023, 11 data center buildings each used over 50 million gallons, including one building that used 243 million gallons (10 percent of the industry's total use) (sidebar).

FIGURE 5-3
Annual data center building water use varied widely, but most used the same amount of water as an average large office building or less (2023)



Reclaimed water is wastewater that is treated, often to a non-potable standard, and re-used, such as for irrigation and industrial purposes. It reduces the need for additional water withdrawals, diverts wastewater from entering water sources, and reduces demand on potable water systems.

SOURCE: JLARC staff analysis of data provided by water utilities serving Fairfax, Henrico, Loudoun, Mecklenburg, and Prince William counties and the Town of Wise. Average uses are based on federal and state water use statistics. NOTE: Data was not available for all data centers in Virginia but was for the large majority. Water use is on a per building, not per campus, basis. Annual usage for some data center buildings is approximate because of data constraints.

Cumulatively, data centers use a small share of statewide water withdrawals and a moderate share of some region's water withdrawals. In 2023, the data center industry used an estimated 2.1 billion gallons of water, with just over a third coming from reclaimed water instead of new withdrawals (sidebar). Data center water use accounted for less than 0.5 percent of total state withdrawals.

The industry's impact was also limited regionally. Most data centers are served by water utilities, and industry use made up from 0.2 to 21 percent of water use, after excluding reclaimed water use, at the six water utilities JLARC staff reviewed. Data centers were typically one of these water utilities' larger customers, but a data center was the single largest customer for only two utilities.

State regulates water withdrawals to ensure future water availability and to protect water ecology

To protect future water availability and environmental sustainability, DEQ regulates withdrawals from Virginia's water sources, including requiring permits for large-scale withdrawals (sidebar). Withdrawals can reduce the amount of water that is available for future use if it is withdrawn faster than it is naturally replaced. Additionally, they may affect aquatic flora and fauna, such as by reducing available habitat. Most data centers receive their water from local water utilities, which make the withdrawals. In these cases, DEQ ensures that data centers' water use is sustainable through permitting the utility's withdrawals. Only two data centers have their own DEQ withdrawal permits, and any data centers that do make their own withdrawals are subject to the same regulations as water utilities.

To determine appropriate water withdrawal allowances, DEQ performs scientific modeling that evaluates water withdrawal impacts on future water availability and aquatic flora and fauna in that water source. Permits specify withdrawal limits and set other conditions, such as requiring the permit holder to limit withdrawals during droughts. If a requested withdrawal amount would exceed sustainable levels, DEQ would issue a permit only for a sustainable amount or add conditions to the permit that ensure sustainability. Permits must be renewed at least every 15 years, at which time DEQ reruns the water model with updated water source condition data. If growing data center demand prompted a water utility to seek a larger withdrawal than their permit currently allows, the requested permit withdrawal allowance increase would also have to be modeled by DEQ.

Data center water needs are likely to increase as the industry grows, and state and local governments could help ensure limited water resources are used effectively

While DEQ is responsible for ensuring that permitted water withdrawals are sustainable for the water source, there is less oversight over how available water should be shared across various uses. While the state as a whole is relatively water rich, water is a limited resource for some Virginia localities, such as those that do not have access to major rivers or other surface waters and are in groundwater management areas. Additionally, when local water use demand exceeds current permit or infrastructure thresholds, utilities may need to expend significant resources to meet the additional demand (sidebar). Therefore, localities should fully consider their allocation of available water. For instance, when reviewing a potential new development that may use a

Withdrawal permits are required for withdrawals above 10,000 gallons per day from non-tidal surface waters, two million gallons per day from tidal surface waters, and 300,000 gallons per month from groundwaters in a groundwater management area. There are some exceptions for users that pre-date these regulations. Withdrawals that do not require permits may still require annual reporting.

Some water utilities that serve or will soon serve data centers have recently expanded their permits and/or infrastructure. For instance, five have requested new or larger withdrawal permits, though these expansions are not fully attributable to data centers. Water utility staff shared that data centers pay their fair share for any additional infrastructure they require.

large amount of water, a locality should consider whether the project could affect the locality's ability to meet future residential demand or pursue other types of economic development.

State could clarify localities' authority to request potential water use information from proposed developments

While any large water user has the potential to affect local water availability, water use information may be particularly helpful for zoning decisions for data center developments. Data centers can use a relatively large range of water amounts compared with other land uses. Some companies will continue to build data centers that use water for cooling, and potentially larger amounts of water as cooling needs increase. While others are moving away from water, the industry's net water use is expected to increase. In addition, because the industry is growing rapidly and typically grows in clusters, data center water use in a given locality can grow suddenly.

Localities have general statutory authority to consider water resources in their land use planning, but state law is not clear on localities' ability to require a proposed data center development to provide a water use estimate or to consider water use in their rezoning and special use permit decisions. (Rezoning and special use permits are discussed more in Chapter 6.) In interviews, local planning staff, government attorneys, and a local elected official conveyed different understandings of the law or reported being uncertain whether a locality could consider water use estimates when evaluating data center development projects. This information could be helpful for assessing a development's potential impacts, but data center developers can be reluctant to share this information because of proprietary concerns. State law should clarify localities' authority to require this information from data center developers and consider water usage in their rezoning and special use permit decisions. This clarification could potentially be extended to other development types, such as other developments with the potential to use large amounts of water.

RECOMMENDATION 6

The General Assembly may wish to consider amending the Code of Virginia to expressly authorize local governments to (i) require proposed data center developments to submit water use estimates and (ii) consider water use when making rezoning and special use permit decisions related to data center development.

Additionally, if local planning officials have this information, they should consult with their local water utility—prior to approving data center developments—on the impact these developments could have on the utility or future water availability. In some data center approvals, this information was not shared between parties. Doing so could help to ensure water use impacts are fully understood prior to approving the development.

Increasing use of reclaimed water may help reduce impacts on water resources

Some utilities offer reclaimed water systems for their customers, and using reclaimed water instead of potable water for cooling, including evaporative cooling, is generally a best practice for data centers. Reclaimed water can reduce a development's impact on water resources because it does not require additional water withdrawals and can decrease wastewater discharges. DEQ currently permits only two water utilities, including Loudoun Water, to provide reclaimed water for evaporative cooling uses.

Reclaimed systems may not be viable or available in all localities, but utilities that serve data centers should consider the option. Smaller utilities may not create enough wastewater for a reclaimed system that could sustain data center operations. Moreover, financial considerations may also limit reclaimed water use, as reclaimed systems have high capital costs. However, because of the potential benefits for water availability, utilities that serve data centers—and other large water customers—should consider the viability of using reclaimed water systems, as well as potential opportunities for data center companies to help with upfront costs.

Some stakeholders, including a data center company and several water utilities, indicated that Virginia's reclaimed water system regulations for evaporative cooling use are difficult to meet or confusing. DEQ indicated that regulatory changes, such as explicitly listing minimum standards for reclaim water use in data center evaporative cooling processes or reducing some treatment and monitoring conditions, could potentially address concerns while maintaining necessary safeguards but would require further review. DEQ is already scheduled to conclude an internal review of these regulations by September 2026 as part of its quadrennial review process, but DEQ could start this review now so that any eventual changes could be implemented a year earlier. Any potential changes DEQ identifies would need to be implemented through the standard regulatory process—including a Notice of Intended Regulatory Action and public comment period.

Data center construction has similar land and water impacts to other large developments, and state and local regulation mitigate most effects

The development of land for industrial, commercial, or residential uses, particularly “greenfield” developments, can affect Virginia's land and water resources (sidebar). Depending on the characteristics of the site being developed, the construction process may change land characteristics and uses, modify stormwater runoff patterns, and/or disturb wetlands and other waterways (Table 5-2). Such impacts can degrade air and water quality, destroy wildlife habitat, and increase flooding and erosion risks.

A development's ability to mitigate its potential impacts depends on the site, development type, and the resource. A development can mitigate overall potential impacts on these resources in three ways:

“Greenfield” development occurs on land that has not previously been developed. In contrast, redevelopment occurs on the site of a former development. A redevelopment is less likely to impact land and water resources, as any potential impacts likely already occurred during the previous development.

State-managed databases, such as the Department of Conservation and Recreation's **Natural Heritage database**, identify on-site resources that may be impacted by development.

- **avoiding** direct impacts to the maximum extent practicable, such as not constructing a building on forested land,
- **minimizing** impacts to the maximum extent practicable, such as using a retaining wall to minimize impacts to an adjacent waterway, or
- **compensating** for any impacts that do occur, such as offsetting impacts to a wetland by restoring or constructing that same type of resource elsewhere.

TABLE 5-2
Constructing new developments can result in loss of undeveloped and agricultural lands, create stormwater runoff risks, and potentially disturb wetlands

	Land resource loss	Stormwater changes	Wetland disturbances
Development action	Undeveloped and agricultural lands may be developed for industrial, commercial, residential, or other uses.	Impervious surfaces may be created to support buildings and ancillary developments.	Wetlands (including streams and other waterways) may be drained, filled, or encroached upon to maximize developable area.
Potential impact	Forests, agricultural lands, and other green spaces are lost.	Less rainwater is absorbed into the ground, increasing stormwater runoff.	Wetland areas are destroyed, diverted, or otherwise disturbed.
Effect without mitigation	Air, water, and soil quality degradation, loss of habitat, and lower agricultural production occur.	Increased flooding and erosion, water pollution, and slower groundwater recharge occur.	Water source degradation, loss of habitat, and increased flooding and erosion occur.
Effect with mitigation	Losses are avoided, minimized, or offset by preserving, creating, or restoring lands elsewhere. ^a	Predevelopment runoff rate and quality are maintained, minimizing adverse impacts.	Disturbances are avoided, minimized, or offset by funding or implementing wetland creation or restoration. ^a

SOURCE: JLARC synthesis of interviews, government reports, and other information.

NOTE: ^aOffsetting impacts can be difficult and require significant time and space, particularly for replacing lost undeveloped and agricultural lands.

Some regions have seen substantial data center growth, but their construction impacts are similar to other large developments

Data center development has construction impacts that are similar to other large-scale developments' impacts. While comprehensive information on data centers' impacts to natural resources is not tracked, the vast majority of their development is greenfield development—although some redevelopment is also occurring.

The development pressures from data centers on undeveloped and agricultural lands statewide are not more than other fast-growing developments in Virginia. For example, the total land area of currently operating data centers is equal to about 1.4 percent of the farmland lost in Virginia between 2017 and 2022. According to land conservation experts, the current primary threat to undeveloped and agricultural lands is solar energy developments.

On a regional level, however, the share of undeveloped and agricultural land development in Northern Virginia attributable to data centers has been substantial. JLARC staff estimated that the data center industry accounted for between 20 and 30 percent of land development in Loudoun and Prince William counties from 2013 to 2021, and the amount of data center development has already increased 50 percent since then. However, these are some of Virginia's fastest-growing counties, which means that some portion of land developed for data centers likely would have been developed for other uses, such as housing, mixed-use commercial space, or distribution centers.

Data center developments have similar impacts on stormwater and wetlands as other large-scale developments, such as warehouses or shopping centers. The magnitude and significance of impacts depend on site characteristics as much as the development itself (sidebar). Therefore, impacts may be the same whether a site is developed for a data center or another land use.

State and federal regulations require mitigation of stormwater and wetlands impacts, but land conservation is at local discretion

Federal and state regulations require stormwater management and wetland permits for sizeable impacts, regardless of development type. Stormwater permits for individual developments are usually administered by DEQ or the locality, and wetland permits are typically jointly issued by the U.S. Army Corps of Engineers and DEQ. Most data center developments require a stormwater permit because of their size, but only those that affect a wetland or other waterway require a wetland permit (which is the same for all types of development).

Stormwater management permits require developments to manage their stormwater runoff to meet water quality and quantity requirements to minimize impacts. For instance, a development would be required to install a stormwater management system, such as an on-site stormwater pond, to slow and filter its runoff. Data centers create a relatively large amount of impervious surface, and stormwater permits require management that is proportional to the addition of impervious surface and land cover changes. Some impacts may still occur even if all permit requirements are met, such as less water being absorbed into the ground or water source temperature increases, but these same impacts can occur from any developments that create large impervious surfaces or change land cover, such as a warehouse or shopping center.

Wetland permits require developments to avoid and minimize impacts to wetlands and other waterways to the maximum extent practicable and to compensate for any remaining significant impacts. Because data centers require large building footprints, they may be relatively less able to avoid or minimize impacts. However, any significant impacts that do occur require proportionate compensation, which ensures losses are replaced to the extent possible through the preservation, restoration, or creation of that resource elsewhere.

In Virginia, federal and state regulations do not require mitigation of impacts to undeveloped and agricultural lands. Localities have full discretion through their zoning laws

Magnitude of impact depends on the change to the environment, not the development itself. For example, a small green-field development may create more impervious surface than a large redevelopment.

Impact significance depends on the resource that is affected. For example, a given amount of water pollution may have a larger effect in a small river than a big river.

to determine how lands that are not protected from development can be used. While localities can require, negotiate, or accept offers to conserve a portion of the existing natural landscape as part of a development, data center developments generally use most of land that is practicable and allowed to be developed. Because undeveloped and agricultural lands are difficult to replace, the primary mitigation method to protect them is to avoid or minimize development on these lands. The state could consider imposing land use restrictions to prevent or minimize the land impacts from data center development, but this would be a profound change in the state's involvement in local land use decisions, and, currently, there does not appear to be a basis for distinguishing data centers from other large developments in considering such restrictions.

State could require data centers to meet environmental management standard to receive tax exemption

The ISO 14001 standard for Environmental Management Systems is one of the most used environmental management frameworks in the world. The U.S. Environmental Protection Agency believes it helps organizations to systematically identify and reduce their environmental impacts.

Even though federal and state regulations already limit most negative natural resource impacts of data centers, the state could encourage them to meet an environmental management standard because of their large and growing presence. Environmental management standards, such as the International Organization for Standardization's (ISO) 14001 standard, require companies to proactively review and reduce their impacts to natural resources (sidebar).

Environmental management standards do not set required minimum standards but involve continuous improvement in operational sustainability. Required minimum standards may not be viable for all data center companies and may not be wholistically sustainable (sidebar). Environmental management standards call for companies to evaluate all of their environmental impacts and set and pursue sustainability goals. This process is repeated every few years and encourages a wholistic approach to sustainability. For instance, ISO 14001 seeks to promote organizational improvement in air emissions, water use, water discharge, waste generation, and energy consumption—all of which have been raised as concerns about data centers. (For more information on data center water discharges and waste generation, see Appendix K. For more information on data center energy impacts, see Chapter 3.)

Required minimum standards for specific resources could have unintended consequences, including: 1) not being viable for all data center companies, who have different operational systems and preferences, 2) not ultimately improving sustainability, such as water restrictions leading to more energy-intensive cooling, or 3) not being adaptable as the data center industry evolves, such as if new technologies shift the industry's environmental impacts.

The state could encourage adoption of an environmental management standard by making the state's sales and use tax exemption for both new and existing data centers contingent on adoption. Many data center companies already set sustainability goals and policies, and a well-designed state requirement would encourage other companies to adopt similar goals and policies. At least four other states—Arizona, Illinois, Iowa, and Washington—require data centers to meet a sustainability standard as a condition of their state data center tax incentive program.

POLICY OPTION 5

The General Assembly could amend the Code of Virginia to require that, as a condition of receiving the sales and use tax exemption, data center companies meet and certify to an environmental management standard, such as the International Organization for Standardization's 14001 standard for Environmental Management Systems.

Data center impacts on historic resources are similar to other developments, but current protections could be strengthened

Developments have the potential to negatively affect historic resources, both during and after construction. Historic resources can include sites (e.g., battlefields and cemeteries), structures (e.g., buildings), and objects (e.g., artifacts) (Figure 5-4). Impacts can vary substantially depending on the type of development being proposed, the significance of the historic resources affected, and how those resources will be affected. In many cases, a development will not adversely affect historic resources because there is nothing historically significant on the development site or located nearby.

FIGURE 5-4
Virginia has a wide range of historic resources



SOURCE: Image courtesy of the Virginia Department of Historic Resources (cropped by JLARC).

Data center developments can affect historic resources in the same ways as other large developments

Some data center developments have affected state historic resources. For instance, two data center developments have relocated or damaged cemeteries, and several have been located on historic sites, including a turn of the 19th-century residential site, a historic African American horse showground, and part of a Civil War battlefield. Additionally, several approved but not yet built data center developments have raised concerns of viewshed impacts on historic battlefields around the Northern Virginia region. Like with other development types, the total number and extent of data centers' impacts on historic resources are unknown as not all of these resources—or impacts to them—have been identified and catalogued.

Preservation experts consider data centers' impacts and risk of impact to be similar to those of other large-scale developments. Data centers have less flexibility than some other developments, like housing, to avoid building on parts of the property where resources might be located. Data center developments also require extensive grading, which can destroy buried structures and objects, and tall data center buildings are more likely to have viewshed impacts on nearby resources. However, other large-scale developments, like warehouses and shopping centers, can have the same impact. The rapid growth of data center development increases the likelihood that historic resources will be disturbed by these developments, but the same is true of other commercial and residential construction growth.

Pre-development studies help promote mitigation of impacts to historic resources

Various methods may be used to **mitigate impacts to historic resources**. For instance, developments may avoid or minimize impacts by moving building locations or lowering building heights. If historic resources cannot be avoided, they may be excavated and relocated, studied and documented before their destruction, and/or commemorated with signage. The appropriate strategy can depend on the resource, development type, and the site.

Before site development begins, sites can be studied to identify any potentially significant historic resources and determine mitigation strategies if impacts were to occur. Developers can hire experts or third parties to perform “Phase I” historic resource studies, which could include background research, physical inspection, and remote sensing, to identify historic resources that may be affected by a new development. If a Phase I study finds historic resources, Phase II historic resource studies can determine their significance and, if needed, develop mitigation approaches (sidebar). When needed, Phase III historic resource studies involve carrying out mitigation approaches, such as excavating and relocating a resource or documenting a resource. Once historic resources have been identified, developers can additionally perform viewshed analyses to determine whether a new development would be visible to these resources, potentially affecting their significance.

Phase I historic resource studies and viewshed analyses are relatively inexpensive pre-development tools. Some data center companies reported that they conduct Phase I studies for some or all of their data center developments, and several have conducted and shared viewshed analyses as part of the local zoning approval process. Studies can ultimately save developers time and money by preventing delays or the need for design changes from unexpected discoveries after developments have been approved.

Few legal or regulatory protections exist to protect historic resources, but pre-development studies could be more strongly encouraged

While there are many layers of federal, state, and local protections for natural resources, fewer protections exist for historic resources. For private developments, federal regulations require that historic resource impacts need to be considered—studied and potentially mitigated—only if a wetland or other federal permit is required. State law only requires additional Virginia Department of Historic Resources (DHR) oversight of private developments when human remains need to be removed.

Local regulation of historic resources varies by jurisdiction, depending on local capabilities and priorities. All localities have the authority to restrict development around

historic resources through their zoning ordinances, but some are better able to identify these resources than others. For instance, Loudoun requires Phase I historic resource studies for all non-residential developments and has a county archeologist who evaluates study results and makes recommendations to planning staff if additional action is needed. Most localities do not require pre-development studies and do not have an archeologist on staff. Moreover, when development and historic resource preservation goals conflict, it is up to local elected officials to make zoning decisions.

To ensure that potential impacts to historic resources are identified, the state could encourage Phase I historic resource studies for all new data center developments, as well as viewshed analyses for new developments within a certain distance of a registered historic site. To do this, the state could make eligibility for the sales and use tax exemption contingent on this work being performed for any new data center developments. For example, the state could require that, for any data center that begins construction in 2026 or later, the data center company perform a Phase I study (along with a viewshed analysis, if applicable) before the facility is constructed to be eligible for the exemption. Data center developers would pay for the study and report findings to localities, which would determine if any further action is required.

POLICY OPTION 6

The General Assembly could amend the Code of Virginia to require that, as a condition for receiving the sales and use tax exemption, data center companies conduct a Phase I historic resource study of a proposed development site, as well as a viewshed analysis when a proposed site is located within a certain distance of a registered historic site, and report the study findings to the appropriate locality prior to development.

Some localities may not currently have the time, expertise, or resources to review the Phase I historic resource study submissions. DHR could offer grants for localities to hire consultants or have staff available for consultation, but this would require additional funding or staff to implement. Alternatively, localities would have the option to require data centers to pay for a consultant hired by the locality to perform the review.

Some historic resource preservation experts stated that, while they would appreciate greater protections around historic resources, establishing mitigation requirements at the state level may not allow for site-specific characteristics or local preferences. For instance, prohibiting data center development near historic resources statewide, as was proposed during the 2024 legislative session, may be broader than needed—as impacts do not occur every time a development is on or near a historic resource—or could prove too restrictive given the abundance of historic resources in Virginia.

6 Local Residential Impacts

Local governments are responsible for managing land development in their jurisdictions for different residential, commercial, agricultural, and industrial uses. Localities manage development through planning and zoning to ensure developments conform with state and local laws and are grouped with appropriate types of development.

On the planning side, state law requires localities to create and update long-term comprehensive plans to support “coordinated” and “harmonious” development. These plans provide a strategic vision for development in the county but, while important for guiding local decisions, do not set any legal boundaries.

On the zoning side, localities pass zoning ordinances that set legal restrictions on development. Zoning ordinances establish conceptual *zones* (e.g., rural residential, light industrial), which have their own sets of rules and requirements for new development. For each zone, the ordinance lists *uses* that are allowed. Uses can allow different types of business operations (e.g., data center, brewery), different types of residential construction (e.g., townhouse, single-family house), and other distinct uses. Additionally, zoning ordinances can impose minimum requirements on specific uses or zones, such as maximum heights or mandatory setbacks from property lines.

Within a zone, a use can be allowed by right, allowed by special permit, or prohibited. If a use is prohibited in a zone, then a developer can seek to have the parcel rezoned to allow the use.

- **By right** uses are allowed within a zone without any special approval by the locality. For example, if data center development is a by-right use, a developer can build a data center in the zone without seeking special approval from the locality. Localities cannot require data center developers to do anything not already established in the zoning ordinance. For example, a locality could not require a by-right data center to be set back farther from nearby property lines than the ordinance already dictates.
- **Special permit** uses are allowed if approved by the locality’s elected officials, e.g., a county’s board of supervisors (unless they delegate this authority to the local board of zoning appeals), often following a public hearing. As part of the special permit process, the locality can make approval conditional on additional restrictions to mitigate negative impacts, such as bigger property line setbacks or lower building heights.

- **Rezoning** changes the conceptual zone a parcel falls under and therefore its allowed uses. Rezoning requests require a public hearing and approval from elected officials. Like with special permits, the locality can consider the developer’s willingness to conform to additional restrictions or actions as a condition of rezoning approval.

Growing number of data centers are being built close to residential areas, causing residential impacts

This chapter focuses on data centers’ impacts on residential areas. While minimizing impacts on **other sensitive uses** such as schools and parks is important, concerns of negative impacts in Virginia have primarily come from residential areas.

Land use planning principles state that neighboring property uses should be compatible with one another. These principles generally dictate that industrial uses should be far from residential and other sensitive uses because they are often incompatible (sidebar). Residential neighborhoods are generally expected to be safe, quiet, and pleasant places to live, whereas industrial facilities are often large, unsightly, and potentially noisy. For example, Loudoun County ordinances state that “industrial uses [...] are incompatible with residential uses due to the prevalence of outdoor storage and emissions of noise, odor, and vibrations.”

Data centers are industrial facilities that are largely incompatible with residential uses

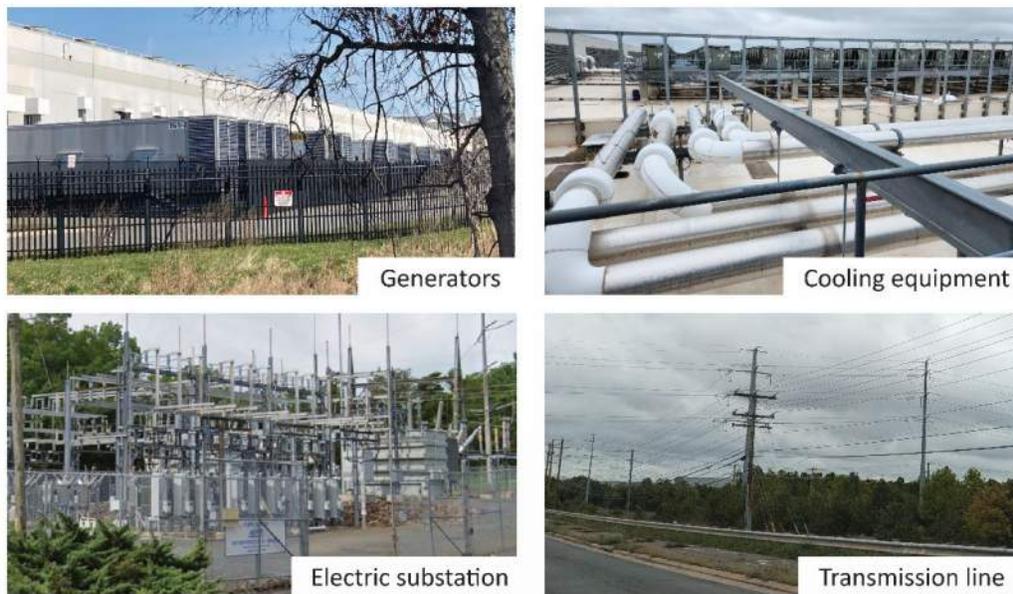
The industrial scale of data centers makes them largely incompatible with residential uses. A modern data center site includes one or more large, industrial buildings, similar in size and appearance to a new distribution center or a manufacturing facility, which is an abrupt contrast to a residential home.

Other components of data center sites are also industrial in character and unsightly to residents who live close by (sidebar) (Figure 6-1). Trailer-sized generators (a median of 35 per site) are often lined up beside the data center building or housed in large generator sheds. Industrial-scale cooling equipment, such as chillers or water towers, often sit on the roof or outside the main building. Many data center sites are encompassed by security fences and deploy bright security lighting. Data centers also require industrial-scale electrical infrastructure. Sites will often include one or more electrical substations on or adjacent to the site, and some require above ground transmission lines extending from nearby main lines.

Resident descriptions of nearby data centers include:

- “a giant monolith in the wrong place”
 - “a prison”
-

FIGURE 6-1
Data center buildings and sites have industrial characteristics and infrastructure



SOURCE: JLARC staff photos and Google Earth.

Homeowners in residential areas close to data centers frequently express concern that having industrial sites nearby will decrease their property values. While it is certainly possible that nearby data centers have affected the resale value of homes, there is not yet evidence of this relationship. In interviews with representatives of neighborhoods opposed to nearby data centers and other informed individuals (sidebar), almost none observed a decline in property value or change in speed of home sales. One commonly cited explanation was that the tight housing market in Northern Virginia decreases buyers' selectiveness and so proximity to data centers has not yet had a noticeable effect on property values.

To assess data centers' impacts on property value, JLARC interviewed representatives of neighborhoods opposed to data centers proposed or recently constructed nearby, local stakeholder groups, county assessor's offices, and a local real estate agent association.

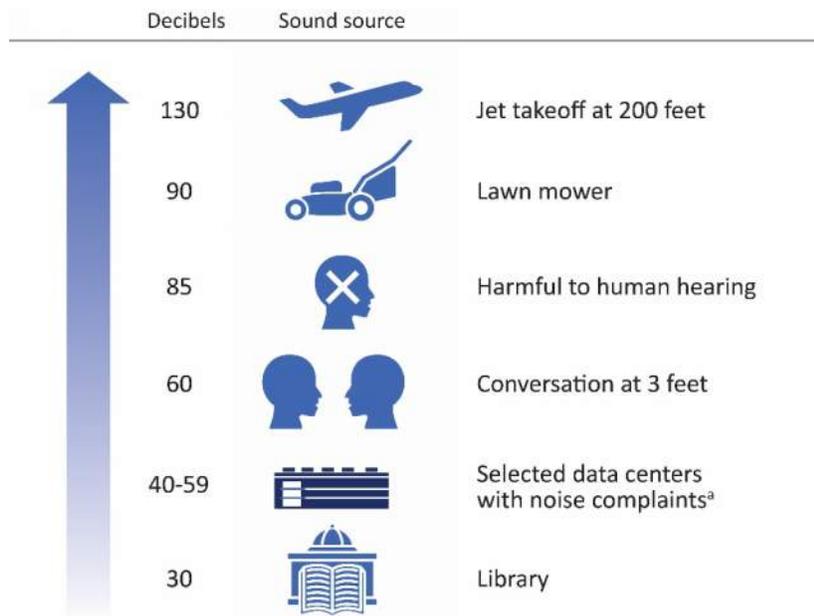
Some nearby residents report that constant noise from data centers affects their well-being

The constant nature of data center noise has been a reported problem when data centers are located near residential areas. Whether data center noise can be heard past the facility's property line depends on its design and its type of cooling system, which can cause noise. In addition, local geography and surrounding buildings can affect how sound travels.

While some data centers have been noisy enough to cause complaints, the noise is not loud enough to damage nearby residents' hearing and rarely loud enough to violate noise ordinances (Figure 6-2). Data center noise that has prompted resident complaints ranges from an estimated 40 to 59 decibels (per JLARC's review of noise measurements of selected data centers that have prompted complaints by residents). This

sound level is typically below the 55 or 60 decibel limit that Loudoun, Prince William, and Fairfax allow in their ordinances for residential areas. Rather than the volume of the noise, it's data centers' constant noise that some residents consider problematic. Data center noise is described as a constant “drone” or “hum,” similar to house air conditioning systems but magnified to an industrial scale. The noise can sometimes be heard both in and outside of nearby residences.

FIGURE 6-2
Data center sound is noticeable but quieter than many common sounds



SOURCE: JLARC review of Occupational Safety and Health Administration, U.S. Centers for Disease Control and Prevention, and Federal Aviation Administration websites, and analysis of complaint data from Fairfax and Loudoun.
 NOTE: The units are A-weighted decibels. ^a Encompasses measurements at locations where local staff recently measured data center noise using A-weighted decibels. Measurements are a response to complaints, so they are not representative of all data centers. Measurements indicate total sound, not the isolated amount from data centers.

Residents who have reported that data center noise is a problem have indicated that it has adversely affected their well-being. JLARC staff spoke with residents who live near data centers that have been the subject of noise complaints to learn how the noise affects them. Some residents described physical symptoms such as migraines from the facilities' constant noise. Others said that they experience health problems caused by disrupted sleep, and some residents described an inability to concentrate on tasks. A common theme was poorer quality of life, with some residents avoiding their decks and yards because the sound is louder outdoors.

Data centers are not required to reduce their noise if they are not violating local ordinances, which has made it difficult to address noise concerns. Some neighborhoods have attempted to address concerns through the county and engagement with data center companies. Residents of the Great Oak neighborhood in Prince William reported noise to county police from a nearby data center in May 2022, and as of

October 2024, the issue had not been fully addressed by the data center owner to all residents' satisfaction. Residents of the Brook Haven neighborhood in Loudoun contacted the county in 2021 about noise concerns, and the data center completed an attempted solution in November 2023. In both cases, residents observed reductions in noise from the nearby facilities but emphasized it took time and repeated communications from residents to prompt action.

Data center construction sites can be especially disruptive to nearby residential areas

Because of data centers' size and scale, their construction takes a long time and is disruptive to residential areas. Construction activities typically include clearing trees, grading land, laying foundations, erecting buildings, and installing equipment. While these activities are not unique to data centers, the impacts on residents are especially large because of the projects' scope. Each building takes about 12 to 18 months to construct, and with the industry moving toward developing data center campuses, work on additional buildings often begins as soon as one is completed. Therefore, a large site could take as long as seven years to fully complete. This work requires thousands of workers on site and substantial truck deliveries of materials.

Some residents report they have been negatively affected by data centers' construction. Their concerns include loud construction noises and vehicle traffic. For example, one neighborhood's main access road was damaged by frequent use of heavy vehicles, which reportedly sometimes blocked school buses and emergency vehicles.

One-third of data centers are near residential areas, and industry trends make future residential impacts more likely

The majority of data centers are appropriately located in industrial or commercial areas and are not close to residential uses. Over 60 percent are more than 500 feet from residential-zoned properties (as measured from property line to property line, meaning the actual facility and residences are even farther apart) (sidebar). The farther away a data center is from residential areas, the less likely it is to affect nearby residents.

A minority of data centers have generated noise complaints. At least 15 data centers (10 percent of operational data center sites) appear to have generated noise that nearby residents regard as problematic, according to resident groups and government records.

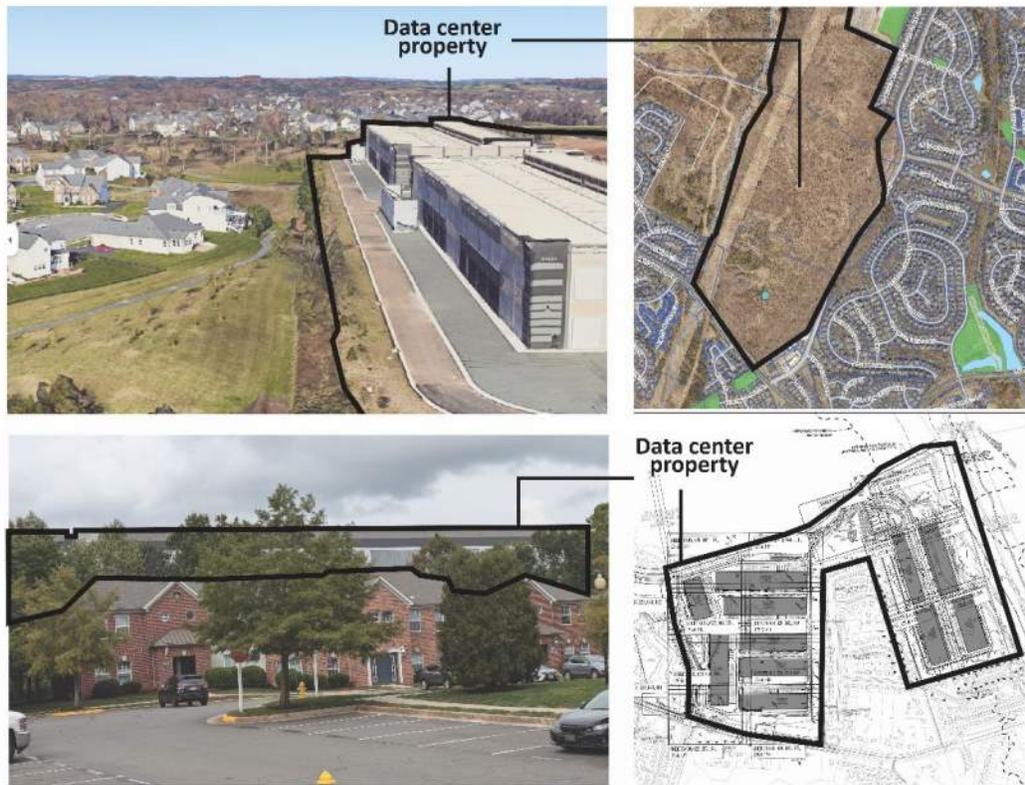
However, the number of data centers being built near residential areas is increasing. Almost one-third (29 percent) of operational data center properties in Virginia are within 200 feet of residentially zoned properties. Currently, there are several data centers being constructed adjacent to single-family homes, townhouses, and apartment complexes. Several recently approved data centers in Loudoun and Prince William will be built on land adjacent to neighborhoods, including at least two proposed developments where the property also abuts an elementary school (Figure 6-3). Other

Analysis of the proximity of data center properties to residential zoning used data from eight localities that account for nearly all (93 percent) data centers in Virginia. (See Appendix B.)

counties—such as Fairfax, Stafford, and Henrico—have also received proposals for data centers close to residential areas.

Trends in real estate availability and facility design increase the likelihood of future residential impacts. As the industry’s footprint in Northern Virginia grows, the amount of land ideal for data center development is decreasing, and developers are more likely to consider locations closer to residential and other sensitive areas. Additionally, the typical data center building is becoming taller, larger, and more power-intensive, which has the potential to make their industrial characteristics more pronounced and, depending on the design, could generate more noise.

FIGURE 6-3
Some recently built or approved data centers are close to residential areas



SOURCE: JLARC site visits, Google Earth, and locality websites.

NOTE: In order, the pictures depict: (1) existing data center from the Loudoun Meadows neighborhood of Loudoun, (2) land approved for Devlin Technology Park in Prince William, (3) an existing data center next to the Regency neighborhood in Prince William, and (4) a proposed site plan for property that was rezoned to allow data centers around the Amberleigh Station neighborhood in Prince William.

Localities have allowed data centers near neighborhoods, sometimes without sufficient mitigation of impacts

Appropriate local planning and zoning decisions can reduce the risk of data center developments affecting residents. Localities need to proactively update their planning and zoning to manage data center development, because the industry is rapidly changing. As recently as 10 years ago, data centers were much smaller facilities that were similar in size and appearance to commercial office buildings. Local ordinances that continue to treat data centers as non-industrial commercial uses, which are often allowed next to residential areas, are outdated and can affect residents.

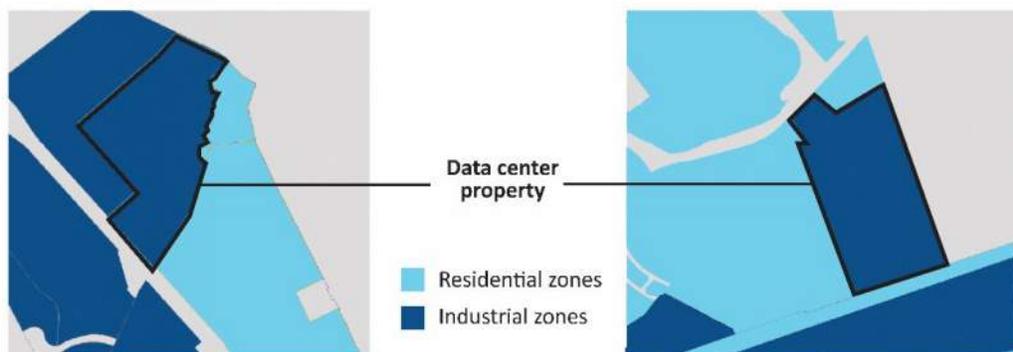
Localities need to consider which areas are appropriate for data center development, classify data centers as industrial uses in zoning ordinances, ensure data centers are not too close to residential zones, and include requirements to mitigate any potential negative impacts from data centers, such as building setbacks and height restrictions. In addition, local elected officials should adequately consider potential residential impacts when considering special permit and rezoning requests.

Inadequate planning and zoning have allowed data centers near residential areas

Data centers have sometimes been built too close to residential and other sensitive areas because local zoning ordinances did not consider them to be an industrial use. For example, until 2021, Fairfax considered a data center to be a telecommunications facility, which allowed data centers to be built in areas zoned for residential and office uses. Loudoun originally treated data centers as an office use and continues to allow by-right data center development in areas zoned for office uses in some parts of the county.

In addition, some localities have zoned industrial areas next to residential areas on their zoning maps, even though land use principles state that industrial uses are ideally separated from residential uses by buffers, such as commercial zones. For example, the Great Oak neighborhood in Prince William and the Bren Mar neighborhood in Fairfax are directly adjacent to industrial zones (Figure 6-4). This has allowed data center development by right despite being close to residences. The likelihood of residences being close to data centers has also increased because of some local decisions to rezone land to residential despite being in primarily industrial areas. If zoning maps are not reviewed and updated, more data centers are likely to be built closer to residential areas.

FIGURE 6-4
Some industrial zones border residential zones, allowing by-right data centers too close to residential zones



SOURCE: JLARC review of Prince William and Fairfax geographical informational systems and planning staff reports.
 NOTE: The first picture depicts an existing data center near the Great Oak neighborhood of Prince William. The second picture identifies a planned data center near the Bren Mar neighborhood of Fairfax County. Grey coloring indicates a zone that is (1) neither residential nor industrial or (2) within another locality. “Zones” refers to the official zoning classification in local ordinances.

Zoning ordinances often include requirements intended to mitigate negative impacts from businesses, but these requirements are not always sufficient. Required building height limits and property line setbacks are fundamental ways to reduce a development’s impacts. For example, the property on the right side of Figure 6-4 was zoned industrial and is only subject to a setback of at least 40 feet (although the developer is voluntarily planning a larger setback). This zoning would have allowed a new data center to be built close to the property lines of two adjacent townhouse complexes. Landscaping and architectural requirements are other ways to mitigate data center impacts, but their value is limited. Newly planted trees take decades to grow, and the size and proximity of a nearby data center matters more to residents than its architecture.

Some localities’ elected officials have granted data centers exceptions to requirements designed to reduce residential impacts

Local officials in Virginia have sometimes approved data center requests to build in locations that prompt resident opposition or are likely to cause impacts. These elected officials are responsible for reviewing applications for special permits and rezonings and ensuring they are compatible with the locality’s long-term comprehensive plan (or amending the long-term plan). While there is no objective way to assess if officials made the “right” decision in approving a given project, there are cases where elected officials’ decisions have led to impacts on residents or contradicted development strategies laid out in long-term plans. For example,

- Elected officials have approved property rezonings that allow data centers next to sensitive locations. Prince William approved rezoning from mixed residential to industrial for the Devlin Technology Park (second in Figure 6-3), which is adjacent to a school and about 80 feet from residential zoning.

- Elected officials have approved data center requests in areas that are not suitable, according to the locality’s long-term comprehensive plan. In Loudoun, the board of supervisors approved the True North development even though staff recommended denial because the county’s “transitional” long-term plan classification for the site does not support data centers (sidebar).
- Elected officials have exempted individual data centers from local requirements intended to mitigate negative impacts on residents. For example, Loudoun’s board of supervisors allowed Aligned Energy’s Relocation Drive project to exceed the zone’s maximum height and square footage, despite staff recommending against the exemption because of nearby residential areas.

Local planning staff can recommend denial for several reasons. Sometimes staff may recommend denial because they believe more information from the developer is needed before a decision should be made. Other times staff may recommend denial because the proposed use is not compatible with the proposed site or there are not sufficient mitigations planned to adequately protect nearby residents.

Some localities have taken steps to minimize residential impacts, though success of these efforts rests with elected officials

Residents’ opposition to data centers has grown in recent years, especially in Loudoun and Prince William. While data center projects rarely generated citizen opposition in the past, it is now more common for individuals and organized groups to speak against data center proposals at local planning commission and board of supervisor meetings. Some grassroots groups have been created to fight specific proposals for new data centers, joined by existing organizations such as regional environmental groups. These local groups often also advocate for more government restrictions on allowable locations for data centers.

Opposition to data center proposals has also emerged outside of the main Northern Virginia markets. For example, local groups contested recent proposals in Henrico County and the Town of Warrenton. However, some locations such as Mecklenburg have not encountered significant resident opposition.

Several Virginia localities are making or considering zoning ordinance changes to reduce the risk of residential impacts

Most of the Virginia localities with sizable data center markets have taken or are considering steps to better manage future data center development. Since 2019, elected officials in the three localities with the most data centers (Loudoun, Prince William, and Fairfax) have taken some steps to address residential concerns (Appendix L). For example,

- All three localities have increased the requirements for data centers to improve their appearance or reduce their visibility, for example, increasing setback requirements, requiring specific design standards for the building façade, or screening external mechanical equipment.

- Loudoun and Fairfax have reduced the number of zones allowing data centers by right.
- All three localities have taken steps to address noise, such as requiring sound studies for new projects, requiring proactive sound measuring for existing data centers, and eliminating a partial exemption in the local noise ordinance for nighttime noise from businesses (including data centers).
- All three localities recently initiated studies of their data center policies to better manage development. Fairfax's study concluded with elected officials amending their ordinances in fall 2024. Loudoun and Prince William are reviewing potential changes to their long-term comprehensive plans as part of their studies and tentatively plan to vote on study proposals in 2025.

In several of the Virginia localities that are considering or expecting their first data center projects, elected officials have proactively implemented planning and zoning changes to promote appropriate industry development. The goals of these changes are to avoid the types of residential impacts that have occurred in established data center markets. For example, in 2023, Stafford County added data center principles to its comprehensive plan, prohibited data centers in several commercial and light industrial zones, and established industry-specific standards. Culpeper County also coordinated amending its comprehensive plan and zoning ordinance relevant to data centers. Culpeper allows data centers in multiple industrial zones but provides tax incentives to encourage development in a newly designated Technology Zone with more stringent design requirements.

Localities generally have adequate expertise to make data center decisions

For the most part, local government staff possess sufficient expertise to support the review and approval of data center projects. Data centers are one of many types of development that local planning, permitting, and other staff evaluate. Evaluating whether a data center project is in an allowable location, has appropriate setbacks and building height, or is proposing effective landscape screening is similar to evaluating other large commercial or industrial developments. The one exception is noise, a topic where staff from several localities would like more expertise. For example, planning staff from a locality with data center experience are uncertain whether their recently revised ordinances are the right way to prevent data center noise impacts.

Data center applications can be challenging, however, for smaller counties with less experience with the industry, given the complexity, size, and scale of data center projects. These localities have addressed challenges by reaching out to staff in other localities with more industry experience and by contracting for tasks where their expertise may be lacking, such as assessing economic impacts. For some functions, such as reviews of stormwater management plans, the Department of Environmental Quality

may perform the review instead of the locality. Larger counties have sometimes used consultants as well, such as Prince William for a noise study.

Effectiveness of local efforts to minimize residential impacts ultimately depends on elected officials

The effectiveness of local efforts to minimize the residential impacts from data center development ultimately depends on elected officials. Local staff can propose well-designed zoning ordinance changes and provide sound advice on whether a special permit or rezoning request should be approved based on local development standards and the locality's comprehensive plan, but elected officials make the final decisions. As described above, elected officials in Fairfax, Loudoun, and Prince William have recently taken actions to minimize residential impacts of data centers, and several localities considering data center projects are taking actions proactively. While these actions do not guarantee elected officials will always make the "right" decisions to address impacts, they do indicate that elected officials are actively responding to residents' concerns.

State intervention does not appear warranted, but localities should consider using key practices in data center ordinances and decisions

Land use decisions are traditionally a local responsibility in Virginia, because they directly affect local residents. Land use decisions are also very site specific, and local governments are better positioned than the state to evaluate what is appropriate for a given site.

Nature of data center impacts does not appear to merit state intervention, and localities appear to be taking needed actions

Although some stakeholders have advocated for greater state involvement in land use decisions, there is not currently a compelling reason for a state role in setting local requirements for data centers or intervening in local approval decisions. State intervention should be considered only if local policies are causing significant threats to residents' health and safety or other significant harm, but that is not the case with data centers.

Furthermore, only a minority of data centers in Virginia have been reported to impose negative impacts on residents. While some localities have allowed data centers to be built in areas incompatible with residential uses, those localities now appear to be taking actions to avoid future impacts by reviewing and changing local zoning ordinances. Other localities that have not experienced negative impacts on residents yet appear to be taking proactive action to minimize impacts.

Localities should implement several practices to minimize residential impacts

Localities should implement several practices to protect residents and ensure data center development proceeds appropriately and with minimal impacts. Namely, localities should:

- classify data centers as an industrial use in their zoning ordinances;
- review the locations of zones allowing data centers by right, and adjust the zoning map if needed, considering proximity to residential areas;
- ensure that minimum requirements in the zoning ordinance adequately mitigate negative impacts on residential or other sensitive areas (e.g., setbacks, building heights), and add requirements specific to data centers as needed;
- identify optimal areas for data center development in the locality, including locations that are suitable from the county's perspective (e.g., far from residential areas) as well as the industry's perspective (e.g., large parcels, access to transmission);
- reduce the likelihood of noisy data centers (including through limiting allowable locations and requiring sound modeling) and prohibit the constant low-frequency noise of data centers from reaching residential areas; and
- require commitments from data centers making zoning requests to sufficiently mitigate negative impacts on any nearby residential areas.

Localities can take steps to mitigate data center noise, but some are unsure of authority to do so

Although only a few data centers have caused impacts to residential areas, noise is reported to be one of the most disruptive problems for residents, and data center noise concerns can be difficult to resolve. Noise impacts can be reduced by siting data centers away from residential areas and by modeling data centers' potential noise impact before they are built. Localities also need to be able to address noise that occurs after data centers are operational.

Noise concerns can be reduced by modeling data center sound impacts before a data center is built

In addition to having zoning ordinances that prevent data centers from being located close to residential areas, localities should require sound modeling for data centers proposed close to residential areas. Sound modeling predicts the sound a facility will generate once operational and provides an opportunity for building designers to assess the need for, and effectiveness of, sound reduction strategies. Localities could review study results to determine if any further action, such as sound barrier construction, should be required before approving a development project.

Sound modeling studies can also be used to establish the baseline level of noise already occurring around the proposed data center site, which can later be used to determine whether a data center has contributed to noise in the area. Many data center companies are now doing sound modeling studies for all or some of their projects, and companies explained that sound modeling prior to construction is worthwhile because reducing noise after a building is operational can be difficult and expensive.

Some localities were unsure whether Virginia law allows them to require sound modeling studies. Given this uncertainty, the Code of Virginia should be amended to clarify that local governments have the authority to require sound modeling studies by data center developers and to review and consider the results in their land use decisions.

RECOMMENDATION 7

The General Assembly may wish to consider amending the Code of Virginia to expressly authorize local governments to require sound modeling studies for data center development projects prior to project approval.

The state could incentivize sound modeling by making eligibility for the sales and use tax exemption contingent on this work being performed for any new data center developments proposed near residential areas. For example, the General Assembly could amend the law to require any data center company with a data center that is proposed to be constructed in 2026 or later near a residential area or area zoned for residential development perform a sound modeling study and provide the results to the appropriate locality in order to qualify for the exemption.

POLICY OPTION 7

The General Assembly could amend the Code of Virginia to require that, as a condition for receiving the sales and use tax exemption, data center companies conduct a sound modeling study prior to the development of a proposed data center that is to be located within a certain distance of a residential development or area zoned for residential development and provide the study findings to the appropriate locality.

Localities also need the ability to address noise issues that occur once a data center is operational

Localities also need to be able to address data centers' noise once they are operational, but local ordinances have been largely ineffective at addressing data center noise concerns. Most local noise limits are defined using "A-weighted" decibels (sidebar). This metric is designed to target excessively loud noise from sources such as parties and barking dogs. The lower frequency noise data centers emit is not fully captured in "A-weighted" decibels. Therefore, data center noise rarely exceeds the allowable limits set in ordinances, despite the constancy of the sound being problematic for residents. To effectively address data center sounds that cause resident complaints, localities could

"Decibels" are a pure unit of measurement of sound's volume. When measuring sound, different modifications can be used to account for various frequencies. For example, "A-weighted" decibels prioritize frequencies perceived loudest by humans and therefore reduce particularly low frequencies. "C-weighted" decibel measurements account more for low frequencies.

develop a supplemental noise limit defined using a metric that better accounts for low frequency sounds, such as “C-weighted” decibels.

Another challenge is that most localities address excessive noise in *noise ordinances*, and state law limits civil penalties for noise ordinance violations to \$500 after the first offense. Stakeholders have expressed concern that this small penalty is not sufficient to affect the behavior of the large companies that own data centers. Addressing noise limits through localities’ *zoning ordinances* would allow localities to better address data center noise. For example, the zoning ordinance could prescribe a process for measuring potential noise violations and penalties for not addressing them.

Some localities were unsure whether state law allows them to (i) establish maximum sound levels in alternative low frequency sound metrics and (ii) set noise rules and enforcement mechanisms in their zoning ordinances. The state should clarify that local governments have the authority to use these approaches to address data center noise.

RECOMMENDATION 8

The General Assembly may wish to consider amending the Code of Virginia to expressly authorize local governments to establish and enforce maximum allowable sound levels for data center facilities, including (i) using alternative low frequency noise metrics and (ii) setting noise rules and enforcement mechanisms in their zoning ordinances, separate from existing noise ordinances.

7 Potential Changes to Data Center Sales Tax Exemption to Address Policy Concerns

Virginia's data center retail sales and use tax exemption is a valuable incentive to data centers (providing \$928 million in savings in FY23), and about 90 percent of the industry (as measured by megawatts of power) uses the exemption. The General Assembly could therefore use the exemption to incentivize the industry to take actions that help address many of the concerns discussed throughout this report.

If consideration is given to amending the exemption, two factors should be considered. The exemption was adopted primarily to attract data centers to Virginia for economic development purposes, so any changes to advance other policy goals could make it a less effective economic development tool. The exemption is also consistent with tax policy principles that generally exempt businesses' production-related inputs (in this case computer and related equipment) and therefore provides equitable tax treatment with other capital-intensive industries that have business input exemptions.

Exemption changes could encourage continued data center growth, reduced energy demand, or a balance of these priorities

The data center industry provides positive economic benefits to Virginia (Chapter 2). However, a primary concern about the growing industry is the immense increase in energy demand it will require (Chapter 3), which could increase costs to other customers (Chapter 4). The state could consider changes to the exemption to maintain data center industry growth, reduce energy demand by reducing industry growth, or attempt to balance these two competing priorities.

Extending the exemption could help Virginia maintain industry growth and associated economic and local tax revenue benefits

The data center industry provides moderate economic benefits to Virginia and can provide localities that have them with substantial tax revenues. While economic benefits are concentrated in Northern Virginia, other regions of the state also benefit. For example, data center construction benefits equipment manufacturers and material suppliers in Tidewater, Southwest, and Southside Virginia. While historically only a few localities have benefited from data center tax revenues, the industry is rapidly growing. Data center projects are under development in at least 15 localities, most of which did not previously have data centers. Therefore, from an economic development perspective, the state may want to continue attracting the industry and maintain Virginia's position as a top global data center market.

The state’s data center sales tax exemption is scheduled to expire in 2035, and data center representatives unanimously reported that expiration of the exemption would have a negative impact on the state’s ability to attract new data centers and keep existing ones. Some companies indicated the expiration date could start to affect site selection and expansion decisions made in the next few years, because companies typically consider the costs of data center ownership over a 15- to 20-year period when making location decisions. Companies indicated that, without the exemption, the total cost of data center ownership and operation would significantly increase. Virginia is currently competing for new data center development with several other primary U.S. markets, almost all of which have data center exemptions. Without an exemption, data center representatives indicated any new development in Virginia would be limited to only what is “absolutely necessary,” and development would likely shift to other markets.

The 2023 General Assembly passed a **special data center sales tax exemption extension to 2040 or 2050** for companies that create 1,000 or 2,500 jobs (100 of which must meet above average wage requirements) and make a capital investment of at least \$35 billion or \$100 billion, respectively. So far, this extension applies to only one data center company, but several others may be interested in qualifying for this extension.

To help Virginia remain competitive, the state could extend the exemption’s expiration date. To influence future site selection decisions, an extension would need to be in place well before 2035. A reasonable new expiration year would be 2050, which would match the special extension that has already been created for companies that meet certain additional criteria (sidebar). The exemption should continue to have an expiration date, because this is considered an effective practice to ensure periodic scrutiny of its need and effectiveness.

POLICY OPTION 8

The General Assembly could amend the Code of Virginia to extend the expiration date for the state’s sales and use tax exemption for data centers from 2035 to 2050.

Extending the expiration date for the exemption, without making any other changes to it, would not address one structural issue with the exemption. Most of the economic benefits of the exemption occur during data center construction, but the exemption provides companies with substantial tax benefits in subsequent years after economic benefits have declined.

Allowing the exemption to expire could help reduce industry growth and associated energy demand

Virginia’s utilities have historically been able to keep up with energy demand, but even if data center energy use grows at only half the forecasted rate, the state will need to make enormous investments in energy infrastructure. While data centers will incur much of the cost of new infrastructure investments, energy rates for all users are likely to increase. Growing energy demand could also make it more difficult for the state to meet goals set forth in the Virginia Clean Economy Act.

If the General Assembly wishes to slow down the data center industry’s growth in Virginia because it determines that energy concerns outweigh the industry’s economic benefits, it could allow the sales tax exemption to expire in 2035. While it is difficult to gauge the exact effect this would have, it is likely industry growth would slow and

could eventually stop or even contract. If the industry contracts, it would reduce the need for future generation and transmission infrastructure but would actually increase energy costs paid by other ratepayers, who would have to share a larger portion of current systemwide costs. While the state could allow the exemption to expire only in certain localities or regions, like Northern Virginia, that approach would be less effective in reducing overall growth in energy demand. Industry growth is occurring in several counties outside of the Northern Virginia region and is expected to continue, so allowing the exemption to expire in Northern Virginia while extending it elsewhere would not address the energy impacts where much of the future industry growth is likely to occur (sidebar).

Outside of the Northern Virginia planning district, data center projects are currently under development in the counties of Caroline, Chesterfield, Culpeper, Fauquier, Hanover, Henrico, Louisa, Mecklenburg, Pittsylvania, Powhatan, Spotsylvania, and Stafford. Dominion Energy expects the Stafford area to “become another super large market” like Loudoun and Prince William counties.

If the General Assembly allowed the exemption to expire in 2035, it would need to determine how to treat the large subset of data centers that will likely qualify for the special 2040 or 2050 extension. This extension currently pertains only to Amazon Web Services, but other companies may be interested in developing agreements to use the extension. Disallowing Amazon Web Services from using the extension would likely affect its custom performance grant agreement with the state to develop multiple data center facilities throughout Virginia, which was negotiated under the assumption the company would receive the extension, and could be subject to legal challenges.

POLICY OPTION 9

The General Assembly could allow the sales and use tax exemption for data centers to expire in 2035.

Exemption could be changed to balance industry growth with energy impacts

By either extending the exemption or allowing it to expire, the state would be choosing either economic benefits or reduced energy impacts. An alternative approach is to try and balance these competing objectives. The state could do this by allowing the *full* exemption to expire in 2035 (or ending it before then) and applying a *partial* tax exemption to 2050.

The size of a partial exemption could depend on whether the state wants to emphasize economic benefits or reduced energy impacts. For example, under the current exemption, qualifying companies are exempt from paying the full 4.3 percent state share of the retail sales and use tax and local and regional portions (sidebar). Focusing on the state share, a partial exemption could require qualifying companies to pay a 1 percent sales tax, which would keep much of the exemption’s value intact and would likely remain somewhat effective at promoting industry growth (but would do less to reduce energy use). Alternatively, qualifying companies could be required to pay a higher 3 percent sales tax, which would likely be less effective at promoting industry growth and so would reduce future energy use more. By choosing a higher partial tax rate, the state could risk losing some of its existing data centers, particularly in Northern

The statewide retail sales and use tax includes a 4.3 percent state share, a 1 percent local option share, and an additional 0.7 percent to 1.7 percent regional share, depending on the region.

Virginia, although this risk may be diminished by the region’s many attributes that make it so attractive to the industry.

The state would need to determine if the partial exemption would apply to data centers that qualify for the existing special 2040 or 2050 extension. This extension currently pertains only to Amazon Web Services, but other companies may be interested in developing agreements to use the extension. To be most effective at addressing energy impacts, and to maintain a level playing field for competitors, the same or a similar partial exemption could also be applied to these data centers.

POLICY OPTION 10

The General Assembly could amend the Code of Virginia to extend a partial sales and use tax exemption for data centers from 2035 to 2050.

A partial exemption would also better align the economic benefits the state receives with the exemption’s value. Most economic benefits occur during construction, and switching to a partial exemption in 2035 would reduce the value of the exemption in later years when the economic impacts of current and planned data centers could be expected to slow. A partial exemption would also generate more revenue for the state. For example, a 1 percent partial sales tax would have generated approximately \$160 million in state tax revenue in FY23.

Exemption changes could address other policy concerns related to the data center industry

Virginia’s sales tax exemption currently requires...

50 new jobs located at the data center, associated with operations or maintenance.

Jobs pay at least 150% of the prevailing annual average wage of the locality where the data center is located.

\$150 million in capital investment.

Requirements are lower for data centers in economically distressed localities (10 jobs and \$75 million capital investment).

If the decision is made to extend the exemption, this report provides several options the General Assembly could enact to modify it and address concerns in specific policy areas (Table 7-1). These policy options would add new requirements, in addition to the existing requirements, for data centers to be eligible to receive the exemption (sidebar). These options could be phased in gradually to give data center companies enough time to implement them, and the General Assembly could decide to enact some but not others.

The General Assembly will need to determine its primary policy goals for the industry to determine whether to add new requirements to the exemption. If some or all of these policy options were adopted, it would likely make the exemption harder to use and more complex to administer. Alternatively, the General Assembly could pass legislation *requiring* the industry to take these actions, regardless of whether they qualify for the exemption, but this approach could lead to some data centers choosing to either shut down or operate in violation of the law.

The policy options in Table 7-1 would require changes to the Memoranda of Understanding (MOUs) all data center companies are required to enter into with the Virginia Economic Development Partnership (VEDP) to receive the exemption. Current law allows all of a company’s data centers in a specific locality to collectively qualify for

the exemption. Therefore, the company reports data to VEDP for all of its data centers in each locality where it operates rather than by each individual data center. Policy options that apply only to new data centers might require changing MOUs to apply to each individual data center or to have addenda to the MOUs that identify the individual eligible data centers. VEDP would need to determine exactly how MOUs would need to be restructured.

VEDP would also need to determine the evidence data center companies would need to provide to qualify for the exemption, which would likely add to the complexity of administering the exemption. For example, companies could be required to provide appropriate documentation before a new data center becomes operational to qualify for the exemption. Alternatively, companies could be allowed to self-certify under the condition that documentation must be provided if requested by VEDP or Virginia Tax. VEDP would need to develop guidelines for how to implement any new compliance requirements and set forth new terms in the MOUs.

TABLE 7-1
General Assembly could modify the sales tax exemption to address energy, natural resource, historic resource, and residential impacts

Change	Issue Addressed	Policy option
Options that could apply to <i>all</i> Virginia data center operations		
Implement ISO-50001 Energy Management standard or equivalent	Energy impacts and costs	1
Implement ISO-14001 Environmental Management Systems standard or equivalent	Natural resource impacts	5
Options that could apply to <i>new</i> data centers built after a certain date		
No Tier 2 diesel generators in Northern Virginia Ozone Non-Attainment area without SCR systems	Natural resource impacts	4
Phase 1 historic resources study required, viewshed study required if near registered historic site	Historic resource impacts	6
Sound modeling (noise) study required	Residential impacts	8

SOURCE: JLARC staff analysis.

NOTE: ISO = International Organization for Standardization. SCR = Selective Catalytic Reduction systems that reduce emissions of nitrogen oxides, a major contributor to smog-forming ozone, and other harmful emissions.

Appendix A: Study resolution

Resolution of the Joint Legislative Audit and Review Commission directing staff to review data centers

Authorized by the Commission on December 11, 2023

WHEREAS, there has been substantial growth in the data center industry in Virginia, particularly Northern Virginia which has the largest concentration of data centers in the world, Southern Virginia, the Greater Fredericksburg region, and the Greater Richmond region; and

WHEREAS, growth in the data center industry is expected to continue with increasing demand from deployment of advanced and innovative technologies used by individuals, business of all sizes across all industries, government agencies, and other organizations that require the digital infrastructure that data centers provide; and

WHEREAS, data centers can bring economic benefits to localities because they can create significant economic activity during construction, they can increase property tax revenue for local governments without placing high demands on government services like schools, and the clustering of data centers can make a region more attractive to other high tech businesses and help support ecosystems of vendors, service providers, and suppliers; and

WHEREAS, concerns exist over data centers because they require large amounts of energy, which can affect the broader energy market; they may have impacts on natural, historical, and cultural resources; and some citizens have expressed opposition to having data centers located near residential areas due to concerns over issues such as noise and the adverse visual impact: and

WHEREAS, the data center sales tax exemption is Virginia's largest economic development incentive, and JLARC conducted an in-depth review of the exemption in 2019; now, therefore, be it

RESOLVED by the Joint Legislative Audit and Review Commission that staff be directed to review the overall impacts of the data center industry in Virginia and state and local policies regarding the industry. In conducting its study staff shall (i) research recent and expected trends in factors impacting data center industry growth and forecast future growth of Virginia's data center industry, taking into account how various factors may affect these projections; (ii) assess impacts of the data center industry on Virginia's natural resources, as well as historic and cultural resources, and identify potential technologies that could reduce their impacts on these resources; (iii) assess the impacts of the data center industry on current and forecasted energy demand and supply in Virginia, including how data centers will likely affect future energy infrastructure needs, energy rates paid by customer classes and whether cost allocation methods ensure no single customer class is unreasonably subsidized by other customer classes, and the state's ability to transition from fossil fuels to renewable energy sources; (iv) estimate the impact of the data center industry on local revenue and assess how local tax policies may affect data centers; (v) identify how data centers may impact local residents, including concerns such as noise pollution, decreasing property values, and

the adverse visual impact; (vi) identify considerations around the construction and siting of data centers, and review how zoning and regulatory restrictions and requirements can affect data center deployment; (vii) identify guidance and assistance state agencies could provide to local governments for use in making decisions about the location and expansion of data centers; (viii) assess whether more geographically diverse data center industry growth would provide greater economic benefits to the Commonwealth, and if so, identify obstacles to attracting data centers to other areas, particularly economically distressed or rural regions of the state, and policy changes that could increase geographic diversity, such as changes in electricity policy, tax policy, and broadband infrastructure policy; (ix) compare Virginia's competitiveness in attracting data centers with other states; and (x) determine if Virginia's data center tax exemption could be improved, including whether the exemption could be better targeted, the level of benefit is appropriate given the cost, or other changes should be considered.

JLARC may make recommendations as necessary and may review other issues as warranted.

All agencies of the Commonwealth, including the Virginia Department of Energy, the Virginia Department of Environmental Quality, the State Corporation Commission, the Virginia Economic Development Partnership Authority, the Virginia Department of Taxation, and Virginia local governments shall provide assistance, information, and data to JLARC for this study, upon request. JLARC may use consultants as necessary to complete the study. JLARC staff shall have access to all information in the possession of agencies pursuant to § 30-59 and § 30-69 of the Code of Virginia. No provision of the Code of Virginia shall be interpreted as limiting or restricting the access of JLARC staff to information pursuant to its statutory authority.

Appendix B: Research activities and methods

Key research activities performed by JLARC staff for this study included:

- structured interviews with local residents and stakeholder groups, data center companies and developers, state and local officials, electric and water utility companies, and subject-matter experts;
- contracts with consultants to produce an independent energy demand forecast for Virginia and its utilities, and model how future data center growth in Virginia is likely to impact energy supply, demand, emissions, and cost;
- site visits to data centers and nearby communities;
- development of inventories of (i) operational and (ii) planned data centers;
- economic impact analysis of the data center industry (see Appendix D);
- data collection and analysis, including on data center water usage, emissions, capital expenditures, employment and tax benefits amongst users of the data center tax exemption, and data center proximity to residential areas;
- review of state and local laws, ordinances, reports, and policies relevant to energy, natural and historic resources, land use, and noise;
- review of research literature relevant to data centers, energy, natural and historic resources, and noise; and
- review of other documents, literature, and media sources.

Structured interviews

Structured interviews were a key research method for this report. JLARC staff conducted over 250 interviews with 165 different stakeholders.

Residents and stakeholder groups

JLARC staff conducted interviews with nearly 20 local residents and resident stakeholder groups, such as neighborhood associations, including those in Fairfax, Fauquier, Henrico, Loudoun, and Prince William counties. These interviews focused on the impact of data centers on local residents and communities, such as viewshed and noise issues.

JLARC staff also conducted roughly 20 interviews with state and regional stakeholders groups, including those that represent data center companies, electric cooperatives, construction tradespeople, land conservation and preservation, battlefield preservation, sustainability and the environment, and local and tribal interests. Staff interviewed the American Battlefield Trust, Clean Virginia, Cultural Heritage Partners, Data Center Coalition, Friends of the Rappahannock, Northern Virginia Technology Council, Preservation Virginia, Sierra Club, Southern Environmental Law Center, Virginia Association of Counties, Virginia Association of Soil and Water Conservation Districts, Virginia Chapter of the American Planning Association, Virginia Clinicians for Climate Action, Council of Virginia Archaeologists, Virginia Data Center Reform Coalition, Virginia Farm Bureau Federation, and Virginia, and Maryland & Delaware Association of Electric Cooperatives. Staff also interviewed

representatives of the Pamunkey tribe. These interviews covered a range of topics related to the impact of data centers.

Data center companies and developers

JLARC staff conducted nearly 40 interviews with 12 data center companies and developers. These companies operate colocation and hyperscale data centers in Virginia and include industry leaders. These interviews covered a range of topics, including their data center operations in Virginia, the economic impact of data centers, data center site selection, energy issues and sustainability, and the impact of data centers on natural and historic resources, local planning, and community impacts.

State agency staff

JLARC staff conducted more than 30 interviews with state agency staff, including staff from the Virginia Department of Environmental Quality (DEQ), State Corporation Commission, Virginia Economic Development Partnership, Virginia Department of Taxation, Virginia Department of Conservation and Recreation, Virginia Department of Historic Resources, Virginia Department of Forestry, Virginia Department of Agriculture and Consumer Services, Virginia Department of Energy, Virginia Department of Housing and Community Development, and Virginia Department of General Services. These interviews covered a range of topics related to the impact of data centers, including energy issues, issues related to natural and historic resources, and economic development.

Local government staff

JLARC staff conducted more than 50 interviews with local government staff and elected officials in Caroline, Chesterfield, Culpeper, Fairfax, Fauquier, Frederick, Henrico, Loudoun, Mecklenburg, Prince William, Stafford, and Wise counties, and the town of Warrenton. These interviews covered a range of topics, including planning and zoning, economic development, environmental services, public works, historic resources, and local tax and revenue impacts.

Federal government staff

JLARC staff conducted interviews with staff at the U.S. Army Corps of Engineers, U.S. Department of Agriculture, and U.S. Environmental Protection Agency. These interviews generally focused on the impact of data centers on natural resources.

Electric companies and cooperatives in Virginia and Virginia's regional transmission organization

JLARC staff conducted more than 20 interviews with electric companies and cooperatives in Virginia, including Dominion Energy, Appalachian Power Company, and the Central Virginia, Mecklenburg, Old Dominion, Northern Virginia, and Rappahannock electric cooperatives. These interviews focused on the impact of data centers on energy demand, supply, and rates. Interviews with Dominion Energy also focused on energy transmission and generation issues.

JLARC staff also interviewed the PJM regional transmission organization, which serves Virginia. These interviews focused on energy transmission and generation in the region, as well as the impact of data centers on energy demand and supply.

Water utilities

JLARC staff conducted 15 interviews with local water utilities, including those in Caroline, Fairfax, Fauquier, Henrico, Loudoun, Mecklenburg, Prince William, Stafford, and Wise counties. These interviews focused on the impact of data centers on water utilities, planning, and availability.

Subject-matter experts

JLARC staff conducted more than 25 interviews with subject-matter experts across a range of topics related to data centers. These experts included researchers at the Cooling Technologies Research Center at Purdue University, Lawrence Berkeley National Laboratory, National Renewable Energy Laboratory, Occoquan Watershed Monitoring Laboratory, and Rutgers Noise Technical Assistance Center; experts at engineering, law, and real estate firms with experience working with data centers; and leading data center construction materials and equipment manufacturers, such as a steel fabricator and generator manufacturer.

Contracts with consultants

JLARC contracted with faculty from the Weldon Cooper Center for Public Service at the University of Virginia (Weldon Cooper Center) to develop an independent energy demand forecast for Virginia and its utilities. JLARC also contracted with consulting firm Energy + Environmental Economics (E3) to model how data center growth in Virginia is likely to affect future generation and transmission needs and whether the associated costs of system changes could be passed on to residential ratepayers. E3's work was divided into two projects: (1) grid modeling and (2) cost of service and rate impacts.

Additionally, JLARC contracted with Terance Rephann and Joao Ferreira, regional economists at the Weldon Cooper Center, to assist in the economic impact analysis. The methods used for the economic impact analysis are described in Appendix D.

Weldon Cooper Center energy demand forecast

WCC was contracted to develop an independent energy demand forecast for Virginia that accounts for the expected growth of the data center industry. WCC collected data on historical retail energy sales for Dominion Energy, Appalachian Power Company (APCO), and utilities serving the rest of Virginia. WCC collected additional data on retail energy sales to *data center* customers for the utilities that currently serve most of the Virginia data center industry: Dominion, Northern Virginia Electric Cooperative (NOVEC), and Mecklenburg Electric Cooperative (MEC). WCC also collected data on metered load forecasts for data center customers in the Rappahannock Electric Cooperative (REC). REC does not currently have any operational data center customers, but a substantial number of new, large data center campuses are planned to be built in REC's distribution service territory.

Using historical energy sales data, WCC applied advanced statistical methods to develop an *unconstrained energy demand* forecast for Virginia. The unconstrained demand forecast shows what demand would be before accounting for constraints like the ability to build enough energy infrastructure to meet demand. WCC also developed a forecast for *half of unconstrained demand* to provide a lower-growth scenario for analysis purposes. Finally, WCC developed a *no new data center demand* forecast so that the effects of the industry on energy demand could be isolated for analysis purposes. WCC's forecast

made several projections, including baseload demand growth from all non-data center customers, demand growth from data center customers, and demand growth from electric vehicles. Additional details on the data and statistical methods used to develop the forecast are detailed in WCC’s final report to JLARC staff.

WCC’s forecasts cover the period from 2025 to 2050, because VCEA requires carbon emitting generation owned by Dominion and APCO to be retired by 2045 and for the utilities to have all energy from non-carbon emitting sources by 2045 (Dominion) or 2050 (APCO). However, because forecasts become more speculative the farther out they go, this report shows energy demand forecasts up to 2040. The energy demand forecasts for later years are detailed in WCC’s final report to JLARC staff.

One of the limitations of the WCC forecasts is that historical data does not fully capture some of the trends that are likely to drive future data center growth, such as how artificial intelligence (AI) will be developed and deployed. However, the unconstrained demand forecast is within the bounds of what can be expected in the next five-plus years based on the electric service and construction agreements that utilities report having in place with data center customers. It is important to note that because forecasts were developed using actual, historical energy sales, they are not subject to distortion by speculative capacity requests from developers or data center companies.

Energy + Environmental Economics grid modeling (project 1)

E3 developed a model of the regional PJM generation and transmission grid. E3 then converted the WCC *energy* demand forecasts into *peak load* demand forecasts that estimate the highest overall power demand that would be placed on the grid each year, under different scenarios. The peak load forecast considered daily and seasonal energy use trends and weather patterns. E3 then modeled three main demand scenarios. For each of the demand scenarios, the model considered the most feasible and economical approaches to meeting infrastructure needs with and without the requirements of the Virginia Clean Economy Act (VCEA).

- Scenario 1: unconstrained demand, with and without VCEA. E3 also modeled variations where unconstrained demand and VCEA requirements could be met by using high levels of nuclear and renewable generation or by better regional coordination across PJM.
- Scenario 2: half of unconstrained demand, with and without VCEA.
- Scenario 3: no new data center demand, with and without VCEA.

E3’s modeling used industry standard approaches and tools used for electric utility and state energy planning purposes. The model applied constraints on the amounts of infrastructure that could be built by 2030 using historical build rates, relaxed those constraints for 2035, and removed most constraints for 2040 and following years. Modeling was based on state and federal laws and regulations in place in 2024. For VCEA scenarios, the model followed the “letter of the law” and assumed that certain requirements—such as the Renewable Portfolio Standards and associated Renewable Energy Certificate requirements for investor-owned utilities—would not apply to electric cooperatives. This assumption has a significant impact because a majority of future data center growth is expected to occur in the electric cooperatives’ distribution service territories. Societal costs, such as the social cost of carbon, were not explicitly included in the model. Additional details on the exact methods and assumptions used to develop the model are detailed in E3’s final report to JLARC staff.

For each scenario, the model predicted the mix of generation and transmission capacity that would be needed to meet demand, the resulting mix of generation energy sources (including energy imports), and their associated emissions. Outcomes were developed for the Dominion transmission zone, Virginia, and the PJM region. The model also predicted system costs for the Dominion transmission zone, where most data center growth is expected to occur. Each scenario outcome was tested to ensure that the system being built would be functional and meet industry standard reliability requirements.

E3's grid modeling covers the period from 2025 to 2050 because VCEA requires all carbon emitting generation owned by Dominion and APCO to be retired by 2045 and for the utilities to have all energy from non-carbon emitting sources by 2045 (Dominion) or 2050 (APCO). However, because energy demand forecasts and generation options become more speculative in further out years, this report only shows model results up to 2040. The model's results for later years are detailed in E3's final report to JLARC staff.

Energy + Environmental Economics cost of service and rate impact analysis (project 2)

For the cost-of-service analysis, E3 examined how costs were being incurred and allocated to different customer classes under the rate structures in place at Dominion Energy, NOVEC, and MEC. The purpose of this analysis was to determine if the current rate structures were wholly recovering costs from the customers who are incurring those costs. E3's cost-of-service analysis was done using industry standard approaches and tools for electric utility planning purposes. Additional details on the exact methods and assumptions used in this analysis are detailed in E3's final report to JLARC staff.

For the rate impacts analysis, E3 focused on how changing demand could affect generation and transmission costs for residential ratepayers in Dominion's distribution service territory. Dominion was chosen because of its large size and concentration of data centers. Residential rate changes were a key focus because they show how Virginia households could be affected by growing data center demand and are indicative of how other customers, such as businesses, might be affected.

E3's analysis of rate impacts followed three steps. First, E3 estimated total costs that would be attributable to the Dominion transmission zone, under the different energy demand scenarios discussed above, using its grid model. Second, for the Dominion distribution service territory, E3 estimated how costs would be allocated to residential customers, assuming that the company regularly reallocated costs to its different customer classes using current state- and federally approved allocation methodologies. Third, E3 translated these costs into the incremental cost per kilowatt-hour that would be passed on to residential ratepayers.

E3's rate impact analysis was limited to generation and transmission cost increases that could be attributed to growing data center demand. The analysis captures the cost of transmission needed to increase capacity into the Dominion transmission zone (interzonal transmission) and to interconnect with new generation sources. A significant portion of potential future transmission costs, associated with transmission projects *within* the Dominion transmission zone (intrazonal transmission), were not captured because these projects and their costs cannot easily be predicted. The analysis did not consider potential changes to distribution rates because most increases in distribution costs from the data center industry are effectively allocated to and recovered from these customers. E3's analysis also did not consider how Dominion's allowable profit margin would factor into rate impacts.

JLARC staff converted E3's rate impact data to show how a typical residential customer, using 1,000 kilowatt-hours of energy per month, could be affected. JLARC staff's conversion included an adjustment to account for Dominion's allowable profit margin but did not incorporate several other costs that affect the total residential bill. Consequently, Dominion's total residential bill projections, from its integrated resource plan, show much larger overall increases than the numbers presented in this report. Dominion's projections apply to the whole residential bill and include several costs that are not captured in JLARC's analysis, such as distribution costs and the cost of some additional transmission and generation projects that may not be solely attributable to data centers. Dominion's residential bill projections are also in nominal dollars that have been adjusted upward using an inflation assumption whereas JLARC's are held in constant (or real) 2024 dollars to show the real growth of costs that consumers will experience, independent of inflation. The demand forecast that Dominion uses in its rate projections is similar to the WCC unconstrained demand forecast but substantially higher than the half of unconstrained demand forecast.

Site visits

JLARC staff conducted site visits to two operational data centers in Virginia, including one in Loudoun and one in Henrico. Staff conducted these site visits to better understand how data centers are designed and operated. For example, staff observed the data halls, power and cooling systems, and backup generators, and listened to noise levels throughout the facilities. Staff also spoke with a variety of personnel at the data centers, including facility operations managers and operational and maintenance staff.

Additionally, JLARC conducted multiple site visits to observe areas with data center development and neighborhoods with nearby data centers. Two of these site visits were led by stakeholder groups with extensive participation in local zoning processes and studies of data centers. JLARC visited eight neighborhoods close to operational data centers or data centers in various stages of development. At all but one of those locations, JLARC staff spoke with residents about their perspectives on the data centers. Additionally, JLARC visited a commonly used trail adjacent to a data center and visited land within Manassas National Battlefield next to property rezoned for a data center.

Data center inventories

JLARC staff developed an inventory of the operational data centers in Virginia. This inventory was used to map the presence of the industry in Virginia. The inventory was based on data provided by DEQ listing data center sites with active air emissions permits (which all Virginia data centers have for their diesel generators). This data was as of August 2024. Staff used the address field in this data to search county real estate assessment records, using these records to (i) confirm the address was associated with a data center and (ii) identify the size of the site (in terms of acres), the number of buildings on the site, when they were built, and their size (in terms of square feet). In a few instances, county records did not list the size of the building. In these instances, JLARC staff estimated the size of the building(s) on the site based on the total capacity (megawatts) of the generators permitted by DEQ.

Staff cross-referenced this information where possible, using publicly available information from data center company websites, the Existing and Proposed Data Centers map developed by the Piedmont

Environmental Council, and other websites that track the data center industry, such as Datacenter-Hawk. From this cross-referencing, JLARC staff identified a few sites that appeared to be data centers but were not associated with a DEQ permit. In these instances, JLARC staff estimated the capacity of the site (megawatts) based on the size of the building(s) listed on the site's real estate assessment record.

JLARC staff also developed a list of data center sites currently under construction, planned, or proposed in Virginia. This information was used to assess where data center growth is expected to occur in the state. To develop this inventory, staff monitored media articles announcing new and proposed data center development, such as those published by Data Center Dynamics and local news outlets. Staff also identified information about proposed data center sites by reviewing local data center-related zoning and permitting requests.

Data collection and analysis

Local data center tax revenue

JLARC staff calculated the proportion of local revenue that comes from data centers by collecting data center tax revenue from localities and comparing it to their total local revenue reported in the Auditor of Public Accounts' Comparative Report of Local Government Revenues and Expenditures for FY23.

Data center generator permit, emissions, and violations data

DEQ provided JLARC staff air permit data for Virginia data centers (who were identified by DEQ), including data center permitted generator numbers and energy capacities, maximum allowed annual emissions, and actual emissions from 2015–2023. Additionally, JLARC staff used DEQ annual point source emission data, enforcement action data (including notices or violations and any charges assessed), and National Emissions Inventory data for Northern Virginia in 2017 and 2020.

JLARC staff created summary statistics of data center permit information (such as generator numbers and maximum allowed emission) and actual emissions and examined trends across time, regions, and localities. Using a map generated through JLARC's data center inventory, JLARC staff also examined clusters of data centers and cumulative local emissions from data centers.

To understand how data center emissions compare to other industries and contribute to overall emissions, JLARC staff compared data center emission and violation data to that of other Virginia air permit holder groups from 2015–2023. Additionally, JLARC staff estimated the current and potential portion of Northern Virginia air emissions resulting from data centers using 2020 National Emissions Inventory data.

Data center water use

JLARC staff received 2023 data center water usage information from water utilities serving Fairfax, Henrico, Loudoun, Mecklenburg, and Prince William counties as well as the town of Wise. Usage was typically reported for anonymous, individual data center buildings. However, one utility shared combined data for all of their data centers buildings, and one shared all water meter data for data center companies but did not combine use by building. (Some data centers have multiple water lines.) Reclaim

water use amounts were identified in the data. Two utilities shared annual usage data; three shared monthly usage data; and one shared daily usage data. Five utilities were able to share some amount of information related to data center water use trends since 2019 or later. All utilities shared their total annual customer base water usage for 2023.

JLARC staff used this data to calculate individual and cumulative data center water usage amounts, including the portion of a local utility's water that goes to data centers. JLARC also examined data center water usage seasonal trends and trends in recent years. JLARC analyzed data center water usage relative to other industries and water users in Virginia based on DEQ's 2023 Annual Water Resources reports; non-agricultural, non-public utility withdrawal data shared by DEQ; and the U.S. Energy Information Administration's 2012 Commercial Buildings Energy Consumption Survey water use statistics.

Land conversion due to data centers

JLARC estimates of land conversion due to data centers are based on data center development land area summary statistics calculated in JLARC's data center inventory. These land area amounts were compared to statewide and locality natural land losses recorded in the U.S. Department of Agriculture's 2022 Census of Agriculture state-level data and the federal Multi-Resolution Land Characteristics Consortium's National Land Cover Database Enhanced Visualization and Analysis tool.

Proximity of data centers to residential zones

JLARC staff analyzed the distance between operational Virginia data center sites and residential zoning. This analysis was limited to eight localities that account for the vast majority (93 percent) of data center sites in the state. JLARC measured the distance between each operational data center site and the nearest residential zoning using the interactive maps on localities' websites. This measurement indicates the distance between property lines, but the distance between data center buildings and homes is greater because data center buildings tend to be located away from the property line. JLARC staff captured the smallest distance to residential zoning across the multiple parcels that comprise a single data center site. JLARC focused on residential zoning because the zoning classification reflects uses of a property permissible under current local ordinances. However, this approach sometimes *overstates* the distance between a data center site and residences in situations where land is zoned residential but contains no homes. The reverse is also true; this approach sometimes *understates* the distance between data center sites and residences in situations where land contains homes but is not zoned residential. JLARC summarized the proportion of data center sites very close to residential zoning (defined as within 200 feet, which is approximately half the length of a football field) and somewhat close to residential zoning (defined as within 500 feet, which is approximately 1 ½ times the length of a football field) (Table B-1).

JLARC also analyzed the change over time in the proportion of data center sites near residential zoning. For each data center site in the analysis, JLARC identified whether the site existed in 2015 using annual DEQ data about air emission permits, which Virginia data center sites have for their diesel generators. For the group of data center sites with any generators reported to DEQ in 2015, JLARC calculated the proportion within 200 and 500 feet of residential zoning. JLARC then compared those

proportions to the proportions of all data center sites within those specified distances to examine whether data center proximity to residential zoning has increased over time.

TABLE B-1
Proportion of data center sites near residential zoning varies by Virginia locality

Locality	Proportion of data center sites within specified distance of residential zoning		Total data center sites
	200 feet	500 feet	
Loudoun	24%	34%	71
Prince William	21%	21%	24
Fairfax	55%	70%	20
Henrico	38%	38%	8
Chesterfield, Culpeper, Fauquier, Virginia Beach ^a	25%	38%	8
Total	29%	37%	131

SOURCE: JLARC analysis of localities' interactive map websites and JLARC inventory of operational data centers.

NOTE: Six data center sites were excluded from the analysis because data on proximity to residential zoning was not available or reliable.

^a These four localities are combined because the number of data center sites in each locality is very small.

Document and research literature review

JLARC staff reviewed numerous documents and literature pertaining to data centers, such as:

- Virginia state laws, regulations, and policies relevant to energy, natural and historic resources, land use, and noise;
- studies, reports, data, and other information on data center market size and forecasting data center industry growth;
- reports, presentations, and regulatory filings from Dominion Energy, electric cooperatives, and the PJM regional transmission organization, including those related to energy load, load forecasts, and transmission, generation, and distribution projects;
- research literature and stakeholder reports on natural and historic resources; data center backup power and cooling technologies; and data center, other land use, and technology impacts on natural and historic resources;
- federal, state, and local government reports, assessments, webpages, and other documents on natural and historic resources, data center, other land use, and technology impacts on these resources, land use best practices;
- local comprehensive plans, ordinances, and policies relevant to land use and noise;
- local government presentations and reports relating to data centers including documents prepared by staff, consultants, and workgroups;
- summaries of local approaches to data center regulation and recommended practices;
- documents and journal articles describing the science of sound waves, sound modeling processes, ways to reduce sound levels, and government approaches to regulating sound; and
- local, national, and international news media coverage of the data center industry.

Review of local ordinances and specific data center requests

JLARC staff conducted an in-depth examination of the way nine localities in Virginia govern data centers. The review included localities with the most existing data centers in Virginia (Loudoun, Prince William, Fairfax, Henrico, Mecklenburg), as well as several localities that have recently approved their first data centers (Caroline, Fauquier, Stafford, Warrenton). JLARC staff searched for ordinances specific to data centers, as well as other ordinances applicable to data centers due to their location or use category. The review focused on local rules regarding density (e.g., height, lot coverage), architecture (e.g., building materials), site layout (e.g., building setbacks), landscaping, and equipment screening. When specific to data centers, local rules related to environmental, water use or cooling systems, and electricity infrastructure were also identified.

Additionally, JLARC reviewed staff reports for 19 specific data center requests to local elected officials. These reports provided elected officials with information about requests for rezonings, special permits, and exceptions to local ordinances. JLARC staff reviewed reports from Caroline, Fairfax, Henrico, Loudoun, and Prince William counties and the town of Warrenton. The purpose of reviewing these staff reports included learning about the types of potential positive and negative impacts from data centers, the types of conditions beyond minimum requirements that developers committed to, the standards against which local staff evaluated data centers, the frequency of data center development that was not by right, and the alignment between staff recommendations and the decision of elected officials.

Appendix C: Agency responses

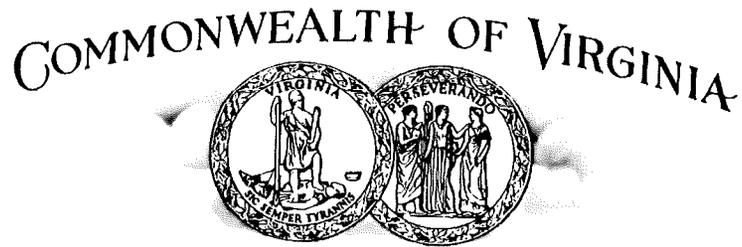
As part of an extensive validation process, the state agencies and other entities that are subject to a JLARC assessment are given the opportunity to comment on an exposure draft of the report. JLARC staff sent relevant portions of the exposure draft to the State Corporation Commission (SCC), Virginia Economic Development Partnership (VEDP), Virginia Department of Environmental Quality, Virginia Department of Historic Resources, Dominion Energy, Northern Virginia Electric Cooperative, and Rappahannock Electric Cooperative.

Appropriate corrections resulting from technical and substantive comments are incorporated in this version of the report. This appendix includes response letters from SCC and VEDP.

JEHMAL T. HUDSON
COMMISSIONER

SAMUEL T. TOWELL
COMMISSIONER

KELSEY A. BAGOT
COMMISSIONER



BERNARD LOGAN
CLERK OF THE COMMISSION
P.O. BOX 1197
RICHMOND, VIRGINIA 23218-1197

STATE CORPORATION COMMISSION

November 22, 2024

Mr. Hal E. Greer, Director
Joint Legislative Audit and Review Commission (JLARC)
919 East Main Street, Suite 2101
Richmond, VA 23219

Dear Mr. Greer:

The State Corporation Commission appreciates the opportunity to review the draft of relevant portions¹ of the JLARC report, *Data Centers in Virginia* provided to Staff on November 13, 2024. The Commission Staff provided its high level feedback to JLARC Staff during a meeting held on Friday, November 22, 2024.

Please let us know if we may be of further assistance.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Jehmal T. Hudson', is written over a horizontal line.

Jehmal T. Hudson
Chairman, State Corporation Commission

¹ Sections 3 and 4, and Appendices F, G, I, and J.

November 21, 2024

Mr. Hal E. Greer, Director
Joint Legislative Audit & Review Commission
919 East Main Street, Suite 2101
Richmond, VA 23219

Re: VEDP response to the draft JLARC report, *Data Centers in Virginia*

Dear Mr. Greer:

Thank you for providing an opportunity for us to review relevant sections of chapters 1, 2 and 7 of the Joint Legislative Audit & Review Commission's (JLARC's) draft report, *Data Centers in Virginia*.

The content we reviewed provides a helpful overview of the data center industry and its importance to the Commonwealth. As the report highlights, data centers are key hubs of the world's digital infrastructure, and their concentration in Virginia has helped establish the Commonwealth as a global tech hub. We particularly appreciate your meticulous survey of the data center industry's presence in Virginia, which accounts for over 63 million square feet of data center space across 150 sites and directly employs more than 8,000 people, in addition to supporting tens of thousands of additional jobs.

Since your last comprehensive review of the industry in 2019, the geographic distribution of data centers across Virginia has changed considerably. Although many of the legacy assets are still concentrated in Northern Virginia, the industry has become an important opportunity for the entire Commonwealth. This expansion, particularly into rural areas, has been facilitated by technologies such as Artificial Intelligence, which are less constrained by latency requirements compared to other applications. Reflecting this trend, seven localities that previously lacked data centers have either approved new campuses or have pending applications, including several rural and "distressed" areas. VEDP's current project pipeline suggests that the spread of data centers across more localities is expected to continue, provided that Virginia continues to offer a competitive sales and use tax exemption.

Your report also demonstrates the significant and far-reaching impact of the data center industry. Notably, the analysis estimates that the data center industry supports an impressive 74,000 jobs, \$5.5 billion in labor income, and \$9.1 billion in Virginia GDP overall to the state economy annually. In particular, we appreciate that your report shines a spotlight on the significant knock-on effects of the industry that extend to virtually every corner of the Commonwealth.

VEDP strongly agrees with the report's finding that the sales and use tax exemption has been an important part of the industry's growth and continues to drive site selection and expansion

Mr. Hal E. Greer
November 21, 2024
Page 2 of 2

decisions. VEDP has responsibility for administering, in cooperation with the Department of Taxation, this important program on behalf of the Commonwealth and is pleased to see that new data collected by VEDP is serving to strengthen transparency. Your analysis adeptly leverages this data to demonstrate the significant state and local tax revenues generated by the industry.

This valuable report comes at a critical juncture for the data center industry. Coming on the heels of significant growth in recent years, the industry is expected to see continued, strong growth driven by demand for digital services and the emergence of new technologies, like Artificial Intelligence. These trends raise important questions about the implications of this growth.

Your report underlines various considerations that legislators will need to balance as they think about the future of the state's support for the data center industry. You correctly point out that sustaining the growth of the industry and its critical contribution to Virginia's economy will require action on the current 2035 sunset of the data center sales and use tax exemption. Allowing the existing exemption to sunset would result in development shifting to competing markets, and those effects are likely already beginning to be felt given the long timeframes the industry uses to analyze their investments.

Nonetheless, VEDP recognizes that balancing competing interests may prompt legislators to seek out a new paradigm for support that navigates a challenging middle ground. The report is helpful in providing a number of different policy options for them to consider. In the context of thinking about these different options, we strongly agree with the report's warning that saddling an incentive program with competing policy priorities is not sound economic development practice. Furthermore, VEDP would caution against any action that could constitute a legal or moral failure to deliver on commitments to companies that have chosen to invest in Virginia and have entered into performance agreements or memoranda of understanding with the Commonwealth. This could expose the Commonwealth to legal risks and seriously undermine our credibility with prospective investors in the future.

As always, we appreciate the professionalism and engagement of JLARC staff during the project and compliment your team on its insightful analysis and reporting.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jason El Koubi', written over a light blue horizontal line.

Jason El Koubi
President & CEO

Appendix D: Economic impact modeling of the data center industry

Weldon Cooper Center staff conducted economic impact analyses of Virginia’s data center industry using IMPLAN (Impact analysis for PLANning) software. IMPLAN has been used in many economic impact studies and is one of the most common tools used in economic impact analysis. Models here were built using 2022 IMPLAN Pro data released in November 2023 that utilizes a 546-sector IMPLAN sector scheme (IMPLAN® model. n.d.). Tables were customized for Virginia and two of its regions using the software.

Input-output analysis using the model produces industry-specific multipliers that indicate how economic activity in one sector of the economy affects the overall state or regional economy. For this study, we were interested in how changes in the data center industry affect the state and regional economy. Outcome variables examined include total employment, state GDP, and labor income.

For estimating the impact of the industry net of the state data center exemption, the opportunity cost of state funds was accounted for by increasing government spending, equivalent to the exemption amount.

Analysis included customization of IMPLAN sector for data centers to better reflect nature of the industry

Tracking the size and growth of the data center industry is challenging because of the absence of a specific industrial classification in government statistics. Data center activity often appears merged with the primary business operations of their parent firms, making their identification difficult¹.

The North American Industrial Classification System (NAICS) code 518210—Data Processing, Hosting, and Related Services—is typically used as a proxy for data centers, but this approach introduces what is usually referred to as “aggregation bias,” as this category encompasses various unrelated activities that have a far higher representation in the sector than only data centers. For instance, an analysis of Virginia’s 2016 employment data for that sector (518210) reveals that only 15 percent of the total employment in the sector was data center employment, with other data centers, cloud computing, and cybersecurity-related support services making up perhaps 2–5 percent more. Indeed, most employment in this sector involves other IT services, such as document scanning and software development, particularly in federal IT contracting in Northern Virginia. (See *Data Centers and Manufacturing Incentives*, JLARC 2019).

Data center employment is also dispersed across other industries. An examination showed that only 41 percent of data center jobs were classified under data processing, hosting, and related services. Significant portions were found in sectors like “wired telecommunications carriers” (30 percent), “telecommunications resellers” (10 percent), and “all other telecommunications carriers” (4 percent). This analysis excluded many enterprise data centers and colocated firms, whose employment is often reported under other business functions, further complicating efforts to track the industry accurately.

The IMPLAN sector for data centers that corresponds to the 518210 NAICS code for data centers is “436 - Data processing, hosting, and related services.” However, using this sector introduces significant bias, as data centers represent only a small portion of its total activity. More importantly, the

expenditure patterns of this IMPLAN sector do not reflect the specific characteristics of data center operations. Because of this, there is a substantial mismatch between the commodity demand and value-added characteristics of the IMPLAN sector 436 and what we know of data center expenditure patterns. For instance, in 2020, IMPLAN data showed that less than 1 percent of gross output is spent on “electricity transmission and distribution” (0.68 percent) and water, sewage, and other systems (0.02 percent) even though data center industry reports estimate that electricity alone accounts for 40 percent of data center operating expendituresⁱⁱ. Data center representatives also estimated energy accounts for about 40 percent of their operating costs during structured interviews. Similarly, employee compensation is overestimated in the IMPLAN model, accounting for 24 percent of output compared with 15 percent in industry-specific studies. This may lead to an inflation of induced economic impacts by overstating the income distributed to households.

In income distribution, little is known about other aspects of data center value added that are important for estimating activity impact, such as profit generation, distribution, and taxes paid. Indeed, data centers have the potential to contribute to local economies through tax payments, which are then reinvested via local government spending. However, IMPLAN’s tax estimation methodology is quite generic and may not accurately reflect county- and state-level tax structures and exemptions. Therefore, modeling alternative tax scenarios with more realistic assumptions can help better estimate the local economic impacts of data centers.

The reliance on conventional and standardized IMPLAN sectors, particularly when key inputs are significantly misrepresented, leads to biased results in economic impact studies. Best practices in economic analysis suggest customizing expenditure patterns to more accurately reflect the unique characteristics of data center operations. Therefore, the expenditure patterns for IMPLAN sector 436 regarding electricity were increased to 40 percent and employee compensation was reduced to 15 percent. Sensitivity analysis was performed to see how changing these percentages affected results. For operational impacts, for example, customizing the IMPLAN sector to include 40 percent of electricity consumption lowers the employment multiplier for data center operations approximately 20 percent.

Analysis includes two modeling phases

This analysis was split into two phases, the construction phase (capital spending for initial development of the data center) and the operations phase (ongoing) to help policymakers better understand the industry’s short-term and long-term impacts. The construction phase corresponds to the initial years of data center development and what must be put in place before a data center “works.” The operations phase accounts for the impact of all the expenditures after the data center opens independent of whether they are considered capital or operational expenditures in their budget.

Construction phase

Information collected by VEDP from data centers using the exemption was used to determine amounts of capital spending by data centers to include in the analysis (Table D-1). The percentages of spending by capital spending category are consistent with other researchⁱⁱⁱ.

TABLE D-1
Initial capital spending of data centers using the exemption (by year)

Year	Land acquisition	Building and site improvements	Exempt equipment or software	Other
2021	\$865 M	\$3,927 M	\$14,333 M	\$940 M
2022	1,030	2,264	9,614	1,615
2023	1,689	5,309	16,009	1,002
Total	\$3,585 M	\$11,501 M	\$39,957 M	\$3,557 M
%	6.1%	19.6%	68.2%	6.1%

SOURCE: VEDP.

The VEDP data includes only data centers that benefited from the tax exemption. These data centers correspond to 92 percent of the data center activity in Virginia, according to DEQ records and JLARC staff analysis of locality real estate records to obtain data center square footage. Statewide, 8 percent of data centers were not included in those numbers. By region, it is estimated that only 5.45 percent of the data centers in Northern Virginia are nonexempt (94.55 percent are exempt) and 21 percent in other regions of Virginia are nonexempt. Capital spending was increased to account for the nonexempt data centers, and this new amount was assumed to be the direct impact of the industry (Table D-2).

TABLE D-2
Initial capital spending of data centers using the exemption (by region)

Year	Land acquisition	Building and site improvements	Exempt equipment or software	Other
Northern Virginia	\$3,316 M	\$10,638 M	\$36,955 M	\$3,290 M
Other regions	632	2,027	7,041	627
Virginia total	\$3,948 M	\$12,664 M	\$43,997 M	\$3,917 M

SOURCE: Weldon Cooper Center.

However, not all of this spending affects Virginia's economy, and a critical assumption of economic impact analysis is the share of capital expenditures that are generated locally. Land acquisition is not traditionally included in impact models since this represents a monetary flow or transfer of funds that will not necessarily translate into a shock in local production. The acquisition of computer and related IT equipment is not necessarily done locally, so it should be assumed that part of this equipment comes from outside the region. This is even more true as we examine smaller geographical areas that might not include the entities associated with wholesale, transportation, and production of this type of equipment. Only building and site improvements (construction) should be included as local production. To estimate the indirect impacts, the model included 100 percent of the building and site improvements as construction (specifically IMPLAN industry sector "51 – construction of new manufacturing structures") and 25 percent of the exempt equipment and software expenditures.

The assumptions described above were used to generate indirect and induced impacts of data center capital investment in Virginia, according to average annual capital investment between FY21 and FY23

(Table D-3). Impact estimates were also produced for Northern Virginia and other regions of the state. Analysis of the results indicates that most of the impacts are construction-related (for example 80 percent of the direct employment is construction-related) rather than from manufacturing and installation of IT equipment.

TABLE D-3
Impacts of initial capital investment in Virginia and by region, annual average FY21–FY23

Impact	Employment	Labor income	Virginia GDP	Total output
Statewide				
Direct	35,110	\$2,646.6 M	\$3,342.1 M	\$7,887.7 M
Indirect	9,945	843.8	1,504.2	2,806.8
Induced	13,992	791.9	1,570.9	2,596.8
Total	59,047	\$4,282.4 M	\$6,417.2 M	\$13,291.3 M
Northern Virginia				
Direct	27,703	\$2,368.5 M	\$2,957.6 M	\$6,625.6 M
Indirect	5,577	585.4	1,30.1	1,733.3
Induced	7,510	490.3	963.7	1,488.2
Total	40,790	\$3,444.2 M	\$4,951.4 M	\$9,847.0 M
Other regions of the state				
Direct	5,761	\$406.5 M	\$517.0 M	\$1,262.5 M
Indirect	1,584	116.6	212.5	418.0
Induced	2,106	107.3	219.6	373.4
Total	9,451	\$630.4 M	\$949.2 M	\$2,053.9 M

SOURCE: Weldon Cooper Center economic impact analysis using IMPLAN.

The statewide results do not match the sum of the results for Northern Virginia and other regions of Virginia because, for the sake of simplicity, a multi-regional input-output model was not used. Data center investment in other regions of the state affects Northern Virginia, and vice versa, but they are not accounted for because the model accounts for the impacts in one region only.

Operation phase

As explained above, to accurately describe the impacts of the ongoing operation, the model was customized to include a better perspective of energy and labor costs. For this analysis, the model assumed that 40 percent of operational expenditures are associated with electricity consumption, and that 15 percent of the industry spending was direct labor costs.

Several adjustments were made to VEDP employment information collected from data centers. The employment information VEDP collected from data centers was used to estimate data center direct employment, statewide, in Northern Virginia, and in other Virginia regions. This number was adjusted in several ways. First, the employment number was reduced by half because the VEDP information on employment tends to boost the number of jobs as data centers can account for the jobs associated with contractors or the employees of contractors in addition to data center employees. In input-output

terminology, this is an indirect impact of the industry. Several data center representatives stated that 50 percent of their jobs were associated with third-party hiring and the other 50 percent with direct jobs. Because the jobs reported by VEDP were all full time (or full-time equivalents), a factor was applied to transform these jobs to full-time and part-time employment as required by the model. Like for capital spending, employment was increased to account for the nonexempt data centers. This new amount was assumed to be the direct impact of the industry (Table D-4).

TABLE D-4
Model was adjusted to incorporate data center operating characteristics

Region	Employment	Labor income	Total output
Northern Virginia	3,426	\$357.4 M	\$2,382.7 M
Other regions of Virginia	947	62.0	413.1
Virginia statewide	4,373	\$419.4 M	\$2,795.8 M

SOURCE: Weldon Cooper.

The results obtained for the impacts of ongoing operation for Virginia are far less than the impacts of capital spending (Table D-5). For example, total employment impacts from a year of data center operations are estimated to be 14,817 jobs compared with total employment impacts of 59,047 jobs for a year of initial capital spending.

TABLE D-5
Impacts of data center operations in Virginia and by region, annual average FY21–FY23

Impact	Employment	Labor income	Virginia GDP	Total output
Statewide				
Direct	4,373	\$419.4 M	\$1,051.1 M	\$2,795.8 M
Indirect	6,615	552.2	1,217.8	2,188.1
Induced	3,830	216.8	430.2	711.1
Total	14,817	\$1,188.4 M	\$2,699.0 M	\$5,695.0 M
Northern Virginia				
Direct	3,426	\$357.4 M	\$956.2 M	\$2,382.8 M
Indirect	4,333	441.8	963.9	1,552.5
Induced	1,966	128.4	252.5	389.9
Total	9,725	\$927.6 M	\$2,172.5 M	\$4,325.1 M
Other regions of the state				
Direct	947	\$62.0 M	\$116.5 M	\$413.1 M
Indirect	1,106	78.3	185.6	356.9
Induced	556	28.3	58.0	98.6
Total	2,609	\$168.6 M	\$360.0 M	\$868.5 M

SOURCE: Weldon Cooper Center economic impact analysis using IMPLAN.

Data center industry impact

Mostly because of the impact associated with initial capital expenditures, data centers in Virginia generate 73,864 jobs per year, corresponding to almost \$5,471 million of labor income, \$9,166 million of Virginia GDP, and an increase in output of \$18,986 million (Table D-6).

TABLE D-6
Summary of initial capital spending and operations impact statewide, annual average FY21–FY23

Impact	Employment	Labor income	Virginia GDP	Total output
Direct	39,483	\$3,066 M	\$4,393 M	\$10,684 M
Indirect	16,560	1,396	2,722	4,995
Induced	17,822	1,009	2,001	3,308
Total	73,864	\$5,471 M	\$9,116 M	\$18,986 M

SOURCE: Weldon Cooper Center economic impact analysis using IMPLAN.

Another aspect is that the state government could also opt to spend the exemption money on alternative sources. The alternative scenario was modeled to estimate impacts if the state would use the annual average exemption amount between FY21 and FY23 (\$573 million per year) in alternative expenditures (Table D-7). These impacts were used to determine the impact of the industry accounting for the cost of the exemption. Accounting for this alternative use of the exemption amount (or opportunity cost), reduces additional jobs by about 5,000 (to 69,000 additional jobs on net) and reduces additional income and Virginia GDP by \$0.4 billion and \$0.5 billion, respectively, which are a small fraction of their total impacts (Table D-6).

TABLE D-7
Impacts to the state if the exemption amount was used instead for alternative government expenditures, annual average FY21–FY23

Impact	Employment	Labor income	Virginia GDP	Total output
Direct	3,534	\$277.4 M	\$359.1 M	\$448.0 M
Indirect	403	27.7	48.3	88.5
Induced	1,197	67.8	134.5	222.4
	5,134	\$372.9 M	\$542.0 M	\$758.9 M

SOURCE: Weldon Cooper Center economic impact analysis using IMPLAN.

ⁱ Byrne, David, Carol Corrado, and Daniel E. Sichel. 2018. The rise of cloud computing: Minding your p's, q's and k's. NBER Working Paper 25188.

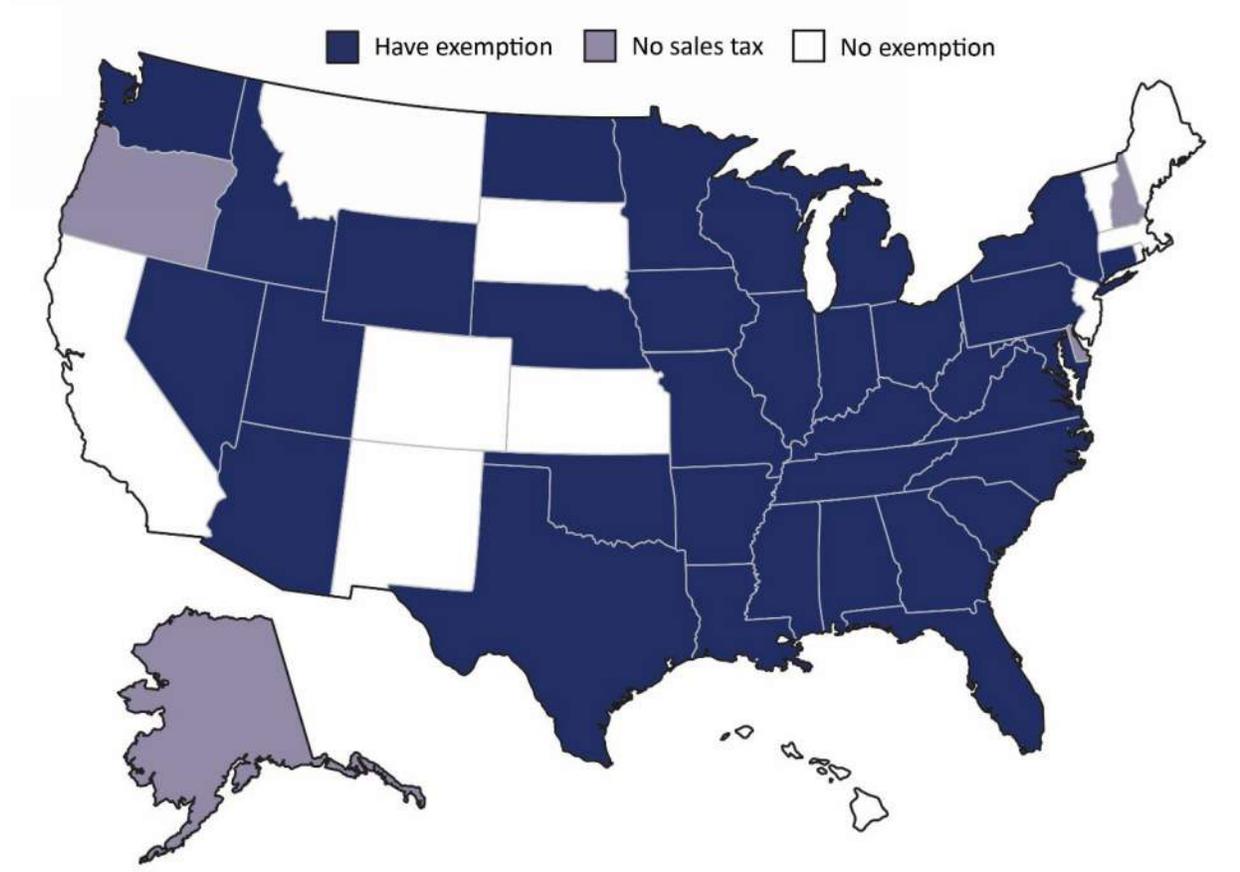
ⁱⁱ Day, Tim and Nam D. Pham. 2017. *Data centers: Jobs and opportunities in communities nationwide*. U.S. Chamber of Commerce Technology Engagement Center.

ⁱⁱⁱ Day, Tim and Nam D. Pham. 2017. *Data centers: Jobs and opportunities in communities nationwide*. U.S. Chamber of Commerce Technology Engagement Center.

Appendix E: States with data center sales tax exemptions

Most states either have a sales tax exemption for data centers (34) or do not have a sales tax (Figure E-1). All states bordering Virginia provide a sales tax exemption to data centers.

FIGURE E-1
Nearly all states offer a sales tax exemption for data centers (2024)



SOURCE: State Tax Notes and JLARC staff review of state websites.

Appendix F: Energy infrastructure project impacts and regulation

Construction of new generation and transmission infrastructure can affect the communities and environments where they are built. The extent of any impacts will vary substantially for generation and transmission projects. State and local governments regulate these projects, through review and approval processes. Regulatory processes seek to minimize negative impacts but do not necessarily avoid them altogether. Utilities can implement several grid enhancing technologies to help reduce the need for major new generation and transmission projects, but this does not eliminate the need for new projects.

Construction of new generation and transmission infrastructure can have environmental impacts and is often opposed by local communities

On the generation side, a significant portion of new generation is expected to be solar, and solar facilities have large land demands that can have widespread impacts. For example, a modest 100 MW solar facility would require about 5,000 to 1,000 acres of land in Virginia. (The rule of thumb is that five to 10 acres of solar can generate up to 1 MW of power.) Because of the large land demands, most solar facilities are built in rural areas. Constructing solar facilities typically involves clearing forest land or converting agricultural land to this use, which can have several environmental impacts from habitat loss to affecting stormwater runoff.

Some communities in rural Virginia have been increasingly opposed to new solar facilities, with several counties placing restrictions on solar development or outright denying projects. Community opponents site environmental concerns, impacts on local agriculture, and the effects of solar facilities' industrial appearance on the rural character of their counties. Opponents also often assert that solar facilities do not offer significant economic or other benefits to their communities.

The extent to which a solar project affects the environment and generates community opposition depends on the project. For example, a project that involves clearing 5,000 acres of forest land with multiple streams would have a more substantial environmental impact than a project that is installed on 2,000 acres of fallow pastureland. Similarly, a development located near a residential area or that is visible from the surrounding area could generate more community opposition than one that is hidden from view.

On the transmission side, new transmission lines can fragment forest habitats, create water quality risks at stream and wetland crossings, and reduce scenic quality of nearby historic and recreational resources. Communities are sometimes opposed to new or expanded transmission lines for these reasons. Communities also sometimes oppose new transmission lines because of their undesirable appearance, effect on the use of private properties that are under or adjacent to the lines, effect on the value of nearby properties, and health concerns.

Similar to the generation side, the potential environmental and community impacts of a transmission project can vary greatly from one project to the next. Generally, a "green field" project that involves acquisition of new right-of-way and construction of transmission lines where none currently exist is going to have the highest impact. A project where new lines are built in or adjacent to an existing

transmission line will be less impactful, and a project where an existing line is “wrecked and rebuilt” would be the least impactful.

State and local regulation is intended to minimize the impacts of new generation and transmission projects on communities and the environment

Construction of major new generation and transmission facilities is regulated by the state to minimize impacts. Many of these projects are approved by the SCC through a formal case process to determine if a Certificate of Public Convenience and Necessity (CPCN) should be granted. The SCC considers several factors before approving a project and granting a CPCN. These factors include the potential impacts of the project on property owners, the environment, and cultural and historic resources (Table F-1). While these impacts may not be completely avoided, the process encourages the selection of projects and options that best minimize impacts without placing large cost burdens on ratepayers.

Smaller renewable generation projects (<150 MW) can be reviewed and approved by the Department of Environmental Quality through a separate “Permit by Rule” process. While this is not a litigated case process like an SCC approval, projects are reviewed to ensure they conform with the state’s requirements.

Localities have some authority over generation projects and transmission and distribution substations but minimal authority over transmission lines. Generation facilities and substations are subject to the same types of local zoning processes as other land uses. Local zoning ordinances specify which zoning districts allow them, whether they require a special permit from elected officials, and whether any design standards (such as landscaping) apply. Additionally, state law requires local reviews of certain entities—including substations—before development to evaluate their alignment with the local comprehensive plan. For transmission lines, CPCN approval deems the transmission line to be in compliance with local comprehensive plans and ordinances. In effect, this means localities do not have any direct authority over most transmission line project approvals or routes. (Although localities can play a role in approving 138 kilovolt transmission lines, which exist in a few parts of the state.)

Solar and similar projects are required to attempt to coordinate an agreement with their host locality. State law requires applicants for solar or energy storage projects to notify localities of their intent to develop and to meet with the locality to negotiate a “siting agreement.” This siting agreement can include conditions such as mitigating negative impacts, and if created, must receive a public hearing. However, there is no requirement for this process to culminate in a siting agreement. Failure to achieve a siting agreement does not prevent a developer from initiating the usual local zoning processes for new developments.

Localities do not have approval authority over transmission line projects but can participate in SCC cases either as respondents or public witnesses. As a public witness, a locality can submit written comments, or local representatives can provide comments in person at commission hearings. As a respondent, a locality becomes a participant in the case and can take several additional actions, such as filing for discovery (e.g., to obtain copies of utility analysis or documents supporting the application for a project), filing briefs, providing expert witnesses, and participating in cross examination of

witnesses (e.g., utility staff). No matter which approach is followed, the SCC is required to hear and weigh all evidence equally.

TABLE F-1
Criteria that the SCC must evaluate before approving a project and granting a CPCN

Criteria that must be met

- Is not against the public interest ^a
- Will have no material adverse effect on system reliability
- Will have no material adverse effect on rates
- For transmission projects,
 - a. the line is needed, ^b
 - b. proposed method of installation is justified, ^b
 - c. will avoid or minimize adverse impact on (a) scenic assets, (b) historic and cultural resources, (c) the environment, and (d) human health and safety, and
 - d. why existing rights-of-way cannot adequately serve the need (presumably only applies when an expanded or new right-of-way acquisition is being requested as part of the project)

Criteria that must be considered

- Environmental impacts
- Human health and safety impacts
- Historical and cultural resource impacts
- Economic impacts, including job creation
- Improvement to service reliability
- Environmental justice considerations

Criteria that are considered, if requested

- Conformance with local comprehensive plans (locality must request) ^c
 - Costs, economic benefits, and effect on construction timeline of undergrounding transmission lines (locality must request)
-

SOURCE: The Code of Virginia § 2.2-235, § 56-265.2, § 56-580, and § 56-46.1.

NOTE: SCC regulations provide additional information on what must be submitted to meet requirements and details what must be provided for transmission projects. SCC guidance also includes a planning and design attachment that provides detailed guidelines to applicants on how to ensure facilities protect natural and historic resources. SCC guidance provides additional information on when a transmission project requires a CPCN, based on specific characteristics. SCC guidance notes that certain transmission projects, such as reconductoring, do not require a CPCN.

^a This is a general criterion that can be interpreted as the cumulation of all the other criteria weighed against each other. The Code declares some projects meet this goal—such as small renewable generation projects and projects in VCEA—and so do not require SCC to make a determination.

^b Based on applicant's load flow modeling, contingency analysis, and presented reliability needs.

^c Localities are explicitly granted right to present evidence that shows existing corridors, as designated in the comprehensive plan, can serve the identified need.

Localities also have three additional authorities under Code. First, localities can request that the SCC consider the costs, economic benefits, and effects on construction timelines of undergrounding transmission lines. Second, localities can establish transmission corridors in their comprehensive plans and provide evidence that new lines should be within those corridors, but it appears this latter

authority has been rarely (if ever) used. Third, localities can establish special tax districts that pay for the additional costs of undergrounding transmission lines, although it appears this authority has never been used.

Some stakeholders have said that local governments should have more authority to determine transmission routes and, especially, when transmission lines should be buried underground. While this would make transmission projects more responsive to local needs, undergrounding transmission lines is substantially more expensive and those added costs are currently spread across all utility ratepayers. Any changes to give localities more authority to require undergrounding of transmission lines would need to be accompanied by a change in how costs are allocated to prevent local government decisions from affecting rates paid by customers who do not benefit from undergrounding projects.

Utilities can use grid enhancing technologies to help reduce the need for new generation and transmission infrastructure

Utilities use grid enhancing technologies (GETs), such as reconductoring existing transmission lines, to increase capacity of the transmission system and more effectively use existing generation. For example, Dominion reports that it uses advanced conductors for all its 230 kV reconductor and new build projects, which can increase line capacity by 50 percent. Dominion reported adding or replacing 800 miles of line with advanced conductors as of the end of 2023. Dominion also reports deploying and piloting several other GETs to improve system stability and efficiency. Utilities have an economic incentive to deploy GETs so that they can provide enough transmission capacity to serve fast-growing demand.

SCC staff indicated that, before approving a new transmission line project, they consider whether a quicker and lower-cost approach, such as reconductoring, could be used instead. Staff make this determination by looking at the project proposal, the state need, and whether reconductoring will address the need. SCC staff carry out their own power flow studies and verify thermal issues, voltage issues, and generator deliverability (if applicable).

Appendix G: Virginia Clean Economy Act

The Virginia Clean Economy Act (VCEA) was enacted in 2020 and was intended to drive investment in renewable resources and phase out carbon-emitting generation in the state by 2050. VCEA was passed when energy demand in Virginia was projected to remain relatively flat. Now that demand is growing, largely because of data centers, it will be more challenging to meet these goals than originally contemplated.

The main way VCEA intends to decarbonize generation is by requiring an increasing share of energy sold by Dominion and APCO to come from renewable sources. The share of generation from renewables—the Renewable Portfolio Standard (RPS) requirement—increases each year until it reaches 100 percent (Table G-1). The utilities can meet the RPS requirement by directly building and claiming credit for new renewable generation facilities (mainly solar and wind) and entering into power purchasing agreements with third parties that operate renewable facilities. Utilities receive Renewable Energy Certificates (RECs) for energy from these sources, which are then credited toward their RPS requirement. Utilities can also purchase RECs from the PJM market and use purchased RECs to offset energy produced through carbon generation. Starting in 2025, 75 percent of Dominion’s RECs must be from in-state generation sources. VCEA financially penalizes utilities that do not comply with in-state renewables requirements by levying deficiency payments, but in practice utilities may choose to pay those deficiency payments if it is more economical or feasible than securing new renewable generation. The cost of deficiency payments is recovered from utility customers. VCEA sets aside nuclear power as a third category of generation, which in effect can be used to reduce the total amount of renewable energy required.

TABLE G-1

VCEA requires growing share of energy sold in Virginia to come from renewable generation sources, with full decarbonization by 2050

	Percentage of total power sold required to come from renewables (excluding nuclear)	
	Dominion	APCO
2021 (year one)	14%	6%
2025	26	14
2030	41	30
2035	59	45
2040	79	65
2045	100	80
2050	-	100%

SOURCE: The Code of Virginia § 56-585.5.

NOTE: Percentages are the RPS program requirements for selected years; statute sets a percentage for every year. Nuclear power is excluded from the RPS calculation. For example, if one-third of Dominion power is nuclear, then the RPS percentage applies only to the remaining two-thirds of power that is not nuclear. Renewable energy is credited toward meeting RPS requirements through the purchase and retirement of Renewable Energy Certificates (RECs). RECs can be used to offset carbon emissions.

The VCEA's RPS requirements, and their associated REC requirements, do not apply to electric co-operatives (co-ops). This has significant implications because a majority of future energy demand growth is expected to occur in the co-ops' service territories, where many new data center campuses are expected to be built. (This is based on JLARC's consultant forecasts, and is corroborated with utility forecasts, utility construction and service agreements, and JLARC staff's review of data center projects that are actively under development). Unlike Dominion and APCO, state law allows co-ops to secure energy to meet their growing demand from non-renewable and out-of-state generation sources.

VCEA directs the Virginia Air Pollution Control Board to develop regulations to gradually reduce carbon emissions. VCEA states the board "may establish, implement, and manage an auction program" or "utilize an existing multistate trading system" to achieve this purpose. Initially the state entered into the Regional Greenhouse Gas Initiative (RGGI) to reduce carbon emissions. The state has since withdrawn from RGGI, although the legality of that withdrawal is being challenged in court. A recent state circuit court decision ruled that the regulatory actions the state took to remove Virginia from RGGI were unlawful, but this decision could be appealed to a higher court.

Finally, VCEA requires carbon-emitting generation in Virginia owned by Dominion and APCO to be retired by 2045. However, VCEA allows these utilities to continue operating carbon-emitting generation plants in Virginia past 2045 if taking the plant off-line "would threaten the reliability or security of electric service to customers." Utility decisions to keep plants operating past 2045 must be approved by SCC.

VCEA also has a presumption against the SCC approving new carbon-emitting generation plants, which applies to investor-owned utilities and co-ops. However, new carbon-emitting plants can be built if SCC determines they are needed to address threats to the reliability or security of electric service to the utility's customers.

Appendix H: Grid modeling generation capacity and energy source results

JLARC staff commissioned Energy + Environmental Economics (E3) to develop an independent grid model and project the future generation and transmission infrastructure that would be needed to meet three different demand scenarios. For each of the demand scenarios, the model considered the most feasible and economical approaches to meeting infrastructure needs with and without the requirements of the Virginia Clean Economy Act (VCEA).

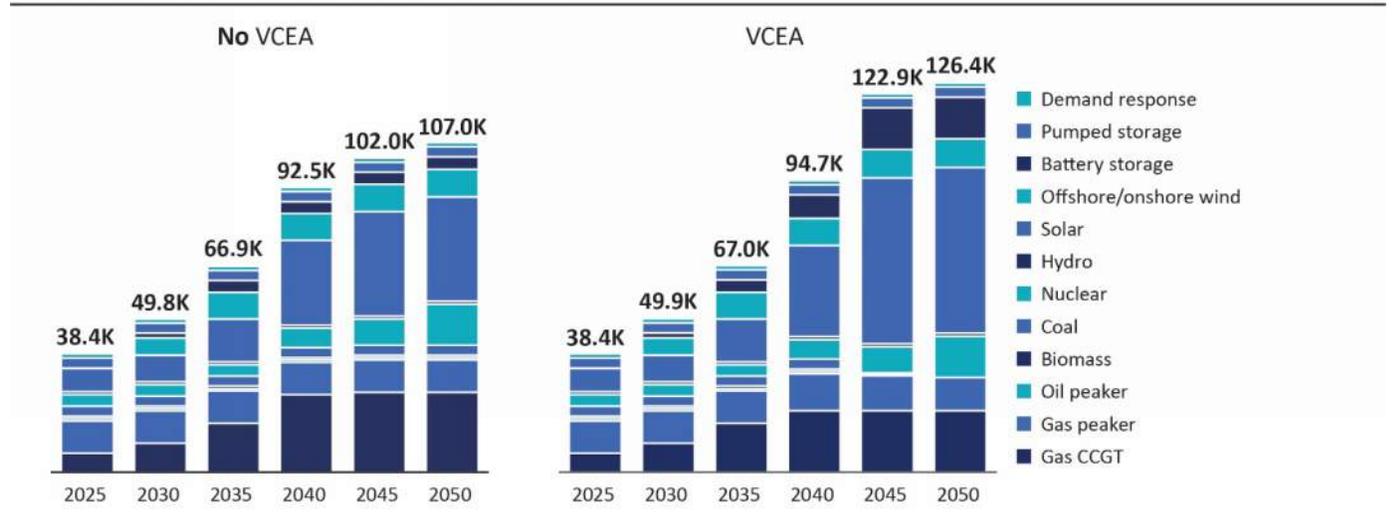
- Scenario 1: unconstrained demand, with and without VCEA. E3 also modeled variations where unconstrained demand and VCEA requirements could be met by using high levels of nuclear and renewable generation or by better regional coordination across PJM (not shown in this report).
- Scenario 2: half of unconstrained demand, with and without VCEA.
- Scenario 3: no new data center demand, with and without VCEA.

This appendix provides E3's grid modeling Virginia-level results for the (a) in-state generation capacity that would be needed to meet each demand scenario, by type of generation source and (b) the amount of energy that would be used from each type of generation source. Generation capacity is given in megawatts (MW) of nameplate capacity that would be needed, which can be significantly higher than the firm amount of capacity available from a resource. For example, Virginia solar facilities produce around 25 percent of nameplate capacity. Generation energy is given in annual tera-watt hours (TWh) of energy used. E3's grid model assumes natural gas plants would be converted to hydrogen fuel in each scenario when VCEA compliance is assumed, starting in 2045. The model assumes that new nuclear generation will not be available until 2035. For additional discussion of E3's grid modeling methodology, see Appendix B.

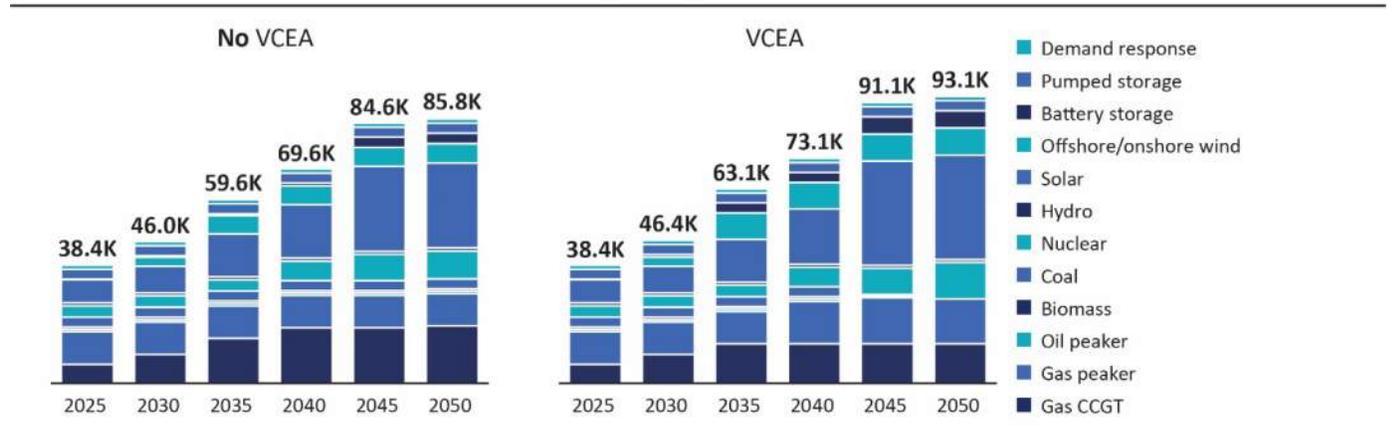
Results begin on next page.

FIGURE H-1
Generation capacity required 2025 to 2050

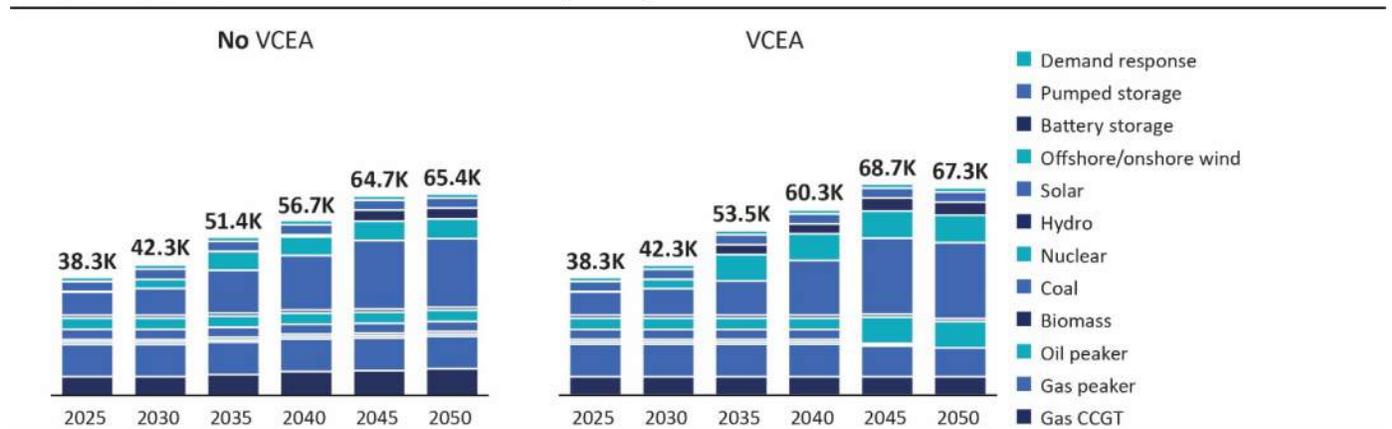
SCENARIO 1: UNCONSTRAINED DEMAND (IN MW)



SCENARIO 2: HALF OF UNCONSTRAINED DEMAND (IN MW)



SCENARIO 3: NO NEW DATA CENTER DEMAND (IN MW)



SOURCE: E3 grid modeling analysis.
 NOTE: Capacity shown is nameplate capacity.

TABLE H-1
Generation capacity required 2025 to 2050, Scenario 1: Unconstrained demand (MW)

No VCEA

Resource	2025	2030	2035	2040	2045	2050
Gas CCGT	6,141	9,391	15,891	25,149	25,937	25,937
Gas peaker	10,499	10,499	10,499	10,499	10,499	10,499
Oil peaker	813	813	813	813	813	813
Biomass	765	765	765	765	765	765
Coal	3,230	3,230	3,230	3,230	3,230	3,230
Nuclear	3,708	3,708	3,708	6,388	8,532	13,356
Hydro	929	929	929	929	929	929
Solar	7,596	8,673	13,939	27,503	33,880	33,880
Offshore/onshore wind	-	5,580	8,656	8,756	8,856	8,956
Battery storage	116	1,608	3,835	3,835	4,008	4,008
Pumped storage	3,241	3,241	3,241	3,241	3,241	3,241
Demand response	1,354	1,354	1,354	1,354	1,354	1,354
Total	38,393	49,792	66,861	92,462	102,043	106,967

VCEA

Resource	2025	2030	2035	2040	2045	2050
Gas CCGT	6,141	9,391	15,891	19,945	19,945	19,945
Gas peaker	10,499	10,499	10,499	11,976	11,342	10,863
Oil peaker	813	813	813	813	316	-
Biomass	765	765	765	765	15	-
Coal	3,230	3,230	3,230	3,230	630	-
Nuclear	3,708	3,708	3,708	6,388	8,532	13,356
Hydro	929	929	929	929	929	929
Solar	7,596	8,673	13,939	29,622	53,880	53,880
Offshore/onshore wind	-	5,580	8,656	8,756	9,216	9,316
Battery storage	116	1,667	4,014	7,645	13,511	13,511
Pumped storage	3,241	3,241	3,241	3,241	3,241	3,241
Demand response	1,354	1,354	1,354	1,354	1,354	1,354
Total	38,393	49,851	67,040	94,665	122,911	126,394

SOURCE: E3 grid modeling analysis.

NOTE: Capacity shown is nameplate capacity.

TABLE H-2

Generation capacity required 2025 to 2050, Scenario 2: Half of unconstrained demand (MW)

No VCEA

Resource	2025	2030	2035	2040	2045	2050
Gas CCGT	6,141	9,391	14,626	18,021	18,021	18,605
Gas peaker	10,499	10,499	10,499	10,499	10,499	10,499
Oil peaker	813	813	813	813	813	813
Biomass	765	765	765	765	765	765
Coal	3,230	3,230	3,230	3,230	3,230	3,230
Nuclear	3,708	3,708	3,708	6,388	8,532	9,119
Hydro	929	929	929	929	929	929
Solar	7,596	8,673	13,939	17,340	27,589	27,589
Offshore/onshore wind	-	2,940	6,016	6,116	6,216	6,316
Battery storage	116	494	494	892	3,375	3,375
Pumped storage	3,241	3,241	3,241	3,241	3,241	3,241
Demand response	1,354	1,354	1,354	1,354	1,354	1,354
Total	38,393	46,038	59,615	69,589	84,565	85,835

VCEA

Resource	2025	2030	2035	2040	2045	2050
Gas CCGT	6,141	9,391	12,856	12,856	12,856	12,856
Gas Peaker	10,499	10,499	10,499	13,709	15,013	14,534
Oil Peaker	813	813	813	813	316	-
Biomass	765	765	765	765	15	-
Coal	3,230	3,230	3,230	3,230	630	-
Nuclear	3,708	3,708	3,708	6,388	8,532	11,854
Hydro	929	929	929	929	929	929
Solar	7,596	8,673	13,939	17,883	33,880	33,880
Offshore/onshore Wind	-	2,940	8,576	8,676	8,776	8,876
Battery Storage	116	878	3,216	3,231	5,590	5,590
Pumped Storage	3,241	3,241	3,241	3,241	3,241	3,241
Demand Response	1,354	1,354	1,354	1,354	1,354	1,354
Total	38,393	46,422	63,126	73,075	91,132	93,114

SOURCE: E3 grid modeling analysis.

NOTE: Capacity shown is nameplate capacity.

TABLE H-3
Generation capacity required 2025 to 2050, Scenario 3: No new data center demand (MW)

No VCEA

Resource	2025	2030	2035	2040	2045	2050
Gas CCGT	6,042	6,042	6,759	7,728	8,016	8,642
Gas peaker	10,499	10,499	10,499	10,499	10,499	10,499
Oil peaker	813	813	813	813	813	813
Biomass	765	765	765	765	765	765
Coal	3,230	3,230	3,230	3,230	3,230	3,230
Nuclear	3,708	3,708	3,708	3,708	3,708	3,708
Hydro	929	929	929	929	929	929
Solar	7,596	8,673	13,939	17,733	22,340	22,340
Offshore/onshore wind	-	2,940	6,016	6,116	6,216	6,316
Battery storage	116	116	116	609	3,583	3,583
Pumped storage	3,241	3,241	3,241	3,241	3,241	3,241
Demand response	1,354	1,354	1,354	1,354	1,354	1,354
Total	38,293	42,310	51,369	56,725	64,695	65,421

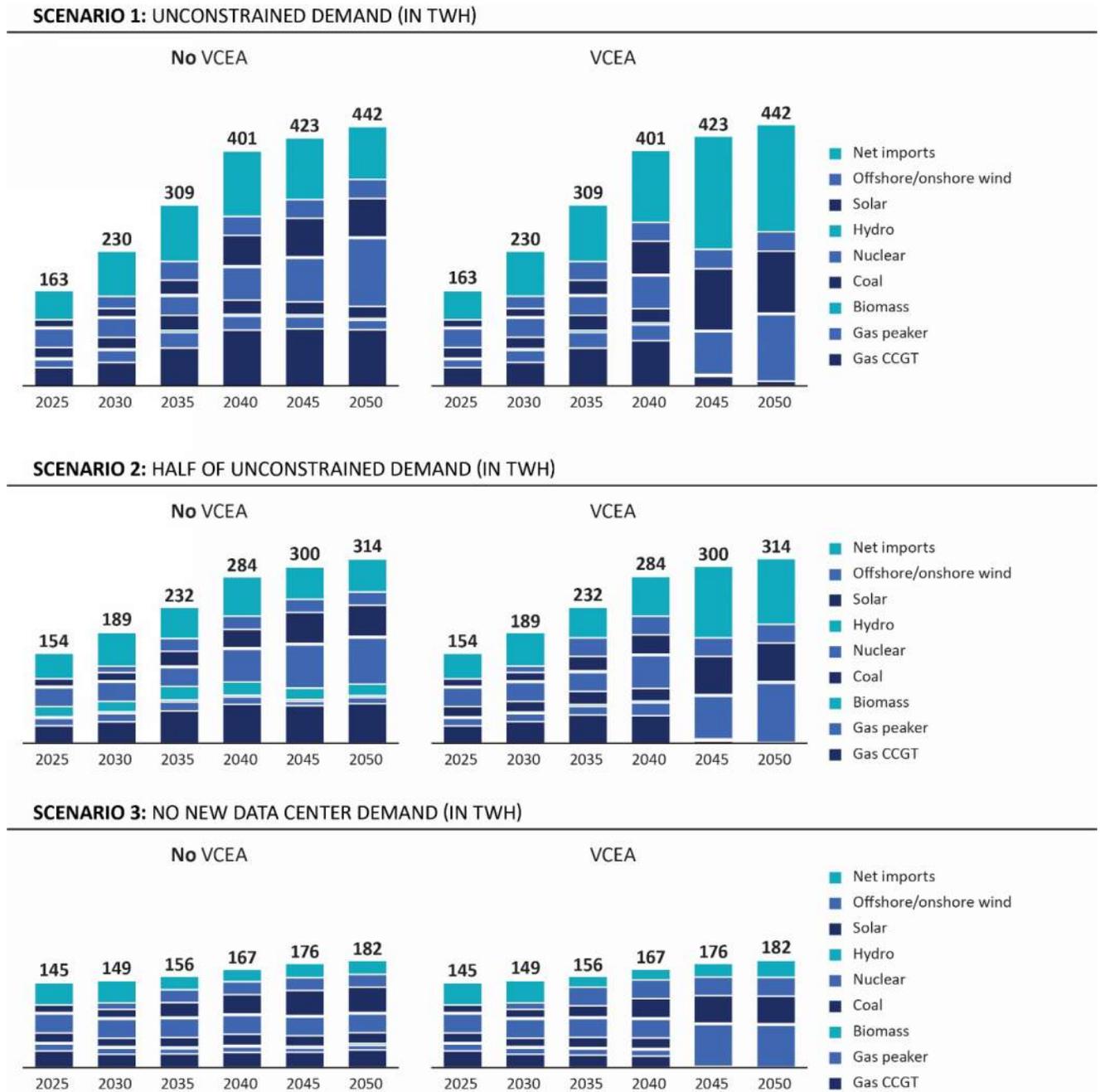
VCEA

Resource	2025	2030	2035	2040	2045	2050
Gas CCGT	6,042	6,042	6,042	6,042	6,042	6,042
Gas peaker	10,499	10,499	10,499	10,499	9,865	9,386
Oil peaker	813	813	813	813	316	-
Biomass	765	765	765	765	15	-
Coal	3,230	3,230	3,230	3,230	630	-
Nuclear	3,708	3,708	3,708	3,708	8,532	8,532
Hydro	929	929	929	929	929	929
Solar	7,596	8,673	11,092	17,783	24,669	24,669
Offshore/onshore wind	-	2,940	8,576	8,676	8,776	8,876
Battery storage	116	116	3,216	3,216	4,313	4,313
Pumped storage	3,241	3,241	3,241	3,241	3,241	3,241
Demand response	1,354	1,354	1,354	1,354	1,354	1,354
Total	38,293	42,310	53,465	60,256	68,682	67,341

SOURCE: E3 grid modeling analysis.

NOTE: Capacity shown is nameplate capacity.

FIGURE H-2
Energy sources 2025 to 2050



SOURCE: E3 grid modeling analysis.

TABLE H-4
Energy sources 2025 to 2050, Scenario 1: Unconstrained demand (TWh)

No VCEA

Resource	2025	2030	2035	2040	2045	2050
Gas CCGT	31	40	65	96	98	96
Gas peaker	14	20	27	23	21	16
Oil peaker	-	-	-	-	-	-
Biomass	3	3	3	3	3	3
Coal	18	19	26	24	22	21
Nuclear	32	32	32	56	74	116
Hydro	3	3	3	3	3	3
Solar	13	14	25	52	66	66
Offshore/onshore wind	-	21	32	32	32	33
Battery storage	(0)	(0)	(0)	(0)	(1)	(1)
Pumped storage	(0)	(0)	(0)	(0)	(0)	(0)
DR	0	0	0	0	0	0
Net Imports	50	77	97	112	105	90
Total	163	230	309	401	423	442

VCEA

Resource	2025	2030	2035	2040	2045	2050
Gas CCGT	31	40	65	77	16	8
Gas peaker	14	20	27	27	1	-
Oil peaker	-	-	-	-	-	-
Biomass	3	3	3	3	0	-
Coal	18	19	26	24	2	-
Nuclear	32	32	32	56	73	114
Hydro	3	3	3	3	3	3
Solar	13	14	25	57	105	106
Offshore/onshore wind	-	21	32	32	33	33
Battery storage	(0)	(0)	(0)	(1)	(2)	(1)
Pumped storage	(0)	(0)	(0)	(1)	(3)	(3)
DR	0	0	0	0	0	0
Net imports	50	77	97	123	194	183
Total	163	230	309	401	423	442

SOURCE: E3 grid modeling analysis.

TABLE H-5
Energy sources 2025 to 2050, Scenario 2: Half of unconstrained demand (TWh)

No VCEA

Resource	2025	2030	2035	2040	2045	2050
Gas CCGT	30	37	55	66	64	67
Gas peaker	13	14	15	13	7	11
Oil peaker	-	-	-	-	-	-
Biomass	3	3	3	3	3	3
Coal	17	18	23	22	19	20
Nuclear	32	32	32	56	74	79
Hydro	3	3	3	3	3	3
Solar	13	14	25	32	53	53
Offshore/onshore wind	-	11	22	22	23	23
Battery storage	(0)	(0)	(0)	(0)	(1)	(1)
Pumped storage	(0)	(0)	(0)	(0)	(1)	(1)
DR	0	0	0	0	0	0
Net imports	44	57	54	67	56	56
Total	154	189	232	284	300	314

VCEA

Resource	2025	2030	2035	2040	2045	2050
Gas CCGT	30	37	48	47	4	2
Gas peaker	13	14	15	22	1	-
Oil peaker	-	-	-	-	-	-
Biomass	3	3	3	3	0	-
Coal	17	18	23	22	3	-
Nuclear	32	32	32	56	73	101
Hydro	3	3	3	3	3	3
Solar	13	14	25	33	66	66
Offshore/onshore wind	-	11	32	32	32	32
Battery storage	(0)	(0)	(0)	(0)	(1)	(1)
Pumped storage	(0)	(0)	(0)	(0)	(1)	(1)
DR	0	0	0	0	0	0
Net imports	44	58	53	68	123	112
Total	154	189	232	284	300	314

SOURCE: E3 grid modeling analysis.

TABLE H-6
Energy sources 2025 to 2050, Scenario 3: No new data center demand (TWh)

No VCEA

Resource	2025	2030	2035	2040	2045	2050
Gas CCGT	29	23	23	26	26	30
Gas peaker	11	10	9	10	7	8
Oil peaker	-	-	-	-	-	-
Biomass	3	3	3	3	3	3
Coal	16	14	16	19	18	18
Nuclear	32	32	32	32	32	32
Hydro	3	3	3	3	3	3
Solar	13	14	25	33	43	43
Offshore/onshore wind	-	11	22	22	22	22
Battery storage	-	(0)	(0)	(0)	(1)	(1)
Pumped storage	(0)	(0)	(0)	(0)	(1)	(1)
DR	0	0	0	0	0	0
Net imports	38	38	23	21	24	24
Total	145	149	156	167	176	182

VCEA

Resource	2025	2030	2035	2040	2045	2050
Gas CCGT	29	23	21	20	0	0
Gas peaker	11	10	11	10	0	0
Oil peaker	-	-	-	-	-	-
Biomass	3	3	3	3	0	-
Coal	16	14	17	18	2	-
Nuclear	32	32	32	32	71	72
Hydro	3	3	3	3	3	3
Solar	13	14	19	33	47	47
Offshore/onshore wind	-	11	32	32	32	32
Battery storage	-	(0)	(0)	(0)	(1)	(1)
Pumped storage	(0)	(0)	(0)	(0)	(1)	(1)
DR	0	0	0	0	0	0
Net imports	38	38	19	19	23	29
Total	145	149	156	167	176	182

SOURCE: E3 grid modeling analysis.

Appendix I: Data center on-site generation

Instead of relying on utilities, many data center companies are looking at ways to generate their own power using on-site power generation. On-site generation can take a variety of forms, including utility-owned generation on or adjacent to a data center site, “behind the meter” generation that is owned by the data center, or a “microgrid” where the site operates its own generation and may not be connected to the larger grid. Of the current technologies available, only natural gas appears viable for on-site generation, and it can be deployed only close to pipeline infrastructure that has sufficient capacity to serve generation needs. Other technologies, such as small modular nuclear reactors, are being actively pursued by the industry as a potential future power source, but most stakeholders believe these will not realistically be available until 2035.

On-site generation is most likely to be used at new data center sites, where they can be incorporated into the site design. It appears unlikely existing sites, especially those that are fully built out, could be switched to on-site generation because of space constraints and financial considerations. Additionally, data center companies may have regulatory and public relation challenges trying to place some technologies, such as nuclear reactors, in suburban localities like Loudoun and Prince William.

On-site generation could help solve data center companies’ power problems, but they may not substantially reduce generation and transmission infrastructure needs. Several data center companies indicated that they were pursuing on-site generation as a primary power source but planned to rely on the main grid for backup. Because electric utilities have an obligation to serve all customers in their service territory, they would still need to build the infrastructure necessary to provide power to these sites, even if they are only serving in a backup capacity.

On-site generation could also shift new infrastructure costs to other customers, because infrastructure costs are recaptured through utility billings, and a data center using an on-site generation would not be regularly billed for services. It is possible that utilities could reach agreements with data center companies to provide reduced or non-firm levels of service if only serving in a backup capacity, which would reduce the need for additional utility infrastructure and cost impacts on other customers. However, it is not clear whether data centers would enter into such agreements. State law could be changed to address the potential issue of stranded costs from data centers that use on-site generation, but as of today, this is not occurring and only one data center site in Virginia appears to actively rely on on-site generation for a substantial share of its energy needs.

Appendix J: Power usage effectiveness (PUE) ratios

The efficiency of cooling and other building systems in data centers is commonly measured using a Power Usage Effectiveness (PUE) ratio. For example, a PUE of 1.3 indicates that 1.0 of energy is used for computing activity, and 0.3 is used for all other building systems. A PUE of 1.0 would indicate perfect efficiency, where all energy is used for computing activity, and none is used for any other purpose. Importantly, PUE does not measure how energy efficient a data center's computing is, because energy used for computing is always set equal to 1.0. Consequently, a lower PUE does not indicate if a data center is energy efficient as a whole. PUE only measures the efficiency of cooling and other building systems that support facility operations.

The data center industry has a strong market incentive to be energy efficient because energy is one of data centers' largest operating costs. Data centers regularly upgrade their computing equipment to take advantage of newer, more powerful and energy-efficient computer chips. Computer chips' performance per watt has improved annually for decades. Data centers have also made big efficiency gains with their building systems. As recently as 10 years ago, PUEs of 1.9 or above were common across smaller enterprise and colocation data centers. With the consolidation of the industry into large hyperscale facilities, large companies now report fleetwide average PUEs of 1.1 to 1.4. However, some companies may continue to have less efficient building systems because there are also strong market incentives to avoid changes that could disrupt operations, such as installing more efficient cooling systems.

At least one European country, Germany, has passed legislation requiring data centers to achieve lower PUE in the near future (1.2 to 1.3, depending on when the data center was constructed), and similar legislation has been proposed in Virginia. A PUE requirement could have two unintended consequences: (1) it could encourage more water use by the industry, because water-dependent cooling uses less energy, and could make it harder for companies that use dry cooling systems to comply, and (2) companies that operate colocation data centers may be less able to comply because they do not control operational decisions that can affect PUE calculations, such as how much computing space tenants use. A PUE requirement for existing data centers would also create fairness issues, because companies that have chosen to use cooling systems that are more water efficient but less energy efficient may be unable to comply with the requirement, solely based on the type of cooling they chose before a PUE requirement was established.

Appendix K: Additional natural resource considerations

Additional concerns about data center operations' impacts on natural resources, including their wastewater discharges, disposal of electronic waste, and diesel fuel carbon footprint, have also been raised. While significant adverse impacts to Virginia's natural resources may not occur from these, an environmental management standard, such as ISO 14001, could encourage data centers to reduce their impacts where possible. (See Chapter 5 for more information on environmental management standards.)

Because of existing regulations, data center wastewater discharges do not appear to pose ecological harms

Data centers that use water in their cooling systems typically discharge only a small portion of it, but when discharges do occur, the discharges may contain relatively large concentrations of salts, other dissolved solids, and chemical additives. Some stakeholders expressed concern that data centers and/or wastewater treatment plants do not filter out the salts and any other chemicals before discharging the water to a Virginia surface water source, contributing to the degradation of water quality.

Federal and state wastewater regulations appear to protect against these risks. DEQ requires permits for wastewater discharges from utilities and other large dischargers. These permits set limitations on the contents of discharges and require water quality monitoring to ensure that discharges do not degrade water sources. Some data centers have their own discharge permits, but most send their discharges to a wastewater utility. In either case, the permit holder must ensure any wastewater is appropriately treated before discharging it into a water source. If a wastewater utility is not capable of adequately treating discharge from a data center customer, the utility can require the data center to pretreat its discharges.

Some stakeholders were concerned that existing wastewater regulations were not sufficient to protect water resources, but any potential shortcomings would be true for other development types, so data center-specific standards are not necessary. However, a certification to ISO 14001, which requires companies to meet all environmental regulations, may encourage additional voluntary commitments from data centers to reduce any wastewater impacts.

Electronic waste faces little regulation, but existing practices divert some servers from landfills

Data centers are packed full of thousands of servers, and these servers are replaced every three to five years. Servers can contain rare and toxic materials. The process to procure these materials for use in servers can be environmentally harmful, as can improper disposal of the toxic materials. The reuse or recycling of servers and server parts can minimize environmental impacts.

Data centers, like other businesses, are not required by federal or state law to reuse or recycle electronic waste, but existing practices divert some servers from Virginia landfills. Many data center companies have sustainability goals related to electronic waste, including reusing, recycling, or donating old servers or old server parts. Additionally, not all local waste management services and landfills in Virginia

accept commercial waste and/or electronic waste, which would force data centers to seek other alternatives to dispose of their old servers.

Requiring data centers to meet an environmental management standard, such as ISO 14001, would require data centers to consider any environmental impacts caused by their waste generation. This could complement existing practices and discourage disposal of data center servers in Virginia landfills, if, and where, it does occur.

Few data centers currently use diesel fuel alternatives because of supply limitations

Use of diesel fuel—the fuel commonly found in data centers’ backup generators—leads to greenhouse gas emissions. Data center operators are interested in expanding the data center industry’s use of alternative fuels, such as hydrotreated vegetable oil (HVO), to lower data centers’ carbon footprints. These alternatives can be used in most existing diesel generators. However, while these fuel alternatives are available for and used by data centers in Europe and California, the East Coast does not have a supply chain for these fuels. This makes it more expensive and logistically challenging for Virginia data centers to use these fuel alternatives.

Some data center companies are making efforts to expand the use of alternative fuels. For instance, some have requested DEQ permit approval to use HVO in their generators—as DEQ approval of fuel choice is needed as part of emission regulations—and the industry has reached out to the Virginia Economic Development Partnership about exploring ways to attract the fuel alternative industry to Virginia to increase local availability. While a requirement to use a fuel alternative may not currently be feasible, an ISO 14001 requirement could further encourage industry efforts to review and seek opportunities to limit their carbon footprints where possible.

Appendix L: Data center planning and zoning changes in Fairfax, Loudoun, and Prince William

In recent years, the three Virginia localities with the most data centers have revised their approaches to regulating the industry and initiated studies to consider additional changes. Sites in Loudoun, Prince William, and Fairfax account for 80 percent of data centers in the state. Since 2019, all three localities have adopted changes to their ordinances or other policies relating to data centers. For example, all three localities added minimum requirements for data centers to their zoning ordinances. Additionally, all three localities began official studies of their data center policies, with Loudoun and Prince William planning votes in 2026 by their boards of supervisors in response to study findings. Table L-1 summarizes key changes by Fairfax, Loudoun, and Prince William related to data center planning and zoning processes since 2019.

TABLE L-1
Fairfax, Loudoun, and Prince William have updated data center policies since 2019

Locality	Planning and zoning actions
Fairfax	<p>Comprehensive zoning update with changes specific to data centers (effective 7/1/2021)</p> <ul style="list-style-type: none"> Recognized data centers as distinct use instead of being considered a type of telecommunications facility Prohibited data centers in residential and certain commercial zones; requires special permit in certain commercial and industrial zones if exceeds specified size Established county's first design standard specific to data centers: requiring enclosure of equipment in certain zones <p>Data center study (initiated 5/9/23)</p> <ul style="list-style-type: none"> Process included public meetings and stakeholder interviews Produced two staff reports and a consultant report <p>Zoning changes (effective 9/11/24)</p> <p>Board of Supervisors considered study's recommendations and implemented several rules to better manage data center development</p> <ul style="list-style-type: none"> Prohibited data centers in additional zone; converted several zones from allowing data centers by right to allowing by special permit; expanded requirement for special permit if exceeding specified size to another industrial zone Required 200 feet between data center building and residential property; required 300 feet (or a building) between equipment and residential property Required 1 mile between data center and Metro station Required sound studies at two stages of new projects Required several architectural standards (e.g., façade differentiation) of by right development, with more flexibility but the same goals for special permit developments
Loudoun	<p>Rewrite of comprehensive plan (adopted 6/20/2019)</p> <p>Items for priority future action included performance standards for data centers</p> <p>Series of meetings about data center policies by legislative committee (2022)</p> <p>Initiated to review county staff research and develop process for considering changes to data center policies</p> <p>Comprehensive zoning update includes changes specific to data centers (effective 12/13/2023)^a</p> <p>Goal to align zoning ordinances relevant to data centers with comprehensive plan</p>

- Converted two zones from allowing data centers by right to allowing by special permit; permitted data center in an additional industrial zone
- Expanded applicability of data center standards (e.g., façade architecture, screening of mechanical equipment) from four zones to all locations
- Created standards for data centers regardless of location including windows, main entrance features, loading bay location, and proactive sound measuring
- Created standards for data centers adjacent to residential areas including separation of mechanical equipment, minimum 200-foot setback between buildings and property border, parking setbacks, time limits on generator testing, and acoustic barriers around mechanical equipment

Study of potential changes to comprehensive plan and zoning ordinances for data centers and substations (initiated 2/6/2024)

- First phase focusing on appropriate locations for data centers per the comprehensive plan and zoning ordinance, expected to conclude early 2025
- Second phase to focus on policies and zoning ordinances to implement data center standards (e.g., aesthetics, natural resources), expected to conclude 2026

Prince William

Additional standards required in data center overlay district (adopted 6/18/2019)

- Created requirements for data centers in the data center overlay district, including for building façade and fence design, screening mechanical equipment and substations near residential areas and certain roads, and buffer yards of data centers near residential areas
- To encourage data center development in the overlay, increased density allowed by right within the overlay
- Adjusted borders of data center overlay on map

Comprehensive review of data center overlay (initiated 3/2/2021)

- Scope included zoning ordinance, comprehensive plan, and other formal county policies
- Products included reports by county's economic development office and two consultants regarding data center industry trends, appropriate land in Prince William, and recommended standards for development
- Process included public meetings and stakeholder interviews

Data center ordinance advisory workgroup (created 2/28/2023)

Responsible for continuing review of county's data center policies. Draft timeline includes Board of Supervisors vote on noise ordinance amendments in spring 2025 and vote on policy changes relevant to other topics later in 2025.

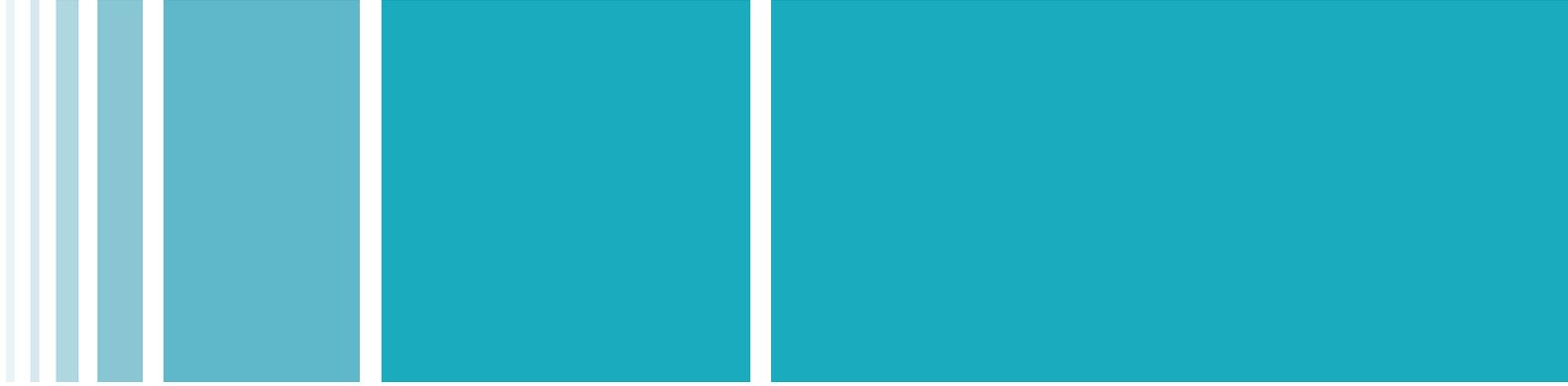
Expanded noise ordinance applicability to data centers (adopted 2/28/2023)

- Limited exemption for nighttime cooling systems to residential homes
- Originally planned to sunset in a year but extended to provide time to "assess the noise impacts associated with data centers"

SOURCE: JLARC review of local ordinances, review of planning and zoning department documents, and interviews with local staff.

NOTE: Table describes significant changes since 2019 and is not a summary of current ordinances. Table focuses on planning and zoning processes and excludes changes to economic development and tax policy. Table excludes requirements limited to particular projects (e.g., rezoning commitments). "Special permit" is used for consistency, but the terminology for this process depends on the locality.

^a Updates do not apply to certain parts of the county, which are administered under an older zoning ordinance.



JLARC.VIRGINIA.GOV

919 East Main Street Suite 2101 Richmond, VA 23219

Kopinski, Sara

From: Iwicki, Brad
Sent: Wednesday, October 29, 2025 12:13 PM
To: Kopinski, Sara
Subject: FW: Opposition to Proposed Data Center – Case DEV-0057-2025 (Karis Critical Data Centers)

FYI – POD Data Center public comment

Brad Iwicki

Assistant Planner | Planning & Development – TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 305-7021 | iwickib@naperville.il.us

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From: Steve Jarvis [REDACTED]
Sent: Wednesday, October 29, 2025 11:40 AM
To: Planning <Planning@naperville.il.us>; Derek.Naperville@gmail.com
Cc: Holzhauer, Ian <Ian.Holzhauer@naperville.il.us>
Subject: Opposition to Proposed Data Center – Case DEV-0057-2025 (Karis Critical Data Centers)

You don't often get email from [REDACTED] [Learn why this is important](#)

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To the Naperville Planning and Zoning Commission:

My name is Steve Jarvis, and I am a resident of the Naper Commons community. I am writing to urge you not to recommend approval of the proposed Karis Critical Data Center (Case DEV-0057-2025), which is

scheduled for discussion at the November 5th meeting.

Naper Commons is a relatively new and vibrant community that embodies the spirit of Naperville which is safe, welcoming, and family-oriented. Our neighborhood has quickly developed a close-knit feel, with families regularly walking along the city sidewalks, children playing at Naper Commons Park, and residents enjoying the quiet suburban environment. I invite you to drive through our community to see firsthand how peaceful and active it is.

The proposed data center would fundamentally alter that environment. Residents purchased their homes with the understanding that nearby developments would be consistent with the surrounding residential character, not an industrial-scale facility housing 24 diesel backup generators.

Although the proposal claims that the generators would only operate periodically for testing, the recent power outage on Monday, October 27th, lasting several hours, raises legitimate concerns. In such an event, all 24 generators would be running simultaneously, creating significant noise pollution and airborne emissions from diesel exhaust. These conditions pose potential health risks to residents, particularly children and older adults, and would severely impact the neighborhood's air quality and livability.

As a father of a 4½-year-old boy, I am especially concerned about the impact this facility could have on the health and safety of our children. Families moved to Naper Commons to give their kids a safe, quiet place to grow up—not to live next to heavy industrial operations and diesel fumes.

Beyond the environmental and health implications, a large data center would increase traffic, require heavy infrastructure, and visually dominate the area—eroding the character of a community that was built for families, not industrial development.

I ask you to consider whether you would want such a facility operating just beyond your backyard, affecting the peace, safety, and quality of life for your family.

Please stand with your fellow Naperville residents and recommend against approval of this project.

Steve Jarvis

Kopinski, Sara

From: [REDACTED]
Sent: Wednesday, October 29, 2025 1:06 PM
To: Kopinski, Sara
Subject: Fwd: DEV-0057-2025 – Public Hearing for 1960 Lucent Lane (Karis Critical Data Centers)

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Hi Sara,

I didn't receive a confirmation that the below email was received, so just wanted to check in... will the below email be included in the agenda packet/be forwarded to PZC?

Thank You!

[REDACTED]

----- Forwarded message -----

From: [REDACTED]
Date: Tue, Oct 28, 2025 at 10:15 PM
Subject: DEV-0057-2025 – Public Hearing for 1960 Lucent Lane (Karis Critical Data Centers)
To: <planning@naperville.il.us>

Good Evening,

Karis Critical is running paid advertisements on social media promoting their proposed development at 1960 Lucent Lane.

The advertisement includes materially false claims, including the following:

- The property has "40 acres of land that has sat vacant for the past 25 years"
 - They appear to have confused the date that the building was completed with the date that the building was vacated. Construction of the building wasn't completed until 2000, which makes it impossible to have sat vacant for 25 years since it was occupied soon after completion.
 - Source: [Chicago Tribune](https://www.chicagotribune.com/2000/10/11/lucent-in-the-limelight/) October 11, 2000:
<https://www.chicagotribune.com/2000/10/11/lucent-in-the-limelight/>
- The project will "create and sustain 341 jobs"
 - As you know from their sworn testimony during the public hearing, it's a false claim that they anticipate that 341 jobs will be sustained.

The advertisement also contains a direct link which requests signature of a pre-authored letter to City Council in support of the project.

It's deeply disturbing that the petitioner is deceiving individuals and then using their signature in furtherance of their goals.

The petitioner has already called their credibility into question by choosing a weekend over spring break for their sound study, and by omitting "unusually loud" sound readings, and I think this further demonstrates the nature of the petitioner for this project... approval at all costs. This nature should be taken into account when evaluating what other promises that they are making as you are weighing your decisions.

For your reference, here is a link to the petition which is attached to their advertisement:

<https://napervilledatacenter.com/take-action/#>

Thank You,

██████████

**** Please redact my name and email from publication ****

Kopinski, Sara

From: Iwicki, Brad
Sent: Wednesday, October 29, 2025 4:17 PM
To: Kopinski, Sara
Subject: FW: Public Comment Regarding Karis Critical Data Center Campus 1960 Lucent Lane

POD – Data Center Public Comment

Brad Iwicki

Assistant Planner | Planning & Development – TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 305-7021 | iwickib@naperville.il.us

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From: Callie Sharp [REDACTED]
Sent: Wednesday, October 29, 2025 2:16 PM
To: Planning <Planning@naperville.il.us>
Subject: Public Comment Regarding Karis Critical Data Center Campus 1960 Lucent Lane

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Good afternoon,

My name is Callie Sharp, and I am a resident of the Danada Woods subdivision in Naperville, right near the proposed site for the Karis Critical data center campus at 1960 Lucent Lane. I submit this comment in my capacity as a private citizen ahead of the Nov. 5 Planning and Zoning Commission meeting. I staunchly oppose the petition for development approval and any associated zoning changes/variances:

Perhaps the best part of my home is that it abuts what could be classified as a small wetland and is near the Danada Forest Preserve. Every day, I enjoy looking out my window and watching the insects, birds, and other animals that are abundant in the area, including a family of sandhill cranes that love to peer through my backdoor. This area is praised for its wildlife and trails. If the data center campus is permitted, these areas will experience increased heat, noise, light, and air pollution. Once these habitats are disturbed, it is incredibly difficult if not impossible to restore them. There have not been sufficient studies completed on the environmental impact of this proposal. The health and stability of our environment are at a critical point across the country – now is not the time to jeopardize them in Naperville.

I am also concerned about the impacts the proposed data center campus will have on my health and on the health of my neighbors, including many children. Threats to our health stem from noise (as explained during the last public meeting), light pollution, increased emissions, diesel exhaust, and more.

I further reiterate and incorporate the arguments of many other residents and health/environmental advocates about impacts to the grid, water and environmental concerns, public health threats, and economic issues via their written and oral comments for the previous public meetings. The “modifications” made to the proposal are insufficient to address the above concerns. It is foreseeable that Karis Critical intends to seek later approval for Phase 2 of the data center campus in the future. Splitting this project into two phases with two approval processes does nothing to alleviate the environmental, utility, health, and economic issues that it will cause. Further, Karis Critical's proposed "pledge" at the last public meeting amounts to nothing more than an unenforceable promise – these alleged assurances cannot be considered as a basis for approval.

To put it simply, the costs of this data center far outweigh any alleged benefits. This industrial facility is not a public necessity. I strongly urge you to listen to residents, to protect Naperville’s public health and natural resources, and to deny this proposal outright.

Please confirm your receipt of this public comment.

Thank you,

Callie Sharp

Kopinski, Sara

From: Egner, Therese
Sent: Thursday, October 30, 2025 9:05 AM
To: Kopinski, Sara
Subject: FW: Karis Data Center Proposal DEV-0057-2025

FYI

Therese Egner

Community Planner | Planning & Development - TED Business Group
City of Naperville | 400 S. Eagle St. Naperville, IL 60540
(630) 420-4179 | egnert@naperville.il.us

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From: Katie Toolan <[REDACTED]>
Sent: Wednesday, October 29, 2025 4:40 PM
To: Planning <Planning@naperville.il.us>
Subject: Karis Data Center Proposal DEV-0057-2025

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My name is Katie Toolan and I am a resident of Naperville. I am writing to express my concerns regarding the proposed data center. My home is not in the immediate vicinity of the proposed project but I believe it will have huge implications for all Naperville residents. Many other towns that have welcomed these data centers are now rethinking, if not completed regretting this decision. Lessons should be learned from what is happening in Aurora. How is Kavis going to ensure the same fate will not be suffered by Naperville. A pledge? A pledge is not legally binding and essentially amounts to a pinky promise in the eyes of the law. I request this decision be reserved until more information and research can be obtained to ensure an educated decision can be made. Naperville carries the title as one of the best places to live in the country. Lets keep it that way.
Thank you for your consideration.

Kopinski, Sara

From: Egner, Therese
Sent: Thursday, October 30, 2025 9:05 AM
To: Kopinski, Sara
Subject: FW: Public Input for the November PZC Hearing for Karis Critical Data Centers (DEV-0057-2025)

FYI

Therese Egner

Community Planner | Planning & Development - TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

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From: Marilyn L Schweitzer [REDACTED]
Sent: Wednesday, October 29, 2025 4:53 PM
To: Planning <Planning@naperville.il.us>
Cc: Wehrli, Scott [REDACTED]; Holzauer, Ian [REDACTED]; White, Benny [REDACTED]; Kelly, Patrick [REDACTED]; Syed, Ashfaq [REDACTED]; McBroom, Josh [REDACTED]; Wilson, Nate [REDACTED]; Gibson, Mary [REDACTED]; Jain, Supna [REDACTED]
Subject: Public Input for the November PZC Hearing for Karis Critical Data Centers (DEV-0057-2025)

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Planning & Zoning Commissioners,

Please do not recommend this Data Center to built at 1960 Lucent Lane:

- A Data Center of this scale is inappropriate to be in such close proximity to residential areas.
- A Data Center of this scale inconsistent with the [2022 Land Use Plan](#) for this area to be Medium Density Residential.
- Approving a Data Center at this location is premature given the [2025 Naperville I-88 Corridor Strategy](#) recommendations.

- The noise, environmental impact, and impact of the electric power consumption of a Data Center of this scale are largely uncertain at this time.

Please consider the following:

- A place type of Medium Density Residential, as stated in the [2022 Land Use Plan](#), means uses compatible with R2 and R3 zoning. Conditional uses for R2 and R3 zoning do not include Data Centers as either permitted or a conditional use. Data Centers are only permitted as a conditional use in the two most intensive [zoning designations](#): Office, Research, and Light Industrial (ORI) and Industrial (I). **Conditional use for a Data center is in conflict with the adopted comprehensive master plan.**
- The [2025 Naperville I-88 Corridor Strategy](#) states residential demand as an opportunity for the I-88 corridor. This parcel, along with Naper Commons and the remaining Nokia property, is **the only area along the I-88 Corridor** in the [2022 Land Use Plan](#) with the future designated Land Use of Medium Density Residential. The rest of the I-88 Corridor that was studied was designated either as a Regional Center or Employment Center. Approving a Data Center in what has been proceeding to become residential will make it more difficult to include residential components along the I-88 Corridor. It will sow community, business owner, and developer mistrust. **It is highly likely to diminish and impair property values in the neighborhood and potential residential property values anywhere else in the I-88 corridor.** A Data Center at this location is complete opposite of “the City and NDP’s goal of a more vibrant, walkable, mixed-use, ‘live-work-play’ environment along I-88”. (Note, a further I-88 Corridor Study to establish place types and achieve other recommendations for the corridor is under budget considerations for 2026.)
- Approving Phase I of the Data Center when staff cannot yet recommend approval of Phase II is poor planning. Phase II has not been dropped from the overall plan. Phase II is merely not yet being asked for at the moment. (I’ve been told the development needs Phase II to ultimately become profitable.) Even if Phase II were to be totally dropped, what would go in there remaining acreage? There doesn’t seem to be any proposal except to get Phase I approved now and request Phase II in the future. This approach is putting camel’s nose under the tent. **Conditional Use for a Data Center will impede the normal and orderly development and improvement of the adjacent property**, e.g the remaining 20 acres and the future of the remaining Nokia property which is also has a place type of Medium Density Residential.
- For comparison, the electrical usage for Phase I is like concentrating half of the entire 2011 electrical usage at Fermilab into a single building on roughly 20 acres and only 1/4 mile from residences. If Phase II were to be built it would be similar to concentrating all of the 2011 electrical usage at Fermilab in only 2 buildings, on roughly 40 acres, and only about 300 ft from residences. (2011 was the peak year of electrical usage from 2008 to 2021 as stated in the [2021 Fermilab Site Sustainability Plan](#).)
- Naperville is struggling planning for our future power needs. The choice has pretty much been to accept an open-ended contract or proceed in a new direction. We do not need the unknowns of this data center or other data centers to complicate the risk at least at this time.

This Data Center should not be recommended or approved. Data Centers along the I-88 corridor should not be approved until the noise/environmental/power are better understood and until further I-88 Corridor studies as recommended are complete.

Thank you for your consideration.

Marilyn L. Schweitzer
Naperville/IL

Kopinski, Sara

From: Egner, Therese
Sent: Thursday, October 30, 2025 9:06 AM
To: Kopinski, Sara
Subject: FW:

FYI

Therese Egner

Community Planner | Planning & Development - TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 420-4179 | egnert@naperville.il.us

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From: Eric Ploch <[REDACTED]>
Sent: Wednesday, October 29, 2025 4:54 PM
To: Planning <Planning@naperville.il.us>
Subject:

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Naperville Planning and Zoning Commission,

My name is Eric Ploch, and I am a resident of the Naper Commons community. I am writing to strongly urge you not to recommend approval of the proposed Karis Critical Data Center (Case DEV-0057-2025), which is scheduled for discussion at the November 5th meeting.

Our community at Naper Commons is relatively new but hasn't wasted any time establishing ourselves in the spirit of Naperville. Much like the city that you love, our neighbors have established a community that is safe, welcoming, and family-oriented. Surrounded by not only growing families, we have plenty of wildlife friends, considering the surrounding forrest preserve.

You can understand our concerns when we learned about the proposed data center, which if approved, would not only impact our tight-knit community but Naperville as a whole.

The long terms impacts of data centers are unknown and Naperville, and more specifically, Naper Commons, isn't the community where its members should become the test dummies for long-term and widespread impacts. In a growingly competitive space in the suburbs, neighboring towns have taken action to at least pause data center projects and/or hearings. Known as one of the premier suburbs in the United States, it would be counterintuitive to the goals of Naperville and its image, to approve this project.

Going beyond the optics of this project for the city, the environmental concerns (as we know them) are impossible to deny. Look no further than the recent power outage on Monday, October 27th, lasting several hours. In such an event, all 24 generators would be running simultaneously, creating significant noise pollution and airborne emissions from diesel exhaust. These conditions pose potential health risks to residents, particularly children and older adults, and would severely impact the neighborhood's air quality and livability. While nothing is worth it when it comes to potential harm to the community, the fact that few jobs would be added and tax revenue wouldn't even go back to our schools (our community is mapped to Wheaton schools), the juice certainly isn't worth the squeeze.

As a father of a 2-year-old girl and 6-month-old boy, I can't fathom a project liking this being in their backyard. My wife and I moved from Chicago in 2023 to Naperville to give our kids a safe, quiet place to grow up—not to live next to heavy industrial operations and diesel fumes.

Most importantly, I ask you to consider what you would want if in our shoes. Beyond that, if approved, can you look in the mirror years down the road should unknown or unintended consequences be found from this project that negatively impact the youth of our community?

Please stand with your fellow Naperville residents and recommend against approval of this project.

Thank you!
The Ploch Family

Kopinski, Sara

From: Iwicki, Brad
Sent: Wednesday, November 19, 2025 9:13 AM
To: Kopinski, Sara
Subject: FW: Comment for 11/19 meeting on Karis Data Center

After 5:00pm - POD - Data center public comment

Brad Iwicki

Assistant Planner | Planning & Development – TED Business Group City of Naperville | 400 S. Eagle St. Naperville, IL 60540
(630) 305-7021 | iwickib@naperville.il.us

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-----Original Message-----

From: Weronika Malek [REDACTED]
Sent: Tuesday, November 18, 2025 6:56 PM
To: Planning <Planning@naperville.il.us>
Subject: Comment for 11/19 meeting on Karis Data Center

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Dear Planning and Zoning Commission,

As a resident of Naperville (Naper Commons) and a taxpayer in Naperville, I am strongly opposed to the proposed Karis Data Center on Warrenville Road. I submitted my opposition before the previous meetings and I decided to reiterate it before the vote, because the experts (doctors, noise specialists, environmentalists) public comments made me ever more concerned and worried than I was before. Naperville is a family-friendly city which prides itself to be called the best city to live in rankings; I personally know many families who moved here from out-of-state (without pre-existing ties or even jobs, since they work remotely) solely based on that reputation. Regardless what the Karis claims about their good will, the data center is against the values Naperville stands for (environment and family friendly) and is an unnecessary risk to our community: even if everyday operations claim to be quiet, the risk of diesel generator noise or leakage is simply too catastrophic to ignore if it happens. Why should we risk it?

Sincerely,
Weronika Malek-Lubawski, Ph.D.

Kopinski, Sara

From: Iwicki, Brad
Sent: Wednesday, November 19, 2025 12:06 PM
To: Kopinski, Sara
Subject: FW: Executive Summary - Oppose Data Centers Near Neighborhoods

POD – Data Center public comment

Brad Iwicki

Assistant Planner | Planning & Development – TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 305-7021 | iwickib@naperville.il.us

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From: Rich Janor [REDACTED]
Sent: Wednesday, November 19, 2025 11:39 AM
To: Planning <Planning@naperville.il.us>
Subject: Executive Summary - Oppose Data Centers Near Neighborhoods

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Good Morning,

Please forward the following information to the Planning and Zoning Commission members. I sent this to some commissioners directly, but it was recommended that I also submit via official City of Naperville channels.

EXECUTIVE SUMMARY

OVERALL

Data centers are important, but don't belong within walking distance of homes, quiet neighborhoods, parks, sensory playgrounds (playforalldupage.org), schools, walking/biking trails, and forest preserve. Data centers, by definition, are industrial facilities and belong in truly industrial areas. Perhaps the City can identify a different location for a facility like this.

ROLE OF PLANNING AND ZONING COMMISSION

The "P" in PZC obviously stands for PLANNING. How can the City support a brand new residential subdivision (Naper Commons) and then bring in a heavy industrial facility right next to it? This isn't good planning. Makes no sense. Tax dollars and jobs are nice, but this development in this location is categorically wrong. We know the PZC doesn't have the final word, but you ARE the first line of defense against ill conceived projects like this, and your voice IS respected and important.

COMMUNITY DOESN'T WANT THIS

40+ speakers publicly opposed this development at the last PZC meeting and 300+ people packed the meeting. Other than the petitioner's attorney, NOT ONE resident spoke in favor of this development. The speakers were mainly professionals...business owners, engineers, tech executives, doctors, lawyers, chemists, relatable moms and dads of young children, etc. Smart, educated people. A letter signed by 25 local doctors. 100% opposed.

The petitioner has retained a lobbyist/public relations firm to try to put a positive spin on this within the community. This firm has many years of history in our community, yet they failed to recruit one single speaker to publicly support this. Almost four hours of public comment and other than the petitioner's attorney, not one citizen was there to speak publicly in favor of this project. Not one. The community doesn't want this.

KNOWN AND UNKNOWN

There are numerous cases we could point to that clearly demonstrate how data centers are detrimental to neighborhoods and local communities. These are known. The unknowns are even more daunting. Can the petitioner say unequivocally that this development will not pollute and/or endanger public health? Absolutely not. They can only offer pie-in-the-sky talking points like "all data centers aren't created equal" and "stewardship pledges" that aren't worth any more than the paper they are printed on.

BACKGROUND OF THE DEVELOPER

It appears the petitioner has absolutely no track record of building data centers. RED FLAG! It also appears Karis has utilized a layered LLC structure. The strategy of creating multiple, separate LLCs is often utilized to isolate liabilities. If a lawsuit occurs against one LLC, the other companies and the parent company's assets are shielded from the claim. Slick move on the petitioner's part. RED FLAG!

In response to this concern, the petitioner's attorney offered the following defense to the PZC: both he (the attorney) and some guy "Bill" live in Naperville. Not a valid defense.

"MISINFORMATION"

Kopinski, Sara

From: Iwicki, Brad
Sent: Wednesday, November 19, 2025 4:28 PM
To: Kopinski, Sara
Subject: FW: Proposed Data Center

POD - Data Center public comment

Brad Iwicki

Assistant Planner | Planning & Development – TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 305-7021 | iwickib@naperville.il.us

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From: berncads@aol.com <[REDACTED]>
Sent: Wednesday, November 19, 2025 12:59 PM
To: Planning <Planning@naperville.il.us>
Subject: Proposed Data Center

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To Naperville Planning Commission:

I am writing in opposition to the propose data center to be located on the previous Lucent site. I strongly believe the impacts to our community will be severe and irreversible.

Data centers are known to consume massive amounts of water and energy leading to increased utility costs, noise pollution and environmental damage.

I am also deeply concerned for the potential safety risks of contamination from fill materials and storage of large amounts of fuel for back up generators.

As a resident of Naperville for more that 30 years I feel the minimal amount of potential jobs does not outweigh the dangers and irreversible harm to the community.

Sincerely,

Bernadette Cadman

Kopinski, Sara

From: Iwicki, Brad
Sent: Wednesday, November 19, 2025 4:28 PM
To: Kopinski, Sara
Subject: FW: PRZ Nov 19, 2025 Submission - Clarity Around Air Emissions.

POD - Data Center public comment

Brad Iwicki

Assistant Planner | Planning & Development – TED Business Group
City of Naperville | 400 S. Eagle St. Naperville, IL 60540
(630) 305-7021 | iwickib@naperville.il.us

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From: Timothy Ferritto [REDACTED]
Sent: Wednesday, November 19, 2025 2:48 PM
To: Planning <Planning@naperville.il.us>
Subject: PRZ Nov 19, 2025 Submission - Clarity Around Air Emissions.

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To the Members of Naperville's Planning and Zoning Advisory Board,

Over the past several PRZ meetings, several speakers have raised concerns about air emissions. Many of these claims have been exaggerated or based on misunderstandings of how emissions are regulated, measured, and controlled in the United States. This letter is to provide clarity with facts so a more informed decision can be made.

My name is **Tim Ferritto**, and I worked in the oil refining and petroleum products industry for 30 years. Emissions from fuel combustion were a central part of several of my roles, and I have extensive experience with the regulations, technical standards, and engineering changes that have shaped today's air quality rules.

Because there is a great deal of confusion and misinformation surrounding this topic, it is helpful to begin with a brief history.

Clean Air Act Reform and Emissions Reductions

In 1990, Congress passed major amendments to the Clean Air Act of the 1970s. These amendments established federal monitoring and control programs for specific air pollutants and directed the U.S. EPA to design and administer national strategies to reduce them over time.

Fuel producers and engine manufacturers were required to reformulate fuels and redesign engines to meet new EPA specifications. This led to substantial investments in hydrotreating, emissions-control technologies, and engine upgrades. As a result of these measures, emissions and their precursors from transportation sources have been reduced by approximately **99% from 1990 baseline levels**. The EPA has stated that the reductions achieved—completed more than a decade ago—bring pollutant concentrations to levels that pose **very low risk** to public health. (Hazard and risk are not the same; risk depends on both concentration and duration of exposure.)

Key Points Relevant to Diesel Generators (see Exhibits 1 & 2 down below)

1. Ultra-Low Sulfur Diesel (ULSD)

- Diesel sulfur levels have been reduced from roughly **5,000 ppm** pre-1990 to **10–15 ppm** today (over a **99% reduction**).
- The 15 ppm specification at the wholesale/retail level accounts for small sulfur contributions from distribution systems.

2. Modern Engine Standards (Tier Levels)

- In 1990, diesel-powered generators had very limited emissions requirements.
 - Since then, they have progressed through the EPA's Tier system to **Tier 4 Final**, which drastically reduces particulate matter (PM), nitrogen oxides (NOx), and other precursors.
 - These reductions are comparable to those required for heavy-duty trucks and buses, which now meet similarly stringent emission standards.
 - Tier 4 Final generators reduce emissions to levels low enough that they effectively eliminate meaningful **risk**, especially for emergency-use engines that operate only a few hours per year.
-

Understanding Hazard vs. Risk

A substance can present a **hazard**, but the actual **risk** depends on the concentration present in the air and the duration of exposure. I have attached a reference explaining this distinction. This is central to how EPA evaluates and regulates emissions. (see EPA Link at bottom)

Particulate Matter (PM) Clarification

The EPA regulates two primary categories of particulate matter:

- **PM₁₀** (particles ≤ 10 micrometers)
- **PM_{2.5}** (particles ≤ 2.5 micrometers)

These particles come from many natural and non-combustion sources such as wildfires, dust, soil, sand, agriculture, and atmospheric chemical reactions. The Canadian wildfires last year are a prime example of how PM levels can spike due to natural events unrelated to local fuel combustion.

Regarding **PM_{2.5}**, it can be:

- **Directly emitted** from combustion, or
- **Formed indirectly** in the atmosphere from precursors (SO₂, NO_x, and ammonia).

Historically, most **PM_{2.5}** was formed **indirectly**, but indirect formation has dropped dramatically because sulfur dioxide (SO₂) and nitrogen oxides (NO_x) have been reduced nationwide. Ammonia remains a precursor, but its primary source is **agriculture**, not generators. If secondary reactions take place, they happen in the atmosphere away from the ground source therefore would not impact neighborhoods around source.

Summary and Relevance to Local Data Center Projects

Today's **ultra-low sulfur diesel** combined with **Tier 4 Final** diesel generators—especially for **emergency-only** use—results in emissions so low that they do **not pose a risk** to surrounding communities.

This conclusion is supported by:

- The **U.S. EPA** under administrations of both political parties, and
- The **Illinois EPA**, which developed its standards with input from environmental groups.

For comparison, a recent data center project in Elk Grove, IL was approved using **lower-tier (Tier 2)** generators, and the Illinois EPA required only about half of them to install diesel particulate filters (DPFs). The regulatory focus is on **risk reduction**, not eliminating every theoretical hazard.

Thank you for your time and consideration. I am happy to answer any technical questions the Board may have.

Respectfully,
Tim Ferritto

Exhibit 1:

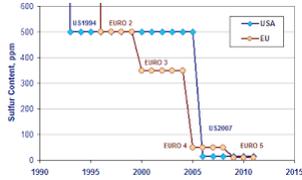
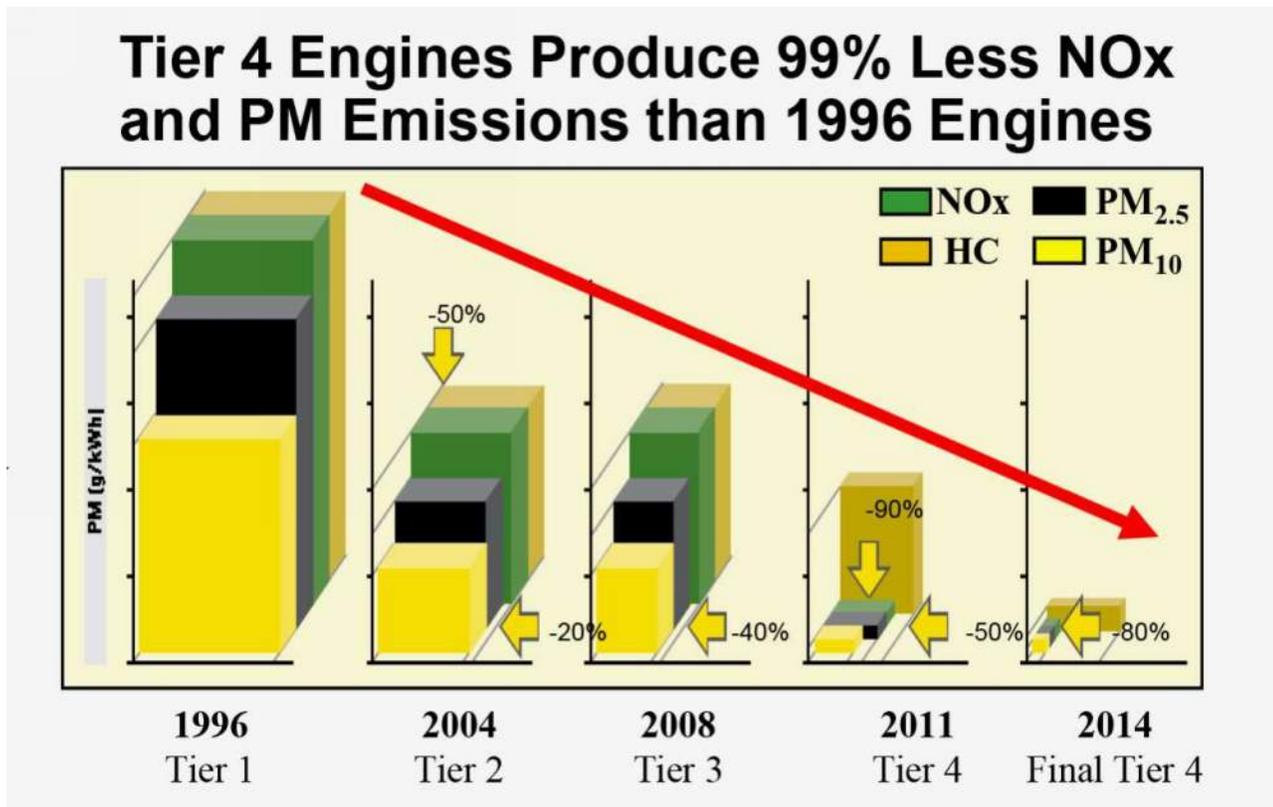


Exhibit 2:



EPA Link:

<https://www.epa.gov/criteria-air-pollutants/naaqs-table>

Kopinski, Sara

From: Iwicki, Brad
Sent: Thursday, November 20, 2025 9:31 AM
To: Kopinski, Sara
Subject: FW: Concerned Citizen Data Center

POD – Public comment Wednesday

Brad Iwicki

Assistant Planner | Planning & Development – TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 305-7021 | iwickib@naperville.il.us

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From: Ruth Dombrowski <[REDACTED]>
Sent: Wednesday, November 19, 2025 7:16 AM
To: Planning <Planning@naperville.il.us>
Subject: Concerned Citizen Data Center

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Dear Planning and Zoning Commission,

My husband and I attended the last meeting regarding the Karis Data Center on November 5. We do not live in the community adjacent to the proposed Data center. We are concerned citizens. We are residents of Naperville since 1987. We live in the Westglen Subdivision. We strongly believe that this Data Center should not be approved in the city of Naperville for the many reasons that were voiced by the residents of the adjoining subdivision.

Naperville used to be very diligent about what they approved to be built here. Due diligence no longer exists. Today, if someone has the money and they are willing to pay, the project approval goes forward. Just because an entity proposes a project does not mean that it should be approved. My concerns are many including those stated below:

1. This project does not belong adjacent to neighborhoods, and nature spaces intended for public use. How would you feel if this project were proposed near your home and your children and family were exposed to all of the toxic noise and chemicals.
2. We do not know enough about these data centers and their impact on community and environment. Additionally, the Naperville Building Codes are not up to date enough to address data centers.
3. There is great concern about the demand for electricity and water a data center uses. What will be the impact on residents and the community in regard to water and electricity access, shortages, and utility rates and bills?
4. Are there tax incentives? There should be no tax incentives. They should be paying full taxes to support the community. I do not get tax incentives.
5. There is no transparency regarding the owner/operator. Is this foreign owned? Is the operator a foreign entity? What is there to hide?
6. Is Naperville signing an NDA? There should be full transparency if there is nothing to hide. No NDA.

I ask that Naperville take their pride, ownership, and respect for their residents back. We do not need Big Brother. We need to maintain our proud status as one of the best cities to live in the nation. We should not allow this data center to be built. Please respect the voices and concerns of your residents. Please respect our beautiful city of Naperville.

Respectfully,

Ruth Dombrowski

Kopinski, Sara

From: Egner, Therese
Sent: Thursday, November 20, 2025 1:17 PM
To: Kopinski, Sara
Subject: FW: Air Quality Expert
Attachments: Letter re diesel exhaust_11-2025.docx

Follow Up Flag: Follow up
Flag Status: Flagged

FYI – A follow-up on DEV-0057-2025.

Therese Egner

Community Planner | Planning & Development - TED Business Group
City of Naperville | 400 S. Eagle St. Naperville, IL 60540
(630) 420-4179 | egnert@naperville.il.us

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From: Sarah Baugh <[REDACTED]>
Sent: Thursday, November 20, 2025 1:04 PM
To: Planning <Planning@naperville.il.us>
Subject: Fwd: Air Quality Expert

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Hi Team,

I realize this is a closed matter for you all as the vote has already occurred. However, when I say I'll do something, I do it. So, as promised, here is the letter (attached) from Dr. Susan Buchanan, MD, MPH, board-certified physician and public health expert, Director of the Great Lakes Center for Reproductive and

Children's Environmental Health at the University of Illinois Chicago, part of the EPA- and ATSDR-funded Region 5 Pediatric Environmental Health Specialty Unit.

Dr. Buchanan has served as an expert contributor in amicus filings and policy briefs on environmental health, reinforcing her credibility as an expert witness across medical, public health, and environmental science issues.

----- Forwarded message -----

From: **Buchanan, Susan Nathalie** [REDACTED]

Date: Wed, Nov 19, 2025 at 11:07 AM

Subject: RE: Air Quality Expert

To: Sarah Baugh [REDACTED]

|

See attached.



The Great Lakes Center for Children's Environmental Health

University of Illinois at Chicago § School of Public Health

1603 W. Taylor Street, Chicago, IL 60612

<https://childrensenviron.uic.edu>

To Whom it may concern,

I am writing regarding my concerns about the proposal for a data center to be located on the former Bell Labs/Lucent Tech site. This proposed data center will have a large number of industrial diesel back-up generators that will run for a specified period of time monthly for testing, and will run continuously during power outages.

As an environmental medicine physician, my expertise includes the health effects of exposure to contaminants in the air, water, and soil. The science on the health effects of inhalation of diesel exhaust is well established. The microscopic particles generated from burning diesel cause inflammation in the lungs which can lead to asthma. This particulate matter can also cause worsening symptoms in people with respiratory and cardiac diseases like emphysema and heart failure. Breathing diesel exhaust can make allergic symptoms worse. Also, according to the International Agency for Research on Cancer, diesel exhaust is a carcinogen.

This proposed data center will be located across the street from over 300 homes, and a short distance away from a playground. This means that during use of the generators either for back-up testing or during power outages, residents will be exposed to diesel particulate matter continuously for the duration of generator use. People who are exposed, especially vulnerable members of the community such as children, elderly, and those with respiratory or cardiac diseases, will be at risk of symptoms and increased risk for cancer.

I strongly recommend against the placement of diesel generators in such close proximity to the public.

Sincerely,

A handwritten signature in black ink that reads "Susan Buchanan". The signature is written in a cursive style with a long, sweeping tail on the final letter.

Susan Buchanan, MD, MPH

Director , Great Lakes Center for Reproductive and Children's Environmental Health

University of Illinois Chicago

Kopinski, Sara

From: Egner, Therese
Sent: Thursday, November 6, 2025 9:58 AM
To: Kopinski, Sara
Subject: FW: Letter from Physicians Opposing the Proposed Karis Data Center
Attachments: Letter to the Naperville Planning and Zoning Commission.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

FYI- DEV-0057-2025

Therese Egner

Community Planner | Planning & Development - TED Business Group
City of Naperville | 400 S. Eagle St. Naperville, IL 60540
(630) 420-4179 | egnert@naperville.il.us

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From: Sujay Shah <[REDACTED]>
Sent: Thursday, November 6, 2025 9:11 AM
To: Planning <Planning@naperville.il.us>
Subject: Re: Letter from Physicians Opposing the Proposed Karis Data Center

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Dear Members of the Planning and Zoning Commission,

Thank you for your time and consideration at the meeting yesterday (11/5). It was abundantly clear that the community is absolutely united in our opposition to the proposed Karis data center.

I hope that all of you do take the opportunity to read the medical document that was passed out at the meeting yesterday and that was emailed (I have attached again to this email for reference). I would like to highlight that the 25 physicians that have contributed to this document are experts in their fields and span numerous specialties: oncology, cardiology, internal medicine, and many others. The health risks from the data center discussed yesterday at the community meeting are evidence-based and supported by strong data.

I was very disappointed to hear the petitioner in his speech state that the members of the public were “misinformed.” This could not be further from the truth given the breadth of expertise and experience from physicians that spoke to the health risks and speaks to the petitioner’s lack of understanding (or concern) of the true health impacts of this proposed data center. This should be very concerning to the commission.

I, along with the physicians in our community remain available and welcome the opportunity to answer any questions you may have.

Sincerely,
Sujoy Shah, M.D.

From: Sujoy Shah <[REDACTED]>
Date: Wednesday, November 5, 2025 at 6:17 PM
To: planning@naperville.il.us <planning@naperville.il.us>
Subject: Letter from Physicians Opposing the Proposed Karis Data Center

Dear Members of the Planning and Zoning Commission,

My name is Sujoy Shah and I am a physician in the Naper Commons neighborhood, which is directly adjacent to the proposed Karis Data Center. As a medical oncologist, I have significant concerns regarding the numerous health impacts on surrounding communities, especially for young children with this proposal. These concerns are also shared by a number of physicians. Please find attached a letter from 25 physicians in our community that outlines the health risks supported by objective data and references. We strongly urge the commission to reject the Karis data center proposal to ensure the health and safety of our children, our families, and our future.

Sincerely,
Sujoy Shah, M.D.

To the Naperville Planning and Zoning Commission

November 5th, 2025

Naperville Planning and Zoning Commission

400 S. Eagle Street

Naperville, IL 60540

Dear Members of the Planning and Zoning Commission,

Introduction: Community Concerns and Multiple Risks

We are writing as deeply concerned residents and physicians of Naperville to express our strong opposition to the proposed Karis data center. While this proposal is presented by the developer as a high-tech economic opportunity, it carries very real and well-documented public health risks that fall disproportionately on nearby neighborhoods including most critically, families with young children.

Although the developer has altered their original request to currently focus on Phase 1, the fundamental risks and concerns for surrounding communities (with many homes just hundreds of feet from the facility) remain significant. The possibility of future expansion poses an additional risk.

Locating a large heavy industrial data center immediately adjacent to residential neighborhoods brings multiple risks:

- Hazardous emissions, with the use of dozens of diesel generators, that can have substantial adverse health impacts.
- Increased noise pollution - in particular, constant low frequency noise which has reportedly been associated with migraines and sleep disturbances for members of communities that neighbor data centers.
- Adverse upstream environmental impacts due to massive and constant energy requirements. This is especially concerning considering that approximately 80% of Naperville's energy comes from dirty coal plants, meaning the environmental impacts likely will extend beyond the immediate surrounding communities.
- Potential for further long-term industrial expansion which would exacerbate all the risks above even more.

Combined, these factors threaten the health, safety, and overall quality of life for the neighboring communities. As research and community experience have repeatedly shown, industrial developments of this scale are not compatible with the needs of neighborhoods

focused on raising families and protecting children. The multitude of risks above collectively should raise substantial concerns for the Planning and Zoning Commission.

As physicians residing in the neighboring Naper Commons community, we take this opportunity with supporting data to specifically focus on and further detail the significant adverse health impacts that can occur due to the proposed data center for surrounding communities, particularly for young children.

Diesel Exhaust: A Persistent Hazard for Cancer and Respiratory Diseases

Diesel exhaust is a complex mix of fine particulate matter (PM_{2.5}), ultrafine particles (<100nm), nitrogen oxides (NOx), and more than 40 toxic organic compounds (including benzene and formaldehyde). The World Health Organization has classified diesel exhaust as a Group 1 human carcinogen way back in 2012 – this is the same category as tobacco and asbestos (IARC 2012). U.S. public-health agencies note that diesel exhaust and PM_{2.5} cause adverse cardiopulmonary and carcinogenic risks even at low exposures; regulatory assessments therefore treat such emissions as posing measurable health risk even at ambient concentrations (U.S. Environmental Protection Agency [EPA], 2019). Essentially this means that every time humans are exposed to any amount of diesel emissions the risk of adverse health outcomes such as cancer goes up. The table below outlines the short-term and long-term health risks of exposure to toxic components from diesel exhaust:

Pollutant	Short-Term Effects	Long-Term Risks
NOx	Airway inflammation, asthma exacerbation	Chronic bronchitis, reduced lung growth in children
PM_{2.5} / Ultra Fine Particles	Irritation, headaches, sleep disturbance	Heart disease, cancer, developmental toxicity

Tier 4 Diesel Generators Still Emit Carcinogens and Should Not Be Placed Next to Neighborhoods

The developer has stated that they will utilize Tier 4 backup diesel generators, which utilize the most advanced emission control systems available on the market. However, this is not a sufficient mitigation when you have multiple surrounding neighborhoods with young children. It is important to remember that Tier 4 diesel generators do not eliminate PM_{2.5} and NOx emissions and in fact with real world use during startup or idle/low load situations with short runs, there can be substantial short-term spikes of toxic emissions. This is due

to the fact that the emission control systems do not get a chance to operate at optimal efficiency (California Air Resources Board [ARB], 2010). This spike of toxic emissions for neighboring communities would be even more pronounced when there are many backup diesel generators that are being utilized (in this case a total of 24).

Moreover, Tier 4 emission controls do not effectively filter ultrafine particles (<100nm). In fact, peer-reviewed studies have shown that the after-treatment emission control systems can paradoxically produce large spikes in ultrafine particle number and promote formation of nitro-PAHs under real operating conditions (Heeb et al., 2008). Ultrafine particles are extremely dangerous because they are so small that as soon as one takes a breath these particles penetrate very deep inside the lungs where they sit permanently and can be directly absorbed into the blood stream and cause cardiovascular, respiratory, and genotoxic adverse effects (Kwon, Ryu, & Carlsten, 2020). This is acutely concerning for neighboring communities.

Naperville Already Has Very Poor Air Quality:

It is critical to recognize that Naperville already faces considerable air quality challenges, and any new source of diesel emissions must be evaluated in the context of this already existing elevated risk. According to the American Lung Association's 2025 "State of the Air" report, Naperville is part of a metropolitan region that ranks among the 15 worst in the entire United States for year-round particulate pollution with a grade of "F" (ALA 2025).

Illinois also already bears a disproportionate burden from diesel-related air pollution. The state ranks fifth in the nation for deaths per capita linked to fine particulate matter (PM_{2.5}) from diesel engine emissions. Although Illinois residents make up only 3.8% of the U.S. population, we account for an outsized 6.3% of asthma-related emergency department visits and 5.3% of heart attacks attributed to diesel pollution (Respiratory Health Association, 2022). These statistics make clear that Illinois communities are already overexposed to harmful diesel emissions. Even small additional releases such as those from monthly testing or backup operation of the proposed data center's 24 diesel generators would further burden an airshed that is already at risk and heighten health threats to surrounding neighborhoods.

Young Children Face Even Higher Risks Due to Developing Lungs

Young children are uniquely and severely vulnerable to air pollution and diesel emissions because their lungs and immune systems are not yet fully developed. From birth through adolescence, children's lungs continue to grow and form new alveoli—tiny air sacs responsible for oxygen exchange. According to the American Academy of Pediatrics (AAP),

this developmental process continues until about age 18, with the most rapid growth occurring during the first 8 years of life (Pediatrics, Vol. 123, 2009, "Health Effects of Air Pollution on Children").

The World Health Organization emphasizes that exposure to particulate matter and toxins during this critical period can reduce lung function, and increase lifetime susceptibility to respiratory illnesses (WHO, "Review of evidence on health aspects of air pollution," 2013). Children inhale more air per pound of body weight than adults and spend more time outdoors, meaning they can absorb proportionally higher quantities of airborne pollutants (Environmental Protection Agency, "Children's Health and Air Pollution," 2019), thereby increasing lifetime risk of respiratory disease including cancer.

This is further supported by multiple studies, including research from the Children's Health Study in Southern California, which demonstrated that exposure to diesel exhaust and fine particles (PM_{2.5}) during childhood can lead to permanent deficits in lung capacity and function (Gauderman et al., New England Journal of Medicine, 2004) that raises the risk of chronic asthma, bronchitis, and even lung cancer later in life.

The risks outlined above are not theoretical - a recent paper by researchers at UC Riverside and Caltech estimated that an increase in permits for backup diesel generators at data centers in Virginia since 2023 likely has led to 14,000 asthma cases and caused as much as \$300 million in health care costs (Han, Wu, Li, Wierman, & Ren, 2024). The adverse health impacts (and resultant public health economic impacts) over time in our community will far outweigh any initial investment or recurring revenue the developer has supposedly promised.

Contradiction to Naperville's Core Values

Naperville has built its reputation on being one of the best places in America to raise a family. In 2023, Money Magazine ranked Naperville #3 on its list of "Best Places to Live in America," citing the city's exceptional public schools, abundant green spaces, robust community resources and importantly, a strong commitment to public health (Money Magazine, 2023). The City's own 2021 Comprehensive Plan envisions Naperville as "a family-oriented community dedicated to providing a safe, healthy, and nurturing environment for children and residents." Introducing a large-scale, heavy industrial facility that utilizes dozens of diesel generators immediately next to neighborhoods with hundreds of young children directly contradicts these stated values and threatens the atmosphere that continues to attract families to our city.

Cumulative Effects and Urgent Appeal

The cumulative impact of the risks outlined above is clear. A heavy industrial facility does not belong next to neighborhoods. Allowing the Karis data center to operate in such close proximity to hundreds of families with young children would exacerbate existing health risks, can increase adverse health outcomes including asthma and cancer, and would not be aligned with Naperville's commitment to creating a safe and healthy environment for families—a vision supported by our community leaders and cherished by residents.

Allowing the Karis data center would also violate one of the critical standards for conditional use which states that any recommendation by the Planning and Zoning Commission and any decision by the City Council shall be predicated on evidence and findings that "the establishment, maintenance, or operation of the conditional use will not be detrimental to, or endanger the public health, safety, and general welfare" of surrounding communities.

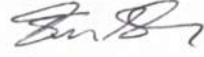
We strongly urge the Planning and Zoning Commission to sincerely consider the overwhelming evidence and protect the health and safety of Naperville families, including most importantly our young children. Please reject the Karis data center proposal.

Thank you for your thoughtful attention to this matter.

Sincerely,

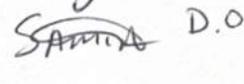
Physicians of Naper Commons

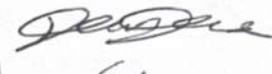
Suhail Khokhar, MD 

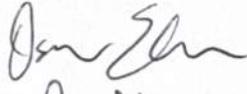
Sujay Shah, M.D. 

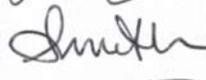
Puja Jadhav M.D. 

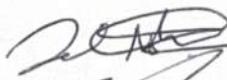
Asim K. Babar, M.D. 

Samia Qadir D.O.  D.O.

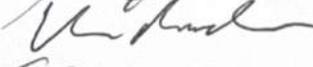
Dana Darwish MD 

Osama Elkhateb DO 

Swetha Nukala, MD 

Salman Syed, MD 

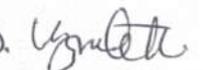
Faizan Khan MD 

Umair Randhawa, MD 

Shalin Desai, MD 

Vivek Cherian, MD 

Mohammed S. Ahmed, DO 

Uzma Kotrawala, M.D. 

Veenel Bhupathiraju MD 

Annabelle Brochnick, MD 

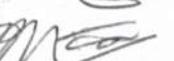
Archana Shukla, DO 

AMIR BARR, MD 

ASIM JUSUFI, MD, MPH 

Alia Jusufi 

Nadeem Mirza MD. 

NEAL MEHTA, MD 

Meena Sadaps, MD 

Maya Patel, MD 

References

American Academy of Pediatrics. (2009). *Policy statement: Ambient air pollution: Health hazards to children*. *Pediatrics*, 123(6), 1697–1704. <https://doi.org/10.1542/peds.2009-1632>

American Lung Association (ALA). (2025). *State of the Air 2025*. American Lung Association. <https://www.lung.org/research/sota>

California Air Resources Board. (2010). *Appendix B: Analysis of the Technical Feasibility and Costs of After-Treatment Controls on New Emergency Standby Engines (ATCM 2010)*. <https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2010/atcm2010/atcmappb.pdf>

U.S. Environmental Protection Agency. (2019). *Integrated Science Assessment (ISA) for Particulate Matter (EPA/600/R-19/188)*. U.S. EPA, Office of Research and Development, Washington, DC. <https://www.epa.gov/isa/integrated-science-assessment-isa-particulate-matter>

Environmental Protection Agency (EPA). (2019). *Children's health and air pollution*. U.S. Environmental Protection Agency. <https://www.epa.gov/children/childrens-health-and-air-pollution>

Gauderman, W. J., Avol, E., Gilliland, F., Vora, H., Thomas, D., Berhane, K., McConnell, R., Kuenzli, N., Lurmann, F., Rappaport, E., Margolis, H., Bates, D., & Peters, J. (2004). The effect of air pollution on lung development from 10 to 18 years of age. *New England Journal of Medicine*, 351(11), 1057–1067. <https://doi.org/10.1056/NEJMoa040610>

Han, Y., Wu, Z., Li, P., Wierman, A., & Ren, S. (2024). *The unpaid toll: Quantifying and addressing the public health impact of data centers* (arXiv preprint arXiv:2412.06288v2).

Heeb, N. V., Forss, A. M., Bach, C., Reimann, S., Herzog, A., & Jäckle, H. W. (2008). Paradoxical emissions of solid ultrafine particles from modern diesel passenger cars. *Environmental Science & Technology*, 42(15), 5664–5670. <https://doi.org/10.1021/es800240e>

International Agency for Research on Cancer (IARC). (2012). *Diesel and gasoline engine exhausts and some nitroarenes (IARC Monographs, Vol. 105)*. World Health Organization. <https://monographs.iarc.who.int/wp-content/uploads/2018/06/mono105.pdf>

Kwon, H. S., Ryu, M. H., & Carlsten, C. (2020). Ultrafine particles: Unique physicochemical properties relevant to health and disease. *Experimental & Molecular Medicine*, 52(3), 318–328. <https://doi.org/10.1038/s12276-020-0405-1>

Money Magazine. (2023). *Best places to live in America 2023*. <https://money.com/collection/best-places-to-live-2023/>

Respiratory Health Association. (2022). *The Dirty Dozen: The impact of diesel engine pollution in Illinois*. Respiratory Health Association of Metropolitan Chicago. <https://resphealth.org/wp-content/uploads/2022/05/Dirty-Dozen-Impact-of-Diesel-Engine-Pollution-in-Illinois.pdf>

World Health Organization (WHO). (2013). *Review of evidence on health aspects of air pollution – REVIHAAP Project: Technical report*. World Health Organization Regional Office for Europe. https://www.euro.who.int/__data/assets/pdf_file/0004/193108/REVIHAAP-Final-technical-report.pdf

From: City of Naperville Citizen Support [REDACTED]
Sent: Monday, November 3, 2025 7:50 AM
To: Pruneda, Rachel <[REDACTED]>
Subject: Citizen Question Submissions for Mayor/Council (GovQA Reference # W300724-110325)

Citizen Support Center (GovQA) Mayor/Council Submission

You are receiving this email to alert you that a new Mayor/Council submission has been created and assigned to you.

Contact Name: Dr Agim Jusufi MD, MPH

Customer Name:

Email: [REDACTED]@gov

Phone: [Phone]

Reference Number: W300724-110325

Create Date: 11/3/2025 7:49:11 AM

Status: New Request

Request Type: Question/Concern

Description: Dr Agim Jusufi MD, MPH
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Dear Mayor Wehrli and Members of the City Council,
I am writing as a physician (MD, MPH) and concerned resident of Naperville to express grave concerns about the proposed data center development at Naper Commons. As a public health professional, I have reviewed similar projects in Aurora, IL, and Virginia, where residents report significant adverse impacts—issues we risk importing into our community.

Key Public Health and Community Risks:

1. Diesel Generator Exhaust (Group 1 Carcinogen) The plan includes 24 backup diesel generators requiring monthly testing. Per the World Health Organization and International Agency for Research on Cancer (IARC), diesel exhaust is classified as a Group 1 carcinogen—the same category as tobacco smoke and asbestos. Prolonged exposure increases risks of lung cancer, asthma, and cardiovascular disease, especially in children and vulnerable populations.
2. Noise Pollution and Quality of Life Monthly multi-day generator testing will generate sustained industrial noise, disrupting sleep, concentration, and the peaceful enjoyment of Naper Commons Park and nearby homes. Chronic noise exposure is linked to hypertension, anxiety, and diminished cognitive development in children.
3. Energy Grid Strain and Property Values High-energy-demand facilities like this strain local infrastructure and may lead to unreliable power or higher utility costs. Adjacent industrial zoning could depress residential property values, limiting homeowners' ability to recoup investments.
4. Lack of School District Benefit The development reportedly generates tax revenue without supporting Naperville schools—an inequitable burden on families who rely on strong local education funding.

Request for Action:

I urge the Council to:

- Pause approval pending an independent Health Impact Assessment (HIA) and noise modeling study.

- Require zero-emission backup power (e.g., battery storage or fuel cells) if the project proceeds.
- Mandate real-time air quality monitoring and public reporting near residential areas.
- Engage affected homeowners in meaningful dialogue before final decisions.

Our children's health, our park's tranquility, and our neighborhood's future are not worth gambling on. I am available to discuss these concerns or provide peer-reviewed studies at your convenience.

Thank you for your leadership and commitment to Naperville's families.

Sincerely,
Agim Jusufi, MD, MPH Physician & Public Health Advocate
Naperville Resident

Click the link below to review and/or respond to the submission.



Kopinski, Sara

From: Iwicki, Brad
Sent: Wednesday, November 5, 2025 11:00 AM
To: Kopinski, Sara
Subject: FW: Data Centers in Suburbs

Follow Up Flag: Follow up
Flag Status: Flagged

POD - Data Center public comment

Brad Iwicki
Assistant Planner | Planning & Development – TED Business Group City of Naperville | 400 S. Eagle St. Naperville, IL 60540
(630) 305-7021 | iwickib@naperville.il.us

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-----Original Message-----

From: [REDACTED]
Sent: Wednesday, November 5, 2025 10:56 AM
To: Planning <Planning@naperville.il.us>
Subject: Data Centers in Suburbs

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I rarely feel the need to speak out because Naperville officials overall do a great job of managing the City, but here we are - a suburban City strongly considering a Data Center.

Yes, the developers state that there won't be the same electric and water issues that cities with Data Centers complain about - higher utility prices borne by the residents; and equally troubling, electrical brown-outs. Brown outs can be dangerous at worst and shorten the lives of electronics at best.

If Naperville officials truly believe the claims of the data center developer, that those issues won't happen at "this" Data Center, and goes through with the plan, then all revenue generated by this Data Center property should not go into a general fund, but instead should be directly and fully credited to every Naperville Resident's City utility bill. This is fair as it will off-set any future increased utility costs and electronic replacement costs caused by the very nature of the Data Center.

Hopefully the City will ultimately agree that Data Centers do not belong in the Suburbs. But if they do allow it then at least the residents receive restitution.

Best Regards,
Kimberley Wuensch, Naperville Resident.

Kopinski, Sara

From: Egner, Therese
Sent: Thursday, November 6, 2025 8:34 AM
To: Kopinski, Sara
Subject: FW: 1960 Lucent Lane DEV-0057-2025

FYI- DEV-0057-2025

Therese Egner

Community Planner | Planning & Development - TED Business Group
City of Naperville | 400 S. Eagle St. Naperville, IL 60540
(630) 420-4179 | egnert@naperville.il.us

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From: Kally McConnell [REDACTED]
Sent: Wednesday, November 5, 2025 6:38 PM
To: Planning <Planning@naperville.il.us>
Subject: 1960 Lucent Lane DEV-0057-2025

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Hello!

I can not make it to the meeting tonight to speak as I had hoped. Here are my prepared remarks:

My name is Kally McConnell. I am from the Park Addition of Naperville. I am concerned that we don't have enough of an enforceable guarantee to protect both the neighborhood and the nature preserves nearby from the environmental strain that can come from a project like this.

While I understand that promises have been made by Karis, my husband is in technology and has worked on projects such as these. They optimize to get projects like this done quickly so that they can start making money as soon as possible. They aren't optimizing for the health of the building's neighbors.

I don't feel confident in or understand how the promises made will be actually enforced.

I do understand that it is the role of government to protect the citizens from corporate interests. Corporations want to maximize profit. The data center business is booming and by the nature of capitalism, they are going to try to build these as quickly as possible without the future of the people who live nearby in mind; profits will be in mind.

I ask that Naperville, all of you, take care with this decision, set a precedent, and require that if we are building data centers in our town, that our residents and our forest preserves be protected with clean energy or something else that people smarter than me can come up with.

You, our government, are the only thing protecting our community from the potential negative outcomes of this decision.

Thank you so much for your time!

Kally McConnell

████████████████████

--

Kally McConnell

She/her

Kopinski, Sara

From: Egner, Therese
Sent: Thursday, November 6, 2025 8:33 AM
To: Kopinski, Sara
Subject: FW: Public hearing for DEV-0057-2025 Karis Critical Member, LLC

FYI- DEV-0057-2025

Therese Egner
Community Planner | Planning & Development - TED Business Group City of Naperville | 400 S. Eagle St. Naperville, IL 60540
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-----Original Message-----

From: Richard Stahler [REDACTED]
Sent: Wednesday, November 5, 2025 4:48 PM
To: Planning <Planning@naperville.il.us>
Subject: Public hearing for DEV-0057-2025 Karis Critical Member, LLC

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Having resided for 65 years next to the Nokia property beginning when it was Mr. Barkei's farm, we were approached by Bell Laboratory's representative to seek our approval of their purchase of the property with the declaration that Bell would not proceed with the purchase if any adjacent homeowner did not approve.

Surely there is still some essence of that same regard for others that outweighs profit and money as the overriding factor in one's actions.

I do not believe that datacenters should be built adjacent to our homes, please vote no.

Best regards,

Richard Stahler

[REDACTED]

[REDACTED]

Kopinski, Sara

From: Egner, Therese
Sent: Wednesday, November 5, 2025 4:33 PM
To: Kopinski, Sara
Subject: FW: Proposed data center opposition

FYI- DEV-0057-2025

Therese Egner

Community Planner | Planning & Development - TED Business Group
City of Naperville | 400 S. Eagle St. Naperville, IL 60540
(630) 420-4179 | egnert@naperville.il.us

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From: Kate <[REDACTED]>
Sent: Wednesday, November 5, 2025 4:28 PM
To: Planning <Planning@naperville.il.us>; [REDACTED] Wilson, Nate [REDACTED] White, Benny <[REDACTED]> Syed, Ashfaq <[REDACTED]> McBroom, Josh <[REDACTED]> Jain, Supna [REDACTED]; Holzhauer, Ian [REDACTED] Gibson, Mary [REDACTED]; Kelly, Patrick <[REDACTED]>
Subject: Proposed data center opposition

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Dear Planning and Zoning Committee and City Council members,

I oppose any data centers in Naperville. I urge the committee and city council to pause any votes on the proposed data center. I have serious concerns about how a data center will impact electricity and water usage. Our electric and water bills are currently outrageously high. The city is currently under stress with our energy needs and adding additional strain is not a wise choice.

An article from the Smithsonian reported on the impact data centers have on our environment and resources. The article states that data centers disrupt the electric grid infrastructure and increase greenhouse gas emissions. The cooling systems will put a strain on our water resources. From what I read, the land parcel is on an aquifer as well. The Alliance Great Lakes organization raises serious concerns for our finite water resource.

There is also the air and noise pollution to consider

I do not believe that our local and state governments are fully prepared for the long term impact data centers will have on our resources.

My hope is long term planning for residents will be a priority over a data center.

Thank you for reading.

Sincerely,
Katherine Schleyer


Naperville, IL 60564

<https://www.smithsonianmag.com/science-nature/with-ai-on-the-rise-what-will-be-the-environmental-impacts-of-data-centers-180987379/>

<https://greatlakes.org/2025/08/great-lakes-region-unprepared-for-increasing-water-use-demands/>

Kopinski, Sara

From: Egner, Therese
Sent: Wednesday, November 5, 2025 4:33 PM
To: Kopinski, Sara
Subject: FW: KARIS DATA CENTER

FYI- DEV-0057-2025

Therese Egner

Community Planner | Planning & Development - TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

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From: Jane Brueggemann <[REDACTED]>
Sent: Wednesday, November 5, 2025 4:14 PM
To: Planning <Planning@naperville.il.us>
Subject: KARIS DATA CENTER

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Dear Naperville Planning and Zoning Committee:

Please do not approve the proposal for the Karis Critical Data Center. There are too many unanswered questions; and the results of environment and other community concerns will be felt for decades. **No amount of “conditions” can fully mitigate the risks. Once built, the impacts of the data center will be permanent and irreversible. I urge the City of Naperville Planning**

and Zoning Commission to deny this development in its entirety to protect the health, safety, and quality of life of its residents.

I know that the “NIMBY” acronym can applied to those in opposition. In this case, a dangerous unknown is proposed for our LITERAL BACK YARDS.

You may recall the horrible health effects experienced decades ago from the Naperville AMOCO chemical research facility. Several employees died of a rare brain cancer. AMOCO quietly settled with their families for untold millions, but couldn't bring those lives back. If a Planning and Zoning Commission had had the opportunity to prevent such tragedies, I hope that it would have.

Please take this opportunity to prevent would surely be unwanted results.

Thank you for consideration.

Jane Brueggemann

████████████████████

Naperville

Kopinski, Sara

From: Egner, Therese
Sent: Wednesday, November 5, 2025 4:32 PM
To: Kopinski, Sara
Subject: FW: KARIS CRITICAL DEV-0057-2025

FYI- DEV-0057-2025

Therese Egner
Community Planner | Planning & Development - TED Business Group City of Naperville | 400 S. Eagle St. Naperville, IL 60540
(630) 420-4179 | egnert@naperville.il.us

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-----Original Message-----

From: riki I kauffman [REDACTED]
Sent: Wednesday, November 5, 2025 2:26 PM
To: Planning <Planning@naperville.il.us>
Subject: KARIS CRITICAL DEV-0057-2025

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Dear Planning and Zoning Commission Members,

My husband and I have been Naperville residents since 1951.
We are familiar with all of the changes that have occurred in our community, some good and some bad.

We ask that your decision be to not recommend the Karis Critical Data Center to the Naperville City Council.

We don't believe that the millions of dollars proposed by Karis Critical are comparable to their greed for our water and electricity. The damages caused by the operation of this center will contribute immensely to light, sound and air pollution against humans, wildlife and our planet.

Why do we want to destroy the quality of our environment by succumbing to the offerings of these billionaires. Is it worth it?

We don't think so.

Please say "No" to Karis Critical and protect all of us.

Thank you for reading this email.

Sincerely,
Robert Koelling
Riki Kauffman

Kopinski, Sara

From: Egner, Therese
Sent: Thursday, November 6, 2025 8:34 AM
To: Kopinski, Sara
Subject: FW: Letter from Physicians Opposing the Proposed Karis Data Center
Attachments: Letter to the Naperville Planning and Zoning Commission.pdf

FYI- DEV-0057-2025

Therese Egner

Community Planner | Planning & Development - TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 420-4179 | egnert@naperville.il.us

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From: Sujay Shah [REDACTED]
Sent: Wednesday, November 5, 2025 6:17 PM
To: Planning <Planning@naperville.il.us>
Subject: Letter from Physicians Opposing the Proposed Karis Data Center

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Dear Members of the Planning and Zoning Commission,

My name is Sujay Shah and I am a physician in the Naper Commons neighborhood, which is directly adjacent to the proposed Karis Data Center. As a medical oncologist, I have significant concerns regarding the numerous health impacts on surrounding communities, especially for young children with this proposal. These concerns are also shared by a number of physicians. Please find attached a letter from 25 physicians in our community that outlines the health risks supported by objective data and references. We strongly urge the commission to reject the Karis data center proposal to ensure the health and safety of our children, our families, and our future.

Sincerely,
Sujoy Shah, M.D.

To the Naperville Planning and Zoning Commission

November 5th, 2025

Naperville Planning and Zoning Commission

400 S. Eagle Street

Naperville, IL 60540

Dear Members of the Planning and Zoning Commission,

Introduction: Community Concerns and Multiple Risks

We are writing as deeply concerned residents and physicians of Naperville to express our strong opposition to the proposed Karis data center. While this proposal is presented by the developer as a high-tech economic opportunity, it carries very real and well-documented public health risks that fall disproportionately on nearby neighborhoods including most critically, families with young children.

Although the developer has altered their original request to currently focus on Phase 1, the fundamental risks and concerns for surrounding communities (with many homes just hundreds of feet from the facility) remain significant. The possibility of future expansion poses an additional risk.

Locating a large heavy industrial data center immediately adjacent to residential neighborhoods brings multiple risks:

- Hazardous emissions, with the use of dozens of diesel generators, that can have substantial adverse health impacts.
- Increased noise pollution - in particular, constant low frequency noise which has reportedly been associated with migraines and sleep disturbances for members of communities that neighbor data centers.
- Adverse upstream environmental impacts due to massive and constant energy requirements. This is especially concerning considering that approximately 80% of Naperville's energy comes from dirty coal plants, meaning the environmental impacts likely will extend beyond the immediate surrounding communities.
- Potential for further long-term industrial expansion which would exacerbate all the risks above even more.

Combined, these factors threaten the health, safety, and overall quality of life for the neighboring communities. As research and community experience have repeatedly shown, industrial developments of this scale are not compatible with the needs of neighborhoods

focused on raising families and protecting children. The multitude of risks above collectively should raise substantial concerns for the Planning and Zoning Commission.

As physicians residing in the neighboring Naper Commons community, we take this opportunity with supporting data to specifically focus on and further detail the significant adverse health impacts that can occur due to the proposed data center for surrounding communities, particularly for young children.

Diesel Exhaust: A Persistent Hazard for Cancer and Respiratory Diseases

Diesel exhaust is a complex mix of fine particulate matter (PM_{2.5}), ultrafine particles (<100nm), nitrogen oxides (NOx), and more than 40 toxic organic compounds (including benzene and formaldehyde). The World Health Organization has classified diesel exhaust as a Group 1 human carcinogen way back in 2012 – this is the same category as tobacco and asbestos (IARC 2012). U.S. public-health agencies note that diesel exhaust and PM_{2.5} cause adverse cardiopulmonary and carcinogenic risks even at low exposures; regulatory assessments therefore treat such emissions as posing measurable health risk even at ambient concentrations (U.S. Environmental Protection Agency [EPA], 2019). Essentially this means that every time humans are exposed to any amount of diesel emissions the risk of adverse health outcomes such as cancer goes up. The table below outlines the short-term and long-term health risks of exposure to toxic components from diesel exhaust:

Pollutant	Short-Term Effects	Long-Term Risks
NOx	Airway inflammation, asthma exacerbation	Chronic bronchitis, reduced lung growth in children
PM_{2.5} / Ultra Fine Particles	Irritation, headaches, sleep disturbance	Heart disease, cancer, developmental toxicity

Tier 4 Diesel Generators Still Emit Carcinogens and Should Not Be Placed Next to Neighborhoods

The developer has stated that they will utilize Tier 4 backup diesel generators, which utilize the most advanced emission control systems available on the market. However, this is not a sufficient mitigation when you have multiple surrounding neighborhoods with young children. It is important to remember that Tier 4 diesel generators do not eliminate PM_{2.5} and NOx emissions and in fact with real world use during startup or idle/low load situations with short runs, there can be substantial short-term spikes of toxic emissions. This is due

to the fact that the emission control systems do not get a chance to operate at optimal efficiency (California Air Resources Board [ARB], 2010). This spike of toxic emissions for neighboring communities would be even more pronounced when there are many backup diesel generators that are being utilized (in this case a total of 24).

Moreover, Tier 4 emission controls do not effectively filter ultrafine particles (<100nm). In fact, peer-reviewed studies have shown that the after-treatment emission control systems can paradoxically produce large spikes in ultrafine particle number and promote formation of nitro-PAHs under real operating conditions (Heeb et al., 2008). Ultrafine particles are extremely dangerous because they are so small that as soon as one takes a breath these particles penetrate very deep inside the lungs where they sit permanently and can be directly absorbed into the blood stream and cause cardiovascular, respiratory, and genotoxic adverse effects (Kwon, Ryu, & Carlsten, 2020). This is acutely concerning for neighboring communities.

Naperville Already Has Very Poor Air Quality:

It is critical to recognize that Naperville already faces considerable air quality challenges, and any new source of diesel emissions must be evaluated in the context of this already existing elevated risk. According to the American Lung Association's 2025 "State of the Air" report, Naperville is part of a metropolitan region that ranks among the 15 worst in the entire United States for year-round particulate pollution with a grade of "F" (ALA 2025).

Illinois also already bears a disproportionate burden from diesel-related air pollution. The state ranks fifth in the nation for deaths per capita linked to fine particulate matter (PM_{2.5}) from diesel engine emissions. Although Illinois residents make up only 3.8% of the U.S. population, we account for an outsized 6.3% of asthma-related emergency department visits and 5.3% of heart attacks attributed to diesel pollution (Respiratory Health Association, 2022). These statistics make clear that Illinois communities are already overexposed to harmful diesel emissions. Even small additional releases such as those from monthly testing or backup operation of the proposed data center's 24 diesel generators would further burden an airshed that is already at risk and heighten health threats to surrounding neighborhoods.

Young Children Face Even Higher Risks Due to Developing Lungs

Young children are uniquely and severely vulnerable to air pollution and diesel emissions because their lungs and immune systems are not yet fully developed. From birth through adolescence, children's lungs continue to grow and form new alveoli—tiny air sacs responsible for oxygen exchange. According to the American Academy of Pediatrics (AAP),

this developmental process continues until about age 18, with the most rapid growth occurring during the first 8 years of life (Pediatrics, Vol. 123, 2009, "Health Effects of Air Pollution on Children").

The World Health Organization emphasizes that exposure to particulate matter and toxins during this critical period can reduce lung function, and increase lifetime susceptibility to respiratory illnesses (WHO, "Review of evidence on health aspects of air pollution," 2013). Children inhale more air per pound of body weight than adults and spend more time outdoors, meaning they can absorb proportionally higher quantities of airborne pollutants (Environmental Protection Agency, "Children's Health and Air Pollution," 2019), thereby increasing lifetime risk of respiratory disease including cancer.

This is further supported by multiple studies, including research from the Children's Health Study in Southern California, which demonstrated that exposure to diesel exhaust and fine particles (PM_{2.5}) during childhood can lead to permanent deficits in lung capacity and function (Gauderman et al., New England Journal of Medicine, 2004) that raises the risk of chronic asthma, bronchitis, and even lung cancer later in life.

The risks outlined above are not theoretical - a recent paper by researchers at UC Riverside and Caltech estimated that an increase in permits for backup diesel generators at data centers in Virginia since 2023 likely has led to 14,000 asthma cases and caused as much as \$300 million in health care costs (Han, Wu, Li, Wierman, & Ren, 2024). The adverse health impacts (and resultant public health economic impacts) over time in our community will far outweigh any initial investment or recurring revenue the developer has supposedly promised.

Contradiction to Naperville's Core Values

Naperville has built its reputation on being one of the best places in America to raise a family. In 2023, Money Magazine ranked Naperville #3 on its list of "Best Places to Live in America," citing the city's exceptional public schools, abundant green spaces, robust community resources and importantly, a strong commitment to public health (Money Magazine, 2023). The City's own 2021 Comprehensive Plan envisions Naperville as "a family-oriented community dedicated to providing a safe, healthy, and nurturing environment for children and residents." Introducing a large-scale, heavy industrial facility that utilizes dozens of diesel generators immediately next to neighborhoods with hundreds of young children directly contradicts these stated values and threatens the atmosphere that continues to attract families to our city.

Cumulative Effects and Urgent Appeal

The cumulative impact of the risks outlined above is clear. A heavy industrial facility does not belong next to neighborhoods. Allowing the Karis data center to operate in such close proximity to hundreds of families with young children would exacerbate existing health risks, can increase adverse health outcomes including asthma and cancer, and would not be aligned with Naperville's commitment to creating a safe and healthy environment for families—a vision supported by our community leaders and cherished by residents.

Allowing the Karis data center would also violate one of the critical standards for conditional use which states that any recommendation by the Planning and Zoning Commission and any decision by the City Council shall be predicated on evidence and findings that "the establishment, maintenance, or operation of the conditional use will not be detrimental to, or endanger the public health, safety, and general welfare" of surrounding communities.

We strongly urge the Planning and Zoning Commission to sincerely consider the overwhelming evidence and protect the health and safety of Naperville families, including most importantly our young children. Please reject the Karis data center proposal.

Thank you for your thoughtful attention to this matter.

Sincerely,

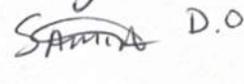
Physicians of Naper Commons

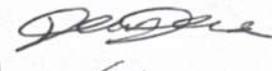
Suhail Khokhar, MD 

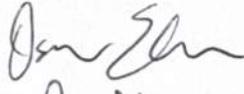
Sujay Shah, M.D. 

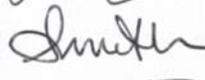
Puja Jadhav M.D. 

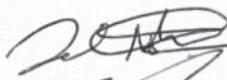
Asim K. Babar, M.D. 

Samia Qadir D.O.  D.O.

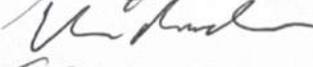
Dana Darwish MD 

Osama Elkhateb DO 

Swetha Nukala, MD 

Salman Syed, MD 

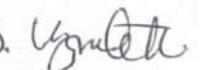
Faizan Khan MD 

Umair Randhawa, MD 

Shalin Desai, MD 

Vivek Cherian, MD 

Mohammed S. Ahmed, DO 

Uzma Kotrawala, M.D. 

Veenel Bhupathiraju MD 

Annabelle Brochnick, MD 

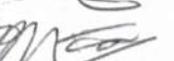
Archana Shukla, DO 

AMIR BARR, MD 

ASIM JUSUFI, MD, MPH 

Alia Jusufi 

Nadeem Mirza MD. 

NEAL MEHTA, MD 

Meena Sadaps, MD 

Maya Patel, MD 

References

American Academy of Pediatrics. (2009). *Policy statement: Ambient air pollution: Health hazards to children*. *Pediatrics*, 123(6), 1697–1704. <https://doi.org/10.1542/peds.2009-1632>

American Lung Association (ALA). (2025). *State of the Air 2025*. American Lung Association. <https://www.lung.org/research/sota>

California Air Resources Board. (2010). *Appendix B: Analysis of the Technical Feasibility and Costs of After-Treatment Controls on New Emergency Standby Engines (ATCM 2010)*. <https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2010/atcm2010/atcmappb.pdf>

U.S. Environmental Protection Agency. (2019). *Integrated Science Assessment (ISA) for Particulate Matter (EPA/600/R-19/188)*. U.S. EPA, Office of Research and Development, Washington, DC. <https://www.epa.gov/isa/integrated-science-assessment-isa-particulate-matter>

Environmental Protection Agency (EPA). (2019). *Children's health and air pollution*. U.S. Environmental Protection Agency. <https://www.epa.gov/children/childrens-health-and-air-pollution>

Gauderman, W. J., Avol, E., Gilliland, F., Vora, H., Thomas, D., Berhane, K., McConnell, R., Kuenzli, N., Lurmann, F., Rappaport, E., Margolis, H., Bates, D., & Peters, J. (2004). The effect of air pollution on lung development from 10 to 18 years of age. *New England Journal of Medicine*, 351(11), 1057–1067. <https://doi.org/10.1056/NEJMoa040610>

Han, Y., Wu, Z., Li, P., Wierman, A., & Ren, S. (2024). *The unpaid toll: Quantifying and addressing the public health impact of data centers* (arXiv preprint arXiv:2412.06288v2).

Heeb, N. V., Forss, A. M., Bach, C., Reimann, S., Herzog, A., & Jäckle, H. W. (2008). Paradoxical emissions of solid ultrafine particles from modern diesel passenger cars. *Environmental Science & Technology*, 42(15), 5664–5670. <https://doi.org/10.1021/es800240e>

International Agency for Research on Cancer (IARC). (2012). *Diesel and gasoline engine exhausts and some nitroarenes (IARC Monographs, Vol. 105)*. World Health Organization. <https://monographs.iarc.who.int/wp-content/uploads/2018/06/mono105.pdf>

Kwon, H. S., Ryu, M. H., & Carlsten, C. (2020). Ultrafine particles: Unique physicochemical properties relevant to health and disease. *Experimental & Molecular Medicine*, 52(3), 318–328. <https://doi.org/10.1038/s12276-020-0405-1>

Money Magazine. (2023). *Best places to live in America 2023*. <https://money.com/collection/best-places-to-live-2023/>

Respiratory Health Association. (2022). *The Dirty Dozen: The impact of diesel engine pollution in Illinois*. Respiratory Health Association of Metropolitan Chicago. <https://resphealth.org/wp-content/uploads/2022/05/Dirty-Dozen-Impact-of-Diesel-Engine-Pollution-in-Illinois.pdf>

World Health Organization (WHO). (2013). *Review of evidence on health aspects of air pollution – REVIHAAP Project: Technical report*. World Health Organization Regional Office for Europe. https://www.euro.who.int/__data/assets/pdf_file/0004/193108/REVIHAAP-Final-technical-report.pdf

Kopinski, Sara

From: City of Naperville Citizen Support [REDACTED]
Sent: Thursday, November 6, 2025 2:23 PM
To: Kopinski, Sara
Subject: Citizen Question Submissions for Mayor/Council (GovQA Reference # W301190-110625)

Follow Up Flag: Follow up
Flag Status: Flagged

Citizen Support Center (GovQA) Mayor/Council Submission

You are receiving this email to alert you that a new Mayor/Council submission has been created and assigned to you.

Contact Name: Ashley Schlechte

Customer Name:

Email: [REDACTED]

Phone: [Phone]

Reference Number: W301190-110625

Create Date: 11/6/2025 1:20:09 PM

Status: Assigned

Request Type: Question/Concern

Description:

As a resident of Naperville, I am strongly opposed to the proposed Karis data center. The project poses serious environmental and community concerns, including high energy consumption, increased greenhouse gas emissions, excessive water use, and potential noise, traffic, and light pollution that would disrupt our neighborhood.

While temporary construction jobs may be created, the long-term benefits to the community are minimal, and the environmental and social costs could be substantial. I urge you to prioritize the well-being of residents, protect local resources, and reconsider approval of this project.

I am most concerned about utility prices climbing. Do you have absolute certainty that this will not impact our utility infrastructure? Karis' goal is to profit. Your goal should be to protect Naperville. Building this data center is all gain for them, while we take on all the risk.

Click the link below to review and/or respond to the submission.



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Kopinski, Sara

From: Egner, Therese
Sent: Thursday, November 6, 2025 3:38 PM
To: Kopinski, Sara
Subject: FW: Request to Deny Proposed Karis Data Center Case DEV-0057-2025

FYI – DEV-0057-2025

Therese Egner

Community Planner | Planning & Development - TED Business Group
City of Naperville | 400 S. Eagle St. Naperville, IL 60540
(630) 420-4179 | egnert@naperville.il.us

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From: Steve Jarvis [REDACTED]
Sent: Thursday, November 6, 2025 3:32 PM
To: Wehrli, Scott [REDACTED] Holzhauser, Ian [REDACTED] Longenbaugh, Allison [REDACTED] Syed, Ashfaq <[REDACTED]> Wilson, Nate <[REDACTED]> Gibson, Mary [REDACTED] Kelly, Patrick [REDACTED] McBroom, Josh [REDACTED] White, Benny <[REDACTED]>; Planning <Planning@naperville.il.us>
Subject: Request to Deny Proposed Karis Data Center Case DEV-0057-2025

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Dear Mayor Wherli and Members of the Naperville City Council,

As a lifelong resident of Naperville, I am writing to sincerely urge you to deny the proposed Karis Data Center (Case DEV-0057-2025) at Warrenville and Naperville Roads.

After growing up here and graduating from Naperville Central High School in 2002, I spent several years living throughout the Chicagoland area. In 2022, my family and I were fortunate enough to move back and build our home in Naper Commons, a new neighborhood that truly reflects what makes Naperville so special: safety, connection, and community. We came back because Naperville has always been one of the best places in the country to raise a family, and we believed that future development would continue to uphold that same promise.

Naper Commons is a vibrant, family-oriented community filled with residents who have invested deeply in Naperville's future. Many of our homes are valued at over \$700,000, and since moving in, we've already seen our home equity grow, reflecting both the city's reputation and the shared confidence we all have in this community. We chose to build here because we trusted that Naperville's thoughtful planning and leadership would protect our neighborhoods and maintain the quality of life that defines this city.

Our neighborhood is alive with families walking their dogs, children riding bikes and scooters, and parents gathering at the Naperville Park District's Naper Commons Park. It is safe, peaceful, and full of life, the very essence of what Naperville stands for.

The proposed data center, with its 24 diesel backup generators, would fundamentally alter that. It is not compatible with a residential neighborhood. As Dr. Sujay Shah shared during the November 5th Planning and Zoning Commission meeting, data centers pose serious health risks, including respiratory issues and potential long-term illnesses like cancer. I urge you to review his [testimony](#) at the 31 minute mark. No family should have to question whether the air their children breathe is safe.

My wife and I are raising our four-and-a-half-year-old son here. He loves playing outside, exploring nature, and spending time with friends at the nearby park. We chose Naperville so he could grow up in a

place known for clean air, safety, and strong community values. The idea that an industrial-scale facility could sit next to our neighborhood threatens all of that, not just for our family, but for every family who moved here with the same hopes.

Once a project like this is approved and built, its impact cannot be undone. The constant noise, diesel emissions, and bright lights will forever change the character and livability of our community.

I ask you to consider this from the perspective of the families you represent:

Would you want this built next to your home?

Would you feel comfortable with your children playing near 24 diesel generators?

Naperville has always been a city that listens to its residents, a city that values people and families first. I respectfully ask you to uphold those values and protect what makes our city so special. Please, deny this proposal, not out of opposition, but out of care and responsibility to the residents who have invested their hearts, homes, and futures here.

Thank you for taking your time to read my concern. If you have any comments or questions, please reach out.

Sincerely,

Steve Jarvis

████████████████████

██████████

Request for Redaction: Should this email be included in a **public agenda packet** or distributed externally, I respectfully ask that my **contact information** listed below be **redacted** to protect my privacy.

--

Kopinski, Sara

From: Egner, Therese
Sent: Thursday, November 6, 2025 3:42 PM
To: Kopinski, Sara
Subject: FW: DEV-0057-2025 Karis Critical Data Centers PZC File 25-1103C

FYI – DEV-0057-2025

Therese Egner

Community Planner | Planning & Development - TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 420-4179 | egnert@naperville.il.us

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From: LM D [REDACTED]
Sent: Thursday, November 6, 2025 3:40 PM
To: Planning <Planning@naperville.il.us>
Subject: DEV-0057-2025 Karis Critical Data Centers PZC File 25-1103C

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Good afternoon,

As you proceed with your decision regarding the data center proposal, please do not dismiss the overwhelming unanimous opposition to this project.

If you are the sole advocate for the data center, who is paid immensely to promote it, how do you defend it? You start by saying that everyone else is misinformed. Please do not be fooled. If anything, be offended.

Many of those in opposition are Naperville's physicians, engineers, and attorneys, among other professionals. The speakers have collectively dedicated hundreds of hours to researching this **exact** data center using the petitioner's own materials, in addition to public records, with no financial incentive or motive to uncover anything other than the truth. Here are some of the uncontested facts:

1. Data centers emit a constant, audible operating sound. Hence, the sound study.
2. The data center will house diesel generators which are routinely operated for testing.
3. Diesel exhaust is classified as a Group 1 human carcinogen (the same class as asbestos) by the World Health Organization.
4. The proposed data center is within 700 feet of a new residential community - Naper Commons.
5. The proposed lot was earmarked for future residential development within the city's master plan at the time the 200+ homes were purchased. The master plan still reflects future residential development for this lot.
6. Notice and "outreach" of the proposed data center was conducted after completion of the Naper Commons community in 2025.

Those are all facts. I ask you to draw your own conclusions.

Thank you for your thoughtful consideration.

Laurie Johnson
Naperville Resident

Kopinski, Sara

From: Egner, Therese
Sent: Friday, November 7, 2025 8:11 AM
To: Kopinski, Sara
Subject: FW: No Data Center, I'm against any proposal

FYI – DEV-0057-2025

Therese Egner

Community Planner | Planning & Development - TED Business Group
City of Naperville | 400 S. Eagle St. Naperville, IL 60540
(630) 420-4179 | egnert@naperville.il.us

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From: Natalie Ramos <[REDACTED]>
Sent: Thursday, November 6, 2025 9:29 PM
To: Planning <Planning@naperville.il.us>; Wilson, Nate <[REDACTED]>; ehrl, Scott
[REDACTED] White, Benny <[REDACTED]>; Syed, Ashfaq <[REDACTED]>; McBroom,
Josh <[REDACTED]>; Jain, Supna <[REDACTED]>; Holzhauer, Ian
[REDACTED] Gibson, Mary <[REDACTED]>; Kelly, Patrick <[REDACTED]>
Subject: No Data Center, I'm against any proposal

You don't often get email from [REDACTED]. [Learn why this is important](#)

CAUTION: This e-mail originated outside of the City of Naperville (@naperville.il.us).

DO NOT click links or open attachments unless you confirm the incoming address of the sender and know the content is safe.

Hello,

I'm a Naperville resident and I do not support a data center in our community. This would put a great danger to our environment and cause major pollution, which could cause cancer and a multitude of health and autoimmune diseases. My spouse works right by the proposed land and I would worry about his health and safety.

Please protect our community and the future for our children.

Thank you,
Natalie Ramos



Kopinski, Sara

From: City of Naperville Citizen Support [REDACTED]
Sent: Monday, November 10, 2025 4:56 PM
To: Kopinski, Sara
Subject: Citizen Question Submissions for Mayor/Council (GovQA Reference # W300911-110425)

Citizen Support Center (GovQA) Mayor/Council Submission

You are receiving this email to alert you that a new Mayor/Council submission has been created and assigned to you.

Contact Name: Kimberley Wuensch

Customer Name: Kimberley Wuensch

Email: [REDACTED]

Phone: [Phone]

Reference Number: W300911-110425

Create Date: 11/4/2025 11:31:22 AM

Status: Assigned

Request Type: Feedback

Description: Data Centers are not for Suburbs -

I rarely feel the need to speak out because Naperville overall does a great job of managing the City, but here we are - a suburban City strongly considering a Data Center.

Yes, the developers states that there won't be the same electric and water issues that cities with Data Centers complain about - higher utility prices borne by the residents, and equally troubling, electrical brown-outs.

Brown outs can be dangerous at worst and shorten the lives of electronics at best.

If Naperville truly believes the claims of the data center developer, that these issues won't happen at "this" data center, and goes through with the plan, then all revenue generated by this property should not go into a general fund, but instead should be directly credited to every Napervillian's City utility bill.

This will off-set increased utility costs and appliance replacements caused by the very nature of the Data Center.

However, hopefully the City will ultimately agree that Data Centers do not belong in the Suburbs. But if they go through with it, then at least the residents receive restitution.

Respectfully, Kimberley Wuensch, Naperville Resident.

Click the link below to review and/or respond to the submission.



This is an auto-generated e-mail and has originated from an unmonitored email account. Please DO NOT REPLY.

Kopinski, Sara

From: Egner, Therese
Sent: Thursday, November 13, 2025 9:20 AM
To: Kopinski, Sara
Subject: FW: Public Input for the November 19 PZC Hearing for Karis Critical Data Centers (DEV-0057-2025)

FYI

Therese Egner

Community Planner | Planning & Development - TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 420-4179 | egnert@naperville.il.us

The City's online Civic Access portal is now live! Please use the following link to submit and manage your development cases: <https://napervilleil-energovweb.tylerhost.net/apps/SelfService#/home> All development invoices are now sent through the Civic Access portal. If you have any questions regarding your invoice, please contact your project manager.

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From: Marilyn L Schweitzer [REDACTED]
Sent: Wednesday, November 12, 2025 4:58 PM
To: Planning <Planning@naperville.il.us>
Cc: Wehrli, Scott <[REDACTED]> Holzhauser, Ian <[REDACTED]> White, Benny [REDACTED]; Kelly, Patrick [REDACTED]; Syed, Ashfaq [REDACTED]; McBroom, Josh [REDACTED]; Wilson, Nate [REDACTED]; Gibson, Mary [REDACTED]; Jain, Supna [REDACTED]
Subject: Public Input for the November 19 PZC Hearing for Karis Critical Data Centers (DEV-0057-2025)

CAUTION: This e-mail originated outside of the City of Naperville (@naperville.il.us).

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Planning & Zoning Commissioners,

It seems as though the links I included in my October 29 written comments made it into the public comments for the November 5th meeting. They were:

- **2022 Land Use Plan:**

<https://www.naperville.il.us/contentassets/7fed1bf2ba19496fa9a037f019616748/2022-03-11-final-naperville-land-use-master-plan.pdf>

- **2025 Naperville I-88 Corridor Strategy**

<https://naper.org/images/i88-study.pdf>

- **Municipal Code Zoning Designations**

https://library.municode.com/il/naperville/codes/code_of_ordinances?nodeId=TIT6ZORE

- **2021 Fermilab Site Sustainability Plan**

<https://sustainability.fnal.gov/wp-content/uploads/2021/01/Fermilab-FY21-Site-Sustainability-Plan-posted.pdf>

As one of the goals of both the 2022 Land Use Plan and the 2025 Naperville I-88 Corridor Strategy is to encourage more multifamily developments with on-site amenities in the I-88 Corridor, I do not understand why it would be considered at all appropriate to place one of the most intensive and conditional uses of ORI zoning in an area that since 2022 has been designated and proceeding to be developed as residential. Even if you were to ignore all the unknowns the impact on Naperville's power needs or the environmental controversy, one thing seems clear: people do not want to live so close to a data center. Recommending a data center at this location at this time seems to be sabotaging all recent planning. For example, consider these two statements from page 51 of the 2025 Naperville I-88 Corridor Strategy:

Collaborate with the City to identify next steps in creating a special zoning district (ideally incorporating recommendations from the Master Planning exercise) along I-88 that allows for a more dense, mixed-use, walkable, pedestrian- and transit-friendly environment, and the following zoning changes: reduced parking requirements; mixed-use development allowed; higher floor area ratios (FARs); and preservation of open space. Encourage City to consider the development of placemaking/design guidelines for new development, incorporating principles of "complete streets", along with the inclusion of green space and recreation areas.

With the goal of incorporating additional residential development as a complementary use along the Corridor, work on a strategy to designate specific residential growth areas along the Corridor and throughout Naperville. Determine specific recommendations for density/typology mix, integrating residential with commercial and light industrial uses, and preserving open space and existing amenities where possible.

If indeed more residential and new industries such as data centers are desirable along I-88, it would make far more sense for Naperville to place a Data Center in an area along the corridor all ready designated for more intense uses such as an Employment of Regional Center.

Again,

- A place type of Medium Density Residential, means uses compatible with R2 and R3 zoning. Conditional uses for R2 and R3 zoning do not include Data Centers as either permitted or a conditional use. Data Centers are only permitted as a conditional use in the two most intensive zoning designations: Office, Research, and Light Industrial (ORI) and Industrial (I). Conditional use for a Data center is in conflict with the adopted comprehensive master plan.
- This parcel, along with Naper Commons and the remaining Nokia property, is the only area along the I-88 Corridor in the 2022 Land Use Plan with the future designated Land Use of Medium Density Residential. The rest of the I-88 Corridor that was studied was designated either as a Regional Center or Employment Center. Approving a Data Center in what has been proceeding to become residential will make it more difficult to include residential components along the I-88 Corridor. It will sow community, business owner, and developer mistrust. It is highly likely to diminish and impair property values in the neighborhood and potential residential property values anywhere else in the I-88 corridor.
- Approving Phase I of the Data Center with no thought of what would be appropriate for the remaining space is poor planning.
- Naperville is struggling planning for our future power needs. We do not need the unknowns of this data center or other data centers to complicate the risk at least at this time. The electrical usage for Phase I is like concentrating half of the entire 2011 electrical usage at Fermilab into a single building on roughly 20 acres and only 1/4 mile from residences. If Phase II were to be built it would be similar to concentrating all of the 2011 electrical usage at Fermilab in only 2 buildings, on roughly 40 acres, and only about 300 ft from residences.

This Data Center should not be recommended or approved.

Thank you for your consideration.

Marilyn L. Schweitzer
Naperville/IL

—
Marilyn L. Schweitzer

████████████████████
████████████████████

**Analysis of the "THE POTENTIAL FISCAL IMPACTS OF THE PROPOSED KARIS
CRITICAL DATA CENTER DEVELOPMENT IN NAPERVILLE Report by: Gruen Gruen +
Associates July 2025"**

By: James Butt – 11/3/2025

████████████████████

████████████

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Summary

Karis Critical, LLC “petitioner” commissioned and submitted to the Naperville Planning Commission a report “THE POTENTIAL FISCAL IMPACTS OF THE PROPOSED KARIS CRITICAL DATA CENTER DEVELOPMENT IN NAPERVILLE” - Dated July 2025 from GRUEN GRUEN + ASSOCIATES to show potential fiscal impacts of the proposed colocation data center. This review is to highlight structural issues with energy usage estimates provided by Karis Critical to Guen Gruen + Associates in the report and the resultant exaggerated tax impact for Naperville and how homes provide a higher and more stable overall tax income.

The initial submittals from Karis Critical specified two colocation data center buildings but after review by the City of Naperville it was determined that Naperville’s power infrastructure could only support one of the two buildings and the Karis Critical reduced the development to a single data center building.

This paper has been peer reviewed by a licensed CPA, a licensed industrial electrical contractor, and by various technologists with decades of data center experience.

Key Takeaways

- The document the petitioner has submitted and presented is now incorrect as it has a base assumption that the original proposal for two buildings is being proposed, it is unclear of the reason the petitioner has not updated this report for accurate number.
- Petitioners power use estimates provided to Gruen Gruen + Associates are not realistic in comparison to documented industry standards and result in elevated utility tax revenue projections. Realistic electricity use based on documented industry standards show utility taxes are much closer to \$339k per year vs the \$622k to \$1.519m per year range their report suggests.
- The petitioner does not have any track record of building and operating colocation data centers, the phased construction of the first building is indication that they and or their lender is concerned with their ability to acquire customers to allow the facility to be profitable as two construction phases on the same building will incur additional costs.
- Power use will increase as they add customers, yet the petitioner contracting new customers is not guaranteed. The report assumes that data center is full and does not account for customers being added over time where the petitioners own phased build out approach indicates they are unsure how quickly they will find customers.
- The petitioners customer retention is not guaranteed as technology evolves and the potential for a crash of the data center market from an AI Bubble Burst making it a less stable tax income source than homes.
- The “megaproject” Illinois House Bill 4058 and State Senat Bill SB1514 proposed puts 78% of the petitioners proposed property tax revenue at risk capping the property taxes at \$281,000 as opposed to the proposed \$634,848 if both Phase 1A and Phase 1B are completed.
- Homes would generate over \$999k in more tax revenue than the proposed datacenter and approximately \$3m more if the lot where the Nokia building was used for homes.
- Naper Commons and Danada Woods Property taxes are likely to be reduced if the facility is constructed based on the impact of the development of the data center.
- Karis is asking the city of Naperville to approve a speculative development with the prospect of tax dollars from electricity that may never be used as utility tax is directly related to their sales performance and could be at risk from AI bubble bursting and ability to successfully run data center operations.
- Overall tax revenue could be as low as \$326k and as high as \$974k less than half of what Karis has estimated.

			Industry Standards Based	
	Karis Low	Karis High	Estimated Low	Estimated High
Annual City Electric Tax Revenue	\$ 622,956	\$ 1,529,073	\$ 45,306	\$ 339,720
Property Tax Revenue	\$ 634,848	\$ 634,848	\$ 281,053	\$ 634,848
Total	\$ 1,257,804	\$ 2,163,921	\$ 326,359	\$ 974,567

Inaccuracies based on single building being constructed

Page 1: Table 1: Column "Phase 2" should be removed as this is the second building

Page 1: Table 1: Column "Total" is incorrect as it has value for the second building for Phase 2

Page 1: Table 1: Column "Total" - Electrical Utility Tax should have \$934,434 to \$1,529,073

Page 1: Table 1: Column "Total" - Property Tax should have \$45,000

Page 1: Statements After Table 1: All dollar amounts minimum double reality based on one versus two buildings and overstated based on facility maximums vs real world data center load. See section: "Real World Data Center Power Utilization"

Page 2: "School District 203 is estimated to receive the largest share of annual property tax revenue at over \$998,000. The Naperville Park District is estimated to receive approximately \$60,000 in annual property tax revenue." - All dollar amounts minimum double reality based on one versus two buildings - School District D203 Phase 1A - \$146,404 and Phase 1AB \$488,014.40 - The Naperville Park District Phase 1A \$20,565.37 and Phase 1AB \$29,379.11

Page 3: Table 3: Columns Phase 2 should be removed, and Total is incorrect as it includes Phase 2

Page 1: Table 1: It is important to note that Phase 1B will not exist initially and may take the petitioner years to fill the data center for Phase 1A. It cannot be assumed that Phase 1B Revenues will ever exist.

Page 1: Table 1: All Electric Utility Tax Revenues are overstated based on facility maximums vs real world data center load. See section below: "Real World Data Center Power Utilization"

Page 3: Table 3: Row "Annual Electric Expenditures" are using very inflated values that no industry data support. See sections below "Real World Data Center Power Utilization" due to this row "Annual City Electric Tax Revenue" values are inflated. It is estimated based on actual published industry data that "Annual Electric Expenditures" - Phase 1A - between \$8,287,660.80 and \$12,459,116.74 and "Annual City Electric Tax Revenue" between \$414,383.04 and \$622,955.84. And Phase 1B Revenue between \$4,143,830.40 and \$6,229,558.37 with taxes between \$207,191.52 and \$311,477.92. The Total Column using 1A+1B should have Revenue \$12,431,491.20 and \$18,688,675.10 and utility taxes between \$621,574.56 and \$934,433.76.

Page 3: Statements under Table 3 have incorrect numbers based on the inaccuracies of base energy use data.

Page 4: Table A-1 - Data is incorrect as the data is for two data center buildings.

Correct Data:

		Phase 1A - 1 Building	Phase 1B - 1 Building	Total Phase 1A/1B
City of Naperville Library	\$0.1745	\$12,658	\$5,425	\$18,083
City of Naperville	\$0.4246	\$30,801	\$13,200	\$44,001
College of DuPage 502	\$0.1794	\$13,014	\$5,577	\$18,591
County of DuPage	\$0.1361	\$9,873	\$4,231	\$14,104
DuPage Airport Authority	\$0.0122	\$885	\$379	\$1,264
Forest Preserve District	\$0.1310	\$9,503	\$4,073	\$13,576
Lisle Township	\$0.0376	\$2,728	\$1,169	\$3,896
Lisle Township Mental Health	\$0.0161	\$1,168	\$501	\$1,668
Lisle Township Road	\$0.0219	\$1,589	\$681	\$2,269
Naperville Park District	\$0.2835	\$20,565	\$8,814	\$29,379
Unit School District 203	\$4.7092	\$341,610	\$146,404	\$488,014
Totals		\$444,393	\$190,454	\$634,848

Page 4 Statement: "School District 203 is estimated to receive the largest share of annual property tax revenue at over \$998,000. Naperville is estimated to receive approximately \$90,000 in annual property tax revenue. The Naperville Park District is estimated to receive approximately \$60,000 in annual property tax revenue." is incorrect - School District will receive \$488k, Naperville \$44k, and Park District \$29k.

Page 5 Table 1B: Facility Capacity based on both buildings should be Phase 1A 24k and Phase 1B 12k and the Total 36k

Real World Data Center Power Utilization

Overview of data center power systems

Data Centers offering colocation services are in the business of selling space, cooling, internet, and power for servers. Ultimately there is a well-defined formula for pricing data center space based on power. Data center services are primarily sold as individual locking racks in shared space or individual racks contained within private caged spaces. Rack pricing is directly related to the power available at each rack. Most colocation customers pay a contracted fixed amount that includes space and power and pay the same amount monthly if they use the power or not. It is not as common for customers to pay based on metered power offered by some colocation providers and when available contract terms specify maximum power amounts available to the customer. Each rack generally has primary and backup power distribution units that are served by independent uninterrupted power supplies (UPS), Transfer Switches, and generators providing fully redundant power. Generally, enterprise level servers and IT equipment that would be mounted in the racks are equipped with multiple power supplies allowing primary and backup power to be used to ensure that all components are redundant to avoid failure. However, in the event the customer actively uses available power in the rack exceeding the primary or backup power circuits they will not have power redundancy and may cause a circuit breaker to trip and will experience a failure during maintenance and power outages. It is common that customers perform detailed planning and analysis to ensure that they are not overloading circuits based on the power needs of a server, power distribution unit, or individual rack. Typically, customer power distribution units in each rack are electronically metered and able to be monitored and audited to ensure safe utilization thresholds are maintained.

One of the primary ways that customers estimate power is the nameplate rating of individual servers and other IT equipment to ensure there is adequate spare power if systems were to use power up to the nameplate rating. To be compliant with National Electrical Code requirement NEC 210.20(A): This section states that the overcurrent device must be rated for at least 125% of the continuous load plus 100% of the noncontinuous load. UL (Underwriters Laboratories) and IEC (International Electrotechnical Commission) have a similar requirement UL/IEC 60950-1 (Information Technology Equipment - Safety) Annex NAE stating, "The attachment plug configuration shall be one that is rated not less than 125 percent of the current rating of the equipment". This applies to all components within the data center and every component in the electrical system will have at least a 25% buffer from the maximum power available. Rack data center power distribution units typically have a "derated load" ensuring a safety factor is built into the unit so customers are unable to overload circuits. As an example, a power distribution unit may connect to a 208v 50 AMP (10.4 kw) circuit, but the unit is only rated for 208v 37.5 AMP (7.8kw) of usable power to maintain a safety margin. The data center bases their power needs on the circuit size not the derated load of the power distribution unit.

Server Power

Servers in practice do not use anywhere near their nameplate rated power during normal operation, however the customer and the data center provider must build capacity based on the nameplates. Nameplate ratings on servers reflect the full power needs of a server if it had all expansion slots in use, all the hard disk slots populated, and was running at 100% CPU utilization 100% of the time. In the same way that power is estimated for each server, the servers themselves have power and safety buffers that make it almost impossible to ever see nameplate rated power usage. Scenarios even approaching 100% power utilization generally only happen in extreme cases such as very high sustained load in an environment where cooling is inadequate to cool a server, so the servers' internal fans run at full speed. This would reflect a worst-case scenario where data center cooling was not functioning properly and a workload on the server was operating significantly outside of optimum conditions.

Server Utilization

Servers do not typically run at 100% CPU utilization, as performance issues start to happen over 80% utilization. Even 2028 projected AI Training workloads are projected to have a maximum of 80% utilization and AI training is typically not something that happens continuously, it is something that happens at pre-defined intervals and most other AI workloads are used to perform inference where the AI uses the trained data. The inference workloads have a much lower 40% CPU utilization. While this has changed rapidly in the last few years one of the most cited sources of data has been the United States Department of Energy Lawrence Berkely National Laboratory Report "2024 United States Data Center Energy Usage Report" - See reference 1. In contrast to AI the report indicates that current colocation CPU Utilizations are less than 25% in 2024 and expected to only be 35% in 2027.

The proposed data center will operate as a colocation facility with a diverse range of clients and workloads. Some of these workloads will include AI training tasks, which generally have higher power utilization, on average, than non-AI workloads. However, even clients with servers running AI training workloads will also host many other applications with significantly lower power demands. Moreover, AI training workloads are not typically active around the clock; they often remain idle between training sessions. For most enterprise AI applications, continuous training is unnecessary; training is usually performed only when substantial changes occur in the data or when the model itself is significantly modified.

You will see in the below graph from the "2024 United States Data Center Energy Usage Report" that outside of AI workloads that server workloads will be less than 50% capacity on average. Even a server at 100% workload does not mean the server will be at 100% nameplate capacity but typically 75% of nameplate capacity.

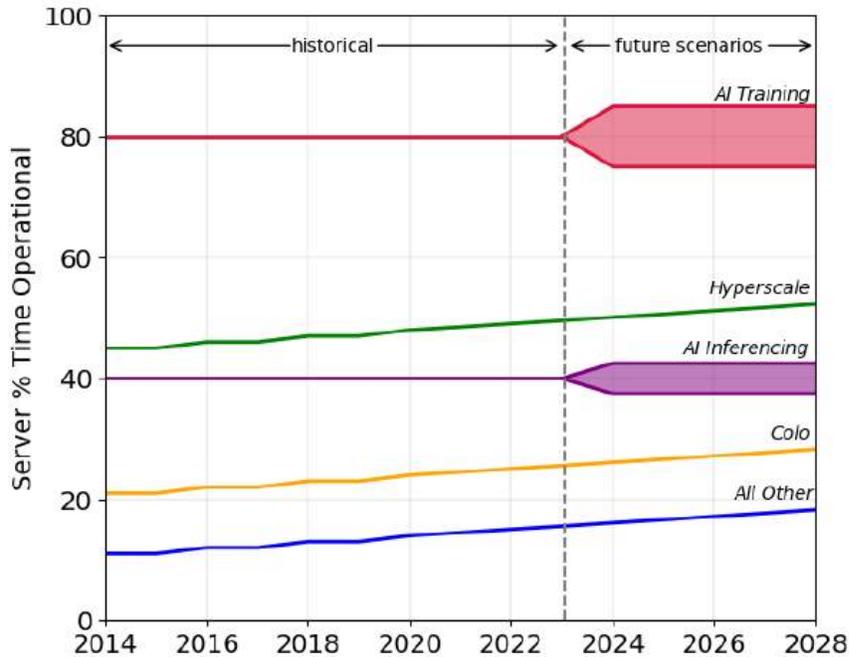


Figure 3.6. Operational time of servers given data center type.

Other workloads tend to have varied usage patterns based on users using the applications where daytime usage is much higher than nighttime usage. While workloads for streaming services like Netflix are far busier at night than they are during the day based on their usage and enterprise banking and retail workloads will be busier during the day than night.

Data Center Customers Size for Growth

Data center customers must plan for peak usage and plan for increased usage over time. Most data center customers are going to plan 3+ years in advance when negotiating with a data center provider and contract for available power and space they may or may not initially need to support business growth. This means that they will buy capacity that will sit unused, this is especially common for the largest data center customers that are utilizing private cage space as they need to size their cages and racks to ensure that they will meet their long-term needs. However, smaller customers may utilize individual racks and may have spare racks or spare space and power in racks to meet their future needs. This can be looked at like a growing family as typically you are buying a home for the future requirements of more children.

Data center providers must reserve sufficient power capacity to support the combined maximum potential usage of all their customers. It is common for customers to project 30–50% growth over a three-year period. For example, a customer might contract 10 racks of space, with each rack rated between 8 kW and 200 kW. They may initially populate only 5 of those racks, leaving the remaining 5 available for future expansion—resulting in 40 kW to 1,000 kW of power

capacity being allocated but not actually used. The capacity is sold - but power is not consumed, and as such, the data center incurs no utility costs or taxes on it. When customer contracts expire and tenants vacate, there may be periods during which significant portions of rack space and power capacity remain idle until new customers are secured.

How Data Centers Are Constructed

There are clear reasons why the petitioner's facility is being proposed in the manner it is, and it is consistent for colocation facilities. Data Center providers typically build a large shell that has partially built out infrastructure inside. As they contract customers, they build out internal sections or data halls within the shell of the building and add infrastructure components such as cooling, power, and generators over time as they add customers. This also allows the data center to extend capital outlay over time as opposed to building power and cooling systems that will not be used until new customers come. If the data center is slow at signing up customers, then they will slowly build out the data center halls and slow to use additional power. In the petitioner's case they have spread the actual building construction into two phases likely due to phased capital outlay of their lender based on customer contracts. Power consumption and tax revenues will ramp up over time and are not at all guaranteed. This is an indication that they and their lender understand that there is some speculative nature to the project and that clients will come slowly over a longer period of time otherwise they would build phase 1A and phase 1B at the same time as it is more cost effective in the long term.

Power Usage Effectiveness (PUE)

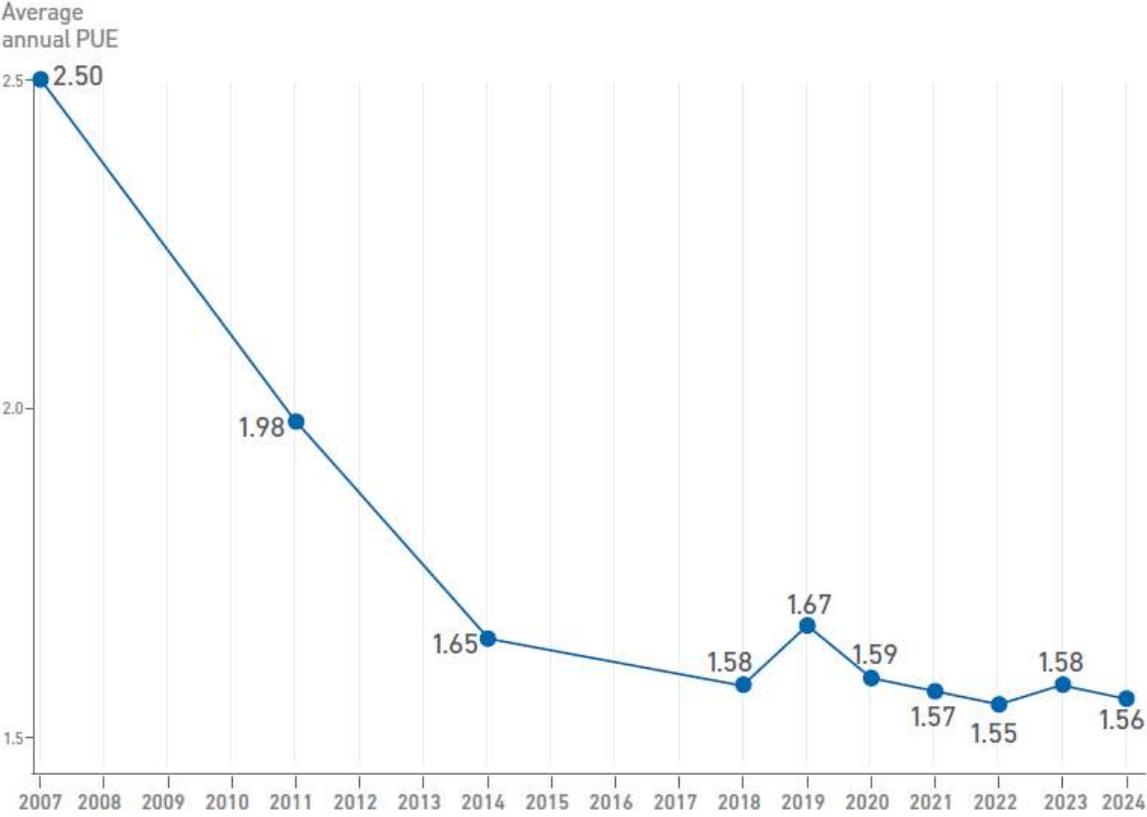
The Uptime Institute defines PUE (Power Usage Effectiveness) in their 2024 Annual report (see reference 2) as:

"Data center operators calculate PUE as a proxy for facility efficiency and a component of sustainability progress. PUE estimates the energy efficiency of a facility and helps track its change over time with a simple calculation: total facility power divided by power consumption of IT equipment. PUE was first defined by The Green Grid in 2007 and has since become the standard metric for facility energy efficiency." PUE is calculated as $(\text{Total Facility Energy} / \text{IT Equipment Energy})$.

In the petitioner's fiscal impact report, it is stated on Page 5 Table 1B: Annualized PUE value of 1.23. The 1.23 value goes against industry averages and is likely unachievable based on published data without adiabatic "evaporative water based" cooling or water based. The overall value is likely to be closer to 1.56 based on industry averages.

Industry average PUE holds steady

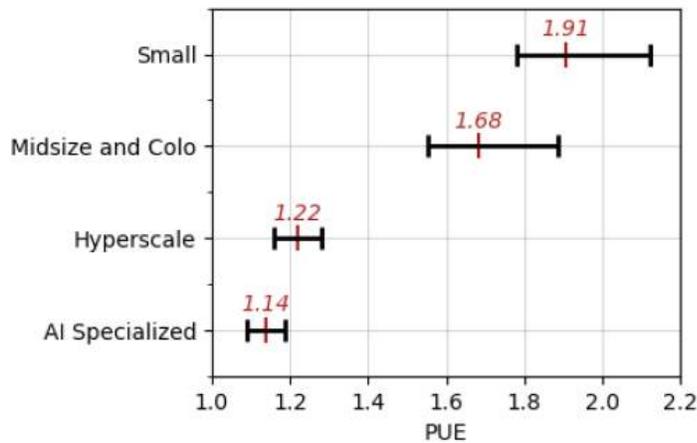
What is the average annual PUE for the largest data center your organization owns / operates? (n=526)



UPTIME INSTITUTE GLOBAL SURVEY OF IT AND DATA CENTER MANAGERS 2007-2024



Similarly, in the “2024 United States Data Center Energy Usage Report” show that colocation facilities have a higher PUE range than HyperScalers such as Amazon, Microsoft, and Google. HyperScalers and Dedicated AI data centers have some advantages to colocation data centers as they have the ability build a very purpose build data center that is not used for customer colocation and control exactly what server equipment is used and can achieve much higher densities and efficiencies. They are also able to fill data center racks fully as they need to add capacity. Where colocation data centers will have varied types and sizes of servers and will have large numbers of empty and partially filled racks as they will leave growth expansion space throughout their racks.



The submitted PUE value not matching industry standards overall has little impact other than they will see higher actual power usage in relation to customer power usage. However it does show that there may be some misunderstanding of industry averages for colocation data centers.

Utilization vs Load Factor

Data center utilization is the actual measurement of (electrical capacity vs used capacity) while Load Factor is how consistently a system is running at its capacity, a higher Load Factor is better, indicating consistent usage. Calculated as (Average Load / Peak Load used).

Load Factors for data centers are typically high because average load vs peak load is consistent across all customers and all workloads, but this is different from overall utilization based on overall capacity.

In the petitioner’s report on Page 5 Table 1B: In terms of their calculation labeled as Utilization Factor/Load Factor the values represented are a Utilization Load based on how they are used. Load factors of 0.55, 0.70, and 0.90 are not practical numbers. No industry data supports a whole colocation data center achieving utilization levels of 0.55 and 0.70 really should have

been the hypothetical high number with 0.9 being impossible based on all the discussed constraints.

Although their calculations are based on two buildings, the data shows a total power utilization of 79.7 MW compared to 72 MW. Applying the same methodology to the proposed Phase 1A/1B “High” consumption figures yields 39.8 MW, not 36 MW as stated. This suggests that the 36 MW figure refers *only* to customer power usage, with additional building, HVAC, and environmental loads to be added on top of that—meaning the total load would be:
36 MW (customer power) + building/HVAC loads = total power utilization.

The petitioners Base and High Utilization Factor/Load Factor numbers are higher than any published data I can find for a colocation facility. It is not reality that you would have a datacenter that is at 100% nameplate capacity, and all servers operate at 90% of their capacities. This very well could lead to catastrophic over-current situations if they lost cooling capacity within the data center as systems would increase their fan speed to stay cooler and overall systems efficiencies would drop due to elevated temperatures and further increase power consumption over the limits of over-current protection devices.

Realistic Customer Load Calculation

The below formulas are calculations for individual customers within the data center. All customers contracted power values would be added together until the maximum 36 MW of available customer power for the facility.

Individual new colocation customer of a data center power “need” calculation:

$$\begin{aligned} &\text{Example Nameplate IT Load: 50 kW (kilowatts)} \\ &\quad + \\ &\text{Projected Growth (50%): 50 kW increase over 5 years} \\ &\quad = \\ &\text{Total Future IT Load: 100 kW (kilowatts)} \\ &\quad \times \\ &\text{Safety Margin (to meet NEC and other Requirements) 1.25} \\ &\quad = \\ &\text{Customer Contracted Power 125.5 kW (kilowatts)} \end{aligned}$$

Customers must contract and pay monthly for 125.5 kW (kilowatts) of power from data center whether they use all the power or not and data center must reserve capacity plus facility power including customer equipment cooling/lights and other facility uses to cover if that power is used.

Actual new customer data center use year one:

$$\begin{aligned} &\text{Example Nameplate IT Load: 50 kW (kilowatts)} \\ &\quad \times \\ &\text{Actual Server Utilization (Utilization Factor): 0.40} \\ &\quad = \\ &\text{Actual Utilization: (50 kW times 0.40) = 20 kW (kilowatts)} \\ &\quad \times \\ &\text{Efficiency Factor: Target PUE of 1.56 (facility power equipment cooling/lights/other)} \\ &\quad = \\ &\text{Actual Power Used by Datacenter: 31.2 kW (kilowatts)} \end{aligned}$$

Difference between contracted and actual power usage:

$(125.5 \text{ kW} - 31.2 \text{ kW}) = 94.3 \text{ kW}$, or approximately **76% less than the contracted amount**. Data centers typically bill customers based on their **committed power capacity**, rather than actual usage. As a result, it is often advantageous for the data center when customers consume less power than contracted, since the provider receives payment for capacity that is reserved but not utilized.

Given that all tax revenues will be based on actual power consumption, and not capacity planning requirements, the below calculations are *critical* in producing accurate projections.

Data Center Power Use Calculation

Karis Critical Provided Power Calculation Table B-1 (Low)

Assumes customers will not reserve capacity for growth and will have a Utilization Factor higher than industry averages for collocation.

Customer Contracted Capacity (KW/Kilowatts) 36,000 (72k kw / 2 for single building)

X

365 Days

X

24 Hours

=

Nameplate Critical IT 315,360,000 KWH/Yr (Kilowatt Hours per Year)

X

Annualize PUE 1.23

X

Utilization Factor= 0.55

=

Total Annual 213,341,040 KWH (Kilowatt Hours)

X

Effective Power Rate (\$/KWH) \$0.0876

=

City Utility Revenue \$18,688,675.10

X

City 5% Utility Tax

=

City Tax Revenue = \$934,433.76

Reality Power Calculation

Customer sets aside 50% of power for growth and Industry average colocation utilization factor of 0.40

$$\begin{aligned} & \text{Customer Capacity (KW/Kilowatts) } 36,000 \text{ (72k kw / 2 for single building)} \\ & \quad \times \\ & \quad \quad 365 \text{ Days} \\ & \quad \quad \times \\ & \quad \quad \quad 24 \text{ Hours} \\ & \quad \quad \quad = \\ & \text{Nameplate Critical IT } 315,360,000 \text{ KWH/Yr (Kilowatt Hours per Year)} \\ & \quad \times \\ & \quad \quad \text{Reserved for Customer Growth } 50\% \\ & \quad \quad \quad = \\ & \text{Contracted Customer Power - } 473,040,000 \text{ KWH/Yr (Kilowatt Hours per Year)} \\ & \quad \times \\ & \quad \quad \text{Utilization Factor/Load Factor } 0.55 \\ & \quad \quad \quad = \\ & \text{Actual Customer Power Utilization } 189,216,000 \text{ KWH/Yr (Kilowatt Hours per Year)} \\ & \quad \times \\ & \quad \quad \text{Annualize PUE (Facility/Cooling/Lights/Other) } 1.23 \\ & \quad \quad \quad = \\ & \text{Total Annual KWH/Yr } 77,578,560 \text{ KWH/Yr (Kilowatt Hours per Year)} \\ & \quad \times \\ & \quad \quad \text{Effective Power Rate (\$/KWH) } \$0.0876 \\ & \quad \quad \quad = \\ & \quad \quad \quad \text{City Utility Revenue } \$6,795,881.86 \\ & \quad \quad \quad \times \\ & \quad \quad \quad \quad \text{City } 5\% \text{ Utility Tax} \\ & \quad \quad \quad \quad \quad = \\ & \quad \quad \quad \quad \quad \text{City Tax Revenue} = \$339,794.09 \end{aligned}$$

Realistic Power and Taxes - Phase 1A

The below data table represents derived values from the petitioners “Potential Fiscal Impact” report due to the petitioner only supplying a table representing 2 data center buildings. The second, third, and fourth columns use identical formulas with a down adjusted capacity to match the reduction from two buildings to one. The 2nd column labeled “reality” represents a normalized industry Utilization Factor/ Load Factor of 40% based on “2024 United States Data Center Energy Usage Report” projections. See Reference 1. Reality represents a significant difference in utility tax revenue per year and that is assuming that the facility 100% filled to contracted Nameplate capacity based on the overall facility power capacity. The overall power usage is likely to be much less based on client growth reserved capacity and the assumption that data center has fully committed power by customers for the full year and is likely representative of year 3 of operations as customer acquisition will happen over time.

Only 1A Building					
	Based on Industry		Based on Karis Submitted Numbers		
	Reality 50% Customer Growth Year One	Reality No Customer Growth	Low	Base	High
Customer Capacity (kw)	24,000	24,000	24,000	24,000	24,000
Days/Yr	365	365	365	365	365
Hours/Day	24	24	24	24	24
Nameplate Critical IT KWH/Yr	210,240,000	210,240,000	210,240,000	210,240,000	210,240,000
Reserved for Customer Growth	50%	0%	0%	0%	0%
Contracted Customer Power	315,360,000	210,240,000	210,240,000	210,240,000	210,240,000
Utilization Factor	0.40	0.40	0.55	0.70	0.90
Actual CustomerKWH/Yr	42,048,000	84,096,000	115,632,000	147,168,000	189,216,000
Annualized PUE	1.23	1.23	1.23	1.23	1.23
Facility (Cooling/Lights/Other)	9,671,040	19,342,080	26,595,360	33,848,640	43,519,680
Total Annual KWH	51,719,040	103,438,080	142,227,360	181,016,640	232,735,680
Actual (KW)	5,904	11,808	16,236	20,664	26,568
Effective Power Rate (\$/kwh)	\$0.0876	\$0.0876	\$0.0876	\$0.0876	\$0.0876
City Utility Revenue	\$ 4,530,587.90	\$ 9,061,175.81	\$ 12,459,116.74	\$ 15,857,057.66	\$ 20,387,645.57
City 5% Utility Tax	\$ 226,529.40	\$ 453,058.79	\$ 622,955.84	\$ 792,852.88	\$ 1,019,382.28

Realistic Power and Taxes Phase 1A and 1B

Reality based on “2024 United States Data Center Energy Usage Report” projections. See Reference 1. The Karis submitted data below in columns Low, Base, and High assumes that data center has fully committed power by customers for the full year and Low or Base may be representative of year 3 of operations if Karis achieves very high levels of sales success as customer acquisition will happen over time.

The combined Phase 1A and Phase 1B capacity below is still far below the utility tax estimates that the developer has submitted.

1A + 1B Building					
	Based on Industry		Based on Karis Submitted Numbers		
	Reality 50% Customer Growth Year One	Reality No Customer Growth	Low	Base	High
Customer Capacity (kw)	36,000	36,000	36,000	36,000	36,000
Days/Yr	365	365	365	365	365
Hours/Day	24	24	24	24	24
Nameplate Critical IT KWH/Yr	315,360,000	315,360,000	315,360,000	315,360,000	315,360,000
Reserved for Customer Growth	50%	0%	0%	0%	0%
Contracted Customer Power	473,040,000	315,360,000	315,360,000	315,360,000	315,360,000
Utilization Factor	0.40	0.40	0.55	0.70	0.90
Actual CustomerKWH/Yr	189,216,000	126,144,000	173,448,000	220,752,000	283,824,000
Annualized PUE	1.23	1.23	1.23	1.23	1.23
Facility (Cooling/Lights/Other)	43,519,680	29,013,120	39,893,040	50,772,960	65,279,520
Total Annual KWH	77,578,560	155,157,120	213,341,040	271,524,960	349,103,520
Actual (KW)	8,856	17,712	24,354	30,996	39,852
Effective Power Rate (\$/kwh)	\$0.0876	\$0.0876	\$0.0876	\$0.0876	\$0.0876
City Utility Revenue	\$ 6,795,881.86	\$ 13,591,763.71	\$ 18,688,675.10	\$23,785,586.50	\$30,581,468.35
City 5% Utility Tax	\$ 339,794.09	\$ 679,588.19	\$ 934,433.76	\$ 1,189,279.32	\$ 1,529,073.42
Estimated Facility Revenue	65,700,000	42,398,400	58,297,800	74,197,200	95,396,400

It is acknowledged that petitioner may have proforma estimations of customer energy utilizations. While unlikely, the petitioner may achieve their “low” submitted numbers with the correct mix of customers within the data center after several years of operation but would be outside of “2024 United States Data Center Energy Usage Report” projections. See Reference 1.

The petitioner is asking the City of Naperville to engage in speculation regarding potential tax revenue based on the data center market and their own ability to succeed within it. This approach is *far* more uncertain than residential development, where there is a well-established record of homes being built and sold in the area. In contrast, the “field of dreams” notion—if you build it, they will come—is not guaranteed in this case, and even if successful, may take far longer to realize than the petitioner is claiming and will be far closer to the Low estimates Karis proposed.

Proforma Power Utilization and Utility Tax Revenue Overtime

The Karis submitted data assumes that data center has fully committed power by customers for full years and does not represent the initial years of operation where the data center will add customers over time. The submission shows data that while overstated based on customer power use may be more likely after year 3 of operations as customer acquisition will happen over time.

Attached are more representative 3-year proformas based on real world customer colocation new customer acquisition and real-world power utilization information based on methods outlined in "Real World Data Center Power Utilization" section of this analysis.

Year 1 Performa

	Year 1 - Phase 1A ONLY 24MW Max Customer Capacity - Reality 50% Customer Growth Year One - Based on Industry												Yearly Totals
	5%	7%	10%	13%	15%	17%	20%	23%	25%	30%	35%	40%	
% of Facility Customer Contracted													
Contracted Customer Capacity	1,200	1,680	2,400	3,120	3,600	4,080	4,800	5,520	6,000	7,200	8,400	9,600	
Days/Yr	30	30	30	30	30	30	30	30	30	30	30	30	
Hours/Day	24	24	24	24	24	24	24	24	24	24	24	24	
Nameplate Critical IT KWH/Month	876,000	1,226,400	1,752,000	2,277,600	2,628,000	2,978,400	3,504,000	4,029,600	4,380,000	5,256,000	6,132,000	7,008,000	
Reserved for Customer Growth	50%	50%	50%	50%	50%	50%	50%	50%	50%	50%	50%	50%	
Monthly PUE	1.23	1.23	1.23	1.23	1.23	1.23	1.23	1.23	1.23	1.23	1.23	1.23	
Utilization Factor	0.40	0.40	0.40	0.40	0.40	0.40	0.40	0.40	0.40	0.40	0.40	0.40	
Total Monthly KWH	215,496	301,694	430,992	560,290	646,488	732,686	861,984	991,282	1,077,480	1,292,976	1,508,472	1,723,968	10,343,808
Actual (KW)	25	34	49	64	74	84	98	113	123	148	172	197	
Effective Rate (\$/kwh)	\$0.09	\$0.09	\$0.09	\$0.09	\$0.09	\$0.09	\$0.09	\$0.09	\$0.09	\$0.09	\$0.09	\$0.09	
Utility Revenue	\$ 18,877	\$ 26,428	\$ 37,755	\$ 49,081	\$ 56,632	\$ 64,183	\$ 75,510	\$ 86,836	\$ 94,387	\$ 113,265	\$ 132,142	\$ 151,020	\$ 906,118
5% Utility Tax	\$ 944	\$ 1,321	\$ 1,888	\$ 2,454	\$ 2,832	\$ 3,209	\$ 3,775	\$ 4,342	\$ 4,719	\$ 5,663	\$ 6,607	\$ 7,551	\$ 45,306
	Month 1	Month 2	Month 3	Month 4	Month 5	Month 6	Month 7	Month 8	Month 9	Month 10	Month 11	Month 12	

Year 2 Performa

	Year 2 - Phase 1A + 2B 36MW Max Customer Capacity - Reality 50% Customer Growth Year One - Based on Industry												Yearly Totals
	35%	40%	45%	55%	60%	65%	70%	75%	80%	85%	90%	100%	
% of Facility Customer Contracted													
Contracted Customer Capacity	12,600	14,400	16,200	19,800	21,600	23,400	25,200	27,000	28,800	30,600	32,400	36,000	
Days/Yr	30	30	30	30	30	30	30	30	30	30	30	30	
Hours/Day	24	24	24	24	24	24	24	24	24	24	24	24	
Nameplate Critical IT KWH/Month	9,198,000	10,512,000	11,826,000	14,454,000	15,768,000	17,082,000	18,396,000	19,710,000	21,024,000	22,338,000	23,652,000	26,280,000	
Reserved for Customer Growth	50%	50%	50%	50%	50%	50%	50%	50%	50%	50%	50%	50%	
Monthly PUE	1.23	1.23	1.23	1.23	1.23	1.23	1.23	1.23	1.23	1.23	1.23	1.23	
Utilization Factor	0.40	0.40	0.40	0.40	0.40	0.40	0.40	0.40	0.40	0.40	0.40	0.40	
Total Monthly KWH	2,262,708	2,585,952	2,909,196	3,555,684	3,878,928	4,202,172	4,525,416	4,848,660	5,171,904	5,495,148	5,818,392	6,464,880	51,719,040
Actual (KW)	258	295	332	406	443	480	517	553	590	627	664	738	
Effective Rate (\$/kwh)	\$0.09	\$0.09	\$0.09	\$0.09	\$0.09	\$0.09	\$0.09	\$0.09	\$0.09	\$0.09	\$0.09	\$0.09	
Utility Revenue	\$ 198,213	\$ 226,529	\$ 254,846	\$ 311,478	\$ 339,794	\$ 368,110	\$ 396,426	\$ 424,743	\$ 453,059	\$ 481,375	\$ 509,691	\$ 566,323	\$ 4,530,588
5% Utility Tax	\$ 9,911	\$ 11,326	\$ 12,742	\$ 15,574	\$ 16,990	\$ 18,406	\$ 19,821	\$ 21,237	\$ 22,653	\$ 24,069	\$ 25,485	\$ 28,316	\$ 226,529
	Month 13	Month 14	Month 15	Month 16	Month 17	Month 18	Month 19	Month 20	Month 21	Month 22	Month 23	Month 24	

Year 3 Performa

	Year 3 - Phase 1A vs 1B - Reality 50% Customer Growth Year One - Based on Industry												Yearly Totals
	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
% of Facility Customer Contracted	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Contracted Customer Capacity	36,000	36,000	36,000	36,000	36,000	36,000	36,000	36,000	36,000	36,000	36,000	36,000	36,000
Days/Yr	30	30	30	30	30	30	30	30	30	30	30	30	30
Hours/Day	24	24	24	24	24	24	24	24	24	24	24	24	24
Nameplate Critical IT KWH/Month	26,274,240	26,274,240	26,274,240	26,274,240	26,274,240	26,274,240	26,274,240	26,274,240	26,274,240	26,274,240	26,274,240	26,274,240	26,274,240
Reserved for Customer Growth	50%	50%	50%	50%	50%	50%	50%	50%	50%	50%	50%	50%	50%
Monthly PUE	1.23	1.23	1.23	1.23	1.23	1.23	1.23	1.23	1.23	1.23	1.23	1.23	1.23
Utilization Factor	0.40	0.40	0.40	0.40	0.40	0.40	0.40	0.40	0.40	0.40	0.40	0.40	0.40
Total Monthly KWH	6,463,463	6,463,463	6,463,463	6,463,463	6,463,463	6,463,463	6,463,463	6,463,463	6,463,463	6,463,463	6,463,463	6,463,463	77,561,556
Actual (KW)	738	738	738	738	738	738	738	738	738	738	738	738	738
Effective Rate (\$/kwh)	\$0.09	\$0.09	\$0.09	\$0.09	\$0.09	\$0.09	\$0.09	\$0.09	\$0.09	\$0.09	\$0.09	\$0.09	\$0.09
Utility Revenue	\$ 566,199	\$ 566,199	\$ 566,199	\$ 566,199	\$ 566,199	\$ 566,199	\$ 566,199	\$ 566,199	\$ 566,199	\$ 566,199	\$ 566,199	\$ 566,199	\$ 6,794,392
5% Utility Tax	\$ 28,310	\$ 28,310	\$ 28,310	\$ 28,310	\$ 28,310	\$ 28,310	\$ 28,310	\$ 28,310	\$ 28,310	\$ 28,310	\$ 28,310	\$ 28,310	\$ 339,720
	Month 25	Month 26	Month 27	Month 28	Month 29	Month 30	Month 31	Month 32	Month 33	Month 34	Month 35	Month 36	

Power and Utility Tax Yearly Summary

	Year 1	Year 2	Year 3	Total 3 Years	Year 4	Year 5	Year 6	Total 6 Years
Actual Power Used KWH	10,343,808	51,719,040	77,561,556	139,624,404	77,561,556	77,561,556	77,561,556	372,309,074
Utility Revenue	\$ 906,118	\$ 4,530,588	\$ 6,794,392	\$ 12,231,098	\$ 6,794,392	\$ 6,794,392	\$ 6,794,392	\$ 32,614,275
5% Utility Tax	\$ 45,306	\$ 226,529	\$ 339,720	\$ 611,555	\$ 339,720	\$ 339,720	\$ 339,720	\$ 1,630,714

Data Center Industry Tax Revenue Stability Concerns

Proposed Illinois “Megaproject” tax break

Proposed Illinois House Bill 4058 and State Senat Bill SB1514 proposes that development projects larger then \$100m will have their property taxes frozen for 23 to 40 years at pre-development levels. This bill is reported to be supported by the Illinois Senate, Illinois House, and the Governor.

For this development the current undeveloped property tax of \$281,000 will continue after the development as opposed to the \$1,298,733 proposed property tax resulting in a 78% reduction. See:

- “Brian Costin: Gov. JB Pritzker appointees’ plan shifts a mega property tax burden onto you” – The Center Square – 10/24/2025 – (see reference 11)
- “Critics warn Illinois’ ‘megaproject’ tax breaks shift costs to taxpayers” – Chicago Tribune – 10/7/2025 (see reference 12)

The effect of the Megaproject tax break would affect the tax revenue as follows:

		Total Phase 1A/1B	If Megaproject HB4058/SB1514 Equalized Assessed
City of Naperville Library	\$0.1745	\$18,083	\$8,006
City of Naperville	\$0.4246	\$44,001	\$19,480
College of DuPage 502	\$0.1794	\$18,591	\$8,231
County of DuPage	\$0.1361	\$14,104	\$6,244
DuPage Airport Authority	\$0.0122	\$1,264	\$560
Forest Preserve District	\$0.1310	\$13,576	\$6,010
Lisle Township	\$0.0376	\$3,896	\$1,725
Lisle Township Mental Health	\$0.0161	\$1,668	\$739
Lisle Township Road	\$0.0219	\$2,269	\$1,005
Naperville Park District	\$0.2835	\$29,379	\$13,006
Unit School District 203	\$4.7092	\$488,014	\$216,048
Totals		\$634,848	\$281,053

Illinois Biometric Information Privacy Act (BIPA)

There are a number of factors that leave Illinois based data center colocation providers at a disadvantage, primarily the Illinois Biometric Information and Privacy Act (BIPA).

“(BIPA) is causing a pause in the state of Illinois by cloud providers and those with AI investment,” says Dan Diorio, vice president of state policy for the Data Center Coalition, a trade group that represents data center operators including Amazon, Google, Meta, Microsoft, Cyrus One, Digital Realty, Equinix, Prologis and T5. “We have developments that are a bit stalled.”

Data center developers say some of the biggest projects are bypassing Illinois for Indiana, Wisconsin, Iowa and Michigan.” - “How Illinois' privacy law is costing Chicago billions in data-center deals” - Crain's Chicago Business - 9/23/2025

“The pipeline in Chicago also is showing signs of weakness.” - “How Illinois' privacy law is costing Chicago billions in data-center deals” - Crain's Chicago Business - 9/23/2025

“Nearly 80% of new development projects nationally are pre-leased,” Cveengros says. “When you look at what’s coming to market in Chicago in 2026, you have several projects that are not pre-leased.” - “How Illinois' privacy law is costing Chicago billions in data-center deals” - Crain's Chicago Business - 9/23/2025

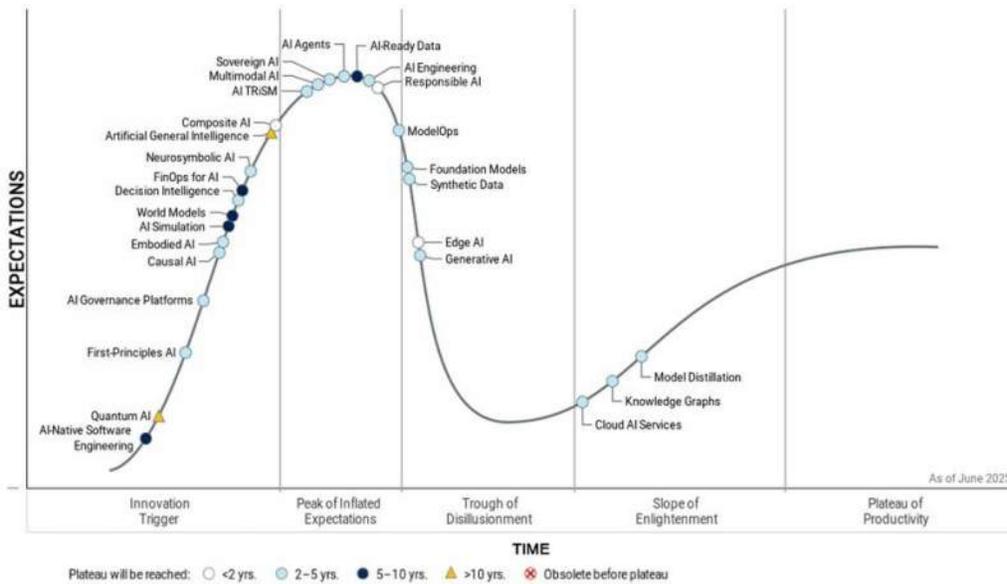
“JLL’s data only includes co-location data centers, or those that rent space to multiple tenants, not the projects that so-called hyperscale users, such as Amazon, Google, Microsoft and Meta, are building themselves. Those are the projects most prized by developers, labor unions and local governments.” - “How Illinois' privacy law is costing Chicago billions in data-center deals” - Crain's Chicago Business - 9/23/2025

AI Bubble

The “AI Bubble” is a legitimate concern that large quantities of data center capacity are being built out that may never get used as companies find that investments in AI are not paying off or choose to use a hyperscaler like Amazon, Google, Meta, or Microsoft to provide AI services instead of building their own AI infrastructure in a colocation data center. This is the trend that I have observed with my large enterprise customers.

“A small group of companies is securing most of the major deals. News about multibillion-dollar investments from familiar companies such as OpenAI, Nvidia, CoreWeave, Microsoft, Google, and a few others is reported almost daily. Should the bold promises of AI fall short, the dependence among these major AI players could trigger a devastating chain reaction, causing a widespread collapse similar to the 2008 Great Financial Crisis.” As cited in a Yale Insights article “This Is How the AI Bubble Bursts” See reference: 5.

Gartner a respected technology research and advisory firm, says we are currently in the “Trough of Disillusionment” See Reference: 6. This is typically the point in where a technology starts to operationalize at scale.



Gartner

As enterprises have rushed to pursue AI due to many reasons, they have started to pursue third party AI service providers for their AI infrastructure such as Amazon AWS, Google, and Microsoft that all have their own very large hyperscale data centers that are far larger than what is being proposed. The overall cost of AI chips and supporting infrastructure and limited availability of qualified AI engineers is causing most enterprises to look for third party AI providers.

“Developing AI solutions requires expertise in machine learning, data science, and software engineering—skills that are in high demand but short supply, with roles growing 74% annually. This talent crunch makes it difficult for companies to recruit and retain the professionals needed to build robust AI systems. More than half of businesses in the UK (51%) acknowledge that they don’t have the right mix of skilled AI talent in-house to bring their strategies to life.” See Reference 9: “The Evolution of Build Vs Buy - In Artificial Intelligence”

Other organizations that are offering AI as a service require very large hyperscale sized data center campuses such as the xAI Grok Colossus Gigawatt data center. See Reference 8: “Elon Musk xAI Importing Power Plant for New Data Center”. One of the largest names in AI; OpenAI has contracted with Amazon AWS to use its hyperscale data centers instead of building out additional AI infrastructure. See Reference 10: “Tech OpenAI signs \$38 billion compute deal with Amazon, partnering with cloud leader for first time”

While opportunities still exist for colocation providers such as the proposed Karis Data Center, these facilities are more likely to serve as replacements for older-generation data centers, accommodating customers seeking modern infrastructure with higher power density. Moreover, it is highly unlikely that this proposed facility, or any mixed-use colocation facility, will ever be fully occupied by AI-specific workloads or hyperscaler workloads that can have higher load and utilization.

Data Center vs. Homes

For Naperville, a new residential development with a density similar to Naper Commons, approximately 150 homes on 40 acres, would generate more than twice the property tax revenue of the proposed project and likely produce utility tax revenue comparable to that of the data center, based on more realistic power consumption. Moreover, this estimate does not account for the additional economic benefit residents provide by spending locally: contributing sales tax revenue through shopping, dining, and other commerce, whereas data center services are not subject to sales tax.

		Total Phase 1A/1B	If Megaproject HB4058/SB1514 Equalized Assessed	150 Homes	Nokia Lot 175 Home
City of Naperville Library	\$0.1745	\$18,083	\$8,006	\$52,350	\$61,075
City of Naperville	\$0.4246	\$44,001	\$19,480	\$127,380	\$148,610
College of DuPage 502	\$0.1794	\$18,591	\$8,231	\$53,820	\$62,790
County of DuPage	\$0.1361	\$14,104	\$6,244	\$40,830	\$47,635
DuPage Airport Authority	\$0.0122	\$1,264	\$560	\$3,660	\$4,270
Forest Preserve District	\$0.1310	\$13,576	\$6,010	\$39,300	\$45,850
Lisle Township	\$0.0376	\$3,896	\$1,725	\$11,280	\$13,160
Lisle Township Mental Health	\$0.0161	\$1,668	\$739	\$4,830	\$5,635
Lisle Township Road	\$0.0219	\$2,269	\$1,005	\$6,570	\$7,665
Naperville Park District	\$0.2835	\$29,379	\$13,006	\$85,050	\$99,225
Unit School District 203	\$4.7092	\$488,014	\$216,048	\$1,412,760	\$1,648,220
Totals		\$634,848	\$281,053	\$1,837,830	\$2,144,135

Naperville has approximately 54,286 households that generate a total of \$49.5 million in annual sales tax revenue. This equates to roughly \$911 in sales tax per household per year, meaning a 150-home neighborhood would contribute about \$136,000 annually in local Naperville sales tax revenue.

Tax Comparison

	Full Phase 1A/2B	If Megaproject HB4058/SB1514	150 Homes	Homes v. Data Center	Homes v. Data Center If Megaproject
Property Tax	\$ 634,848	\$ 281,053	\$ 1,837,830	\$ 1,202,982	\$ 1,556,777
Utility Tax	\$ 339,794	\$ 339,794		\$ (339,794)	\$ (339,794)
Sales Tax			\$ 136,650	\$ 136,650	\$ 136,650
Total Tax Revenue	\$ 974,642	\$ 620,847	\$ 1,974,480	\$ 999,838	\$ 1,353,633

Homes on Nokia Building Lot

If the datacenter is built, it all but guarantees that the adjacent and aging Nokia property will be unusable for any residential projects, due to its proximity to said datacenter. *In contrast*, if the datacenter is NOT built, it allows the possibility of an additional 325 new homes, using a density like that of the current Naper Commons development. The potential tax revenue generated by 325 new homes is illustrated below:

	Full Phase 1A/2B	If Megaproject HB4058/SB1514	Full 325 Homes	Homes v. Data Center	Homes v. Data Center If Megaproject
Property Tax	\$ 634,848	\$ 281,053	\$ 3,981,965	\$ 3,347,117	\$ 3,700,912
Utility Tax	\$ 339,794	\$ 339,794		\$ (339,794)	\$ (339,794)
Sales Tax			\$ 296,075	\$ 296,075	\$ 296,075
Total Tax Revenue	\$ 974,642	\$ 620,847	\$ 4,278,040	\$ 3,303,398	\$ 3,657,193

Ultimately, residential development has greater potential for tax revenue than the proposed single building data center.

Risk of Data Center vs. Homes

Homes represent a far more stable and diversified source of tax revenue for the city. Relying on a single large entity as a primary revenue source exposes Naperville to significant financial risk should that entity's performance decline. In contrast, residential developments distribute the tax base across many homeowners, reducing dependency on any one source. Homes would insulate the city from fluctuations in the data center market, or potential downturns in the fledgling AI industry that could result in abrupt declines in tax revenue from the data center provider and risks of the AI bubble popping and tax revenue suddenly going away.

References

1. 2024 United States Data Center Energy Usage Report - Lawrence Berkeley National Laboratory is a U.S. DOE Office of Science national laboratory
https://eta-publications.lbl.gov/sites/default/files/2024-12/lbnl-2024-united-states-data-center-energy-usage-report.pdf?utm_source=substack&utm_medium=email
2. Uptime Institute Global Data Center Survey 2024- <https://datacenter.uptimeinstitute.com/rs/711-RIA-145/images/2024.GlobalDataCenterSurvey.Report.pdf>
3. Rethinking Load Growth 2025 - Duke University - Nicholas Institute for Energy, Environment & Sustainability- <https://nicholasinstitute.duke.edu/sites/default/files/publications/rethinking-load-growth.pdf>
Relevant associated work by the same lead author:
<https://www.powerpolicy.net/p/the-puzzle-of-low-data-center-utilization>
<https://www.linkedin.com/in/tylerhnorris/>
<https://www.woodmac.com/podcasts/the-energy-gang/can-we-add-giant-new-data-centers-to-the-grid/>
4. "How Illinois' privacy law is costing Chicago billions in data-center deals" - Crains Chicago Business - 9/23/2025 <https://www.chicagobusiness.com/technology/illinois-privacy-law-drives-ai-data-centers-away>
5. "This Is How the AI Bubble Bursts" – Yale Insights – 10/8/2025 - <https://insights.som.yale.edu/insights/this-is-how-the-ai-bubble-bursts>
6. "Hype Cycle for Artificial Intelligence 2025" - Gartner - 6/2025 - <https://www.gartner.com/en/documents/6579402>
7. "Riding the Gartner Hype Cycle: AI in 2025 vs 2024" - 6/26/2025 - Building Creative Machines - <https://buildingcreativemachines.substack.com/p/riding-the-gartner-hype-cycle-ai>
8. "Elon Musk xAI Importing Power Plant for New Data Center" – AI Business - 7/8/2025 - <https://aibusiness.com/data-centers/elon-musk-xai-importing-power-plant-for-new-data-center>
9. "The Evolution of Build Vs Buy - In Artificial Intelligence" – KPMG - <https://kpmg.com/uk/en/insights/ai/the-evolution-of-build-vs-buy.html>
10. "Tech OpenAI signs \$38 billion compute deal with Amazon, partnering with cloud leader for first time" - CNBC – 11/3/2025 <https://www.cnbc.com/2025/11/03/open-ai-amazon-aws-cloud-deal.html>
11. "Brian Costin: Gov. JB Pritzker appointees' plan shifts a mega property tax burden onto you" – The Center Square – 10/24/2025 – <https://www.chicagotribune.com/2025/10/07/opinion-illinois-mega-projects-property-taxes/>
12. "Critics warn Illinois' 'megaproject' tax breaks shift costs to taxpayers" – Chicago Tribune – 10/7/2025 - https://www.thecentersquare.com/illinois/article_a0179677-4606-4e96-acdf-2a3fbc027422.html

About the Author

James Butt has over 30 years' experience designing, testing, and implementing resilient and secure architectures for networks, data centers, application deployments, and software. He started his career in 1994 as the co-founder and CTO of MidWest Communications, a regional internet, telephone, and colocation provider across 9 states. James was co-founder of the Iowa Internet Providers association. In 2000 he moved into a consulting role assisting organizations build and secure global IT infrastructures. James has been with Nexum since 2004, and directs Nexum's managed services offerings, internal IT, and ensures that Nexum's best-of-breed technology selections are made based on actual testing and verification. James designed Nexum's managed security services (MSSP division) standards, processes, procedures, and much of the technology back-end.

Kopinski, Sara

From: Iwicki, Brad
Sent: Friday, November 14, 2025 12:31 PM
To: Kopinski, Sara
Subject: FW: PZC Letter - DEV - 0057-2025
Attachments: PZC Letter.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

POD - Data Center public comment

Brad Iwicki

Assistant Planner | Planning & Development – TED Business Group City of Naperville | 400 S. Eagle St. Naperville, IL 60540

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-----Original Message-----

From: [REDACTED]
Sent: Friday, November 14, 2025 12:13 PM
To: Planning <Planning@naperville.il.us>
Cc: 'Bud Rein' [REDACTED]
Subject: PZC Letter - DEV - 0057-2025

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DO NOT click links or open attachments unless you confirm the incoming address of the sender and know the content is safe.

Please find attached a letter regarding the Karis Critical Data Center the subject of which is to be discussed at the November 19, 2025, Naperville Planning and Zoning Commission meeting. I would appreciate it if this letter was presented to the Commissioners for their review prior to the meeting.

Thanks.

Walter E. (Bud) Rein

[REDACTED]

[REDACTED]

[REDACTED]

Naperville, IL 60563

Dear Naperville Planning & Zoning Commissioners,

At the end of the November 5th PZC meeting, Russ Whitaker of Rosanora & Whitaker, Ltd and representing the Karis Data Center project, asserted that the public was uninformed regarding the proposed safeguards and mitigations that Karis has proposed for the project. In fact, Mr. Whitaker trivialized the reaction of the public to the real hazards posed by the data center to the public's concerns regarding additional traffic when the Naper Commons development was proposed saying that that fear was not realized and that "it all worked out". Mr. Whitaker stated that the safeguards and mitigations proposed by Karis adequately addressed the health, environmental, electrical, water, and diesel fuel hazards posed by the project thereby rendering the facility safe for construction in the Office, Research, and Industrial (ORI) zone and adjacent to five residential neighborhoods, a Meditation Center, a sensory garden playground for autistic children, a Montessori School, and numerous ecological environments including ponds and forest preserves.

I must respectfully and vigorously contest this position.

The evidence, drawn from engineering analyses, environmental impact assessments, and precedents from similar hyper-scale facilities, reveals profound gaps in these mitigations. Moreover, the nascent nature of hyper-scale data center operations leaves us without reliable long-term data to define "safe" thresholds or best practices, turning this project into an unacceptable experiment on our community. Below, I outline the key inadequacies, grounded in specific project details and broader industry realities.

1. Health Hazards: Unmitigated Risks to Vulnerable Populations

The site's proximity—mere hundreds of feet from homes, parks, a school, and a meditation center—amplifies health concerns that current mitigations fail to blunt. Mr. Whitaker touts noise barriers and "low-decibel" cooling systems, yet independent acoustic modeling (e.g., from the EPA's noise guidelines) indicates that even with these, operational hum from 100+ HVAC units could exceed 55 dBA at property lines, akin to chronic highway exposure. This disrupts sleep, elevates stress hormones, and impairs cognitive function—effects documented in studies from the World Health Organization on industrial noise near schools, where children's learning scores drop by up to 10%.

Electromagnetic fields (EMF) from high-voltage transformers and cabling pose another under addressed threat. While the project promises shielding, no peer-reviewed monitoring plan exists for chronic low-level exposure, which the International Agency for Research on Cancer classifies as "possibly carcinogenic." For the Meditation Center, where users seek quietude for mental health, this intrusion borders on the profane. Mitigations like vegetative

buffers are laughably insufficient against 24/7 operations; real safeguards would require a 1,000-foot setback, not the proposed cosmetic landscaping.

2. Environmental Hazards: Irreversible Strain on Local Ecosystems

Naperville's ORI zoning was never intended for facilities devouring resources at this scale—up to 200 MW of power and 1.5 million gallons of water daily for cooling. Proponents claim "closed-loop" systems and rainwater harvesting will suffice, but these are unproven at hyper-scale. The U.S. Geological Survey reports that data centers already consume 2-3% of U.S. electricity, exacerbating climate emissions; Karis's projected 1.2 million metric tons of annual CO₂ (from grid draw and backups) dwarfs local offsets like tree plantings.

Adjacent parks and the DuPage River watershed face desiccation risks. Water recycling efficiency hovers at 70-80% in best-case pilots (per Lawrence Berkeley National Lab), meaning 300,000+ gallons of "waste" water daily could leach contaminants into groundwater. No contingency for droughts - Illinois saw 20% reservoir drops in 2023 - is outlined, ignoring the 2024 DuPage County water stress index. This isn't mitigation; it's deferred catastrophe, endangering biodiversity.

3. Electrical Hazards: Grid Overload Without Redundancy

The argument for "smart grid integration" ignores ComEd's own modeling, which flags a 15-20% peak load spike from Karis, risking brownouts during heatwaves (as in Illinois' 2022 grid alerts). Backup diesel generators - up to 24 units - promise "clean burn" tech, but failures in Texas' 2021 freeze exposed how these overwhelm circuits, causing surges that fry residential appliances miles away. No microgrid isolation or community-wide surge protectors are funded, leaving 5,000+ adjacent households as unwitting buffers. In an ORI zone buffered by residences, this violates NESC electrical safety codes mandating fail-safes for high-density neighbors.

4. Water and Diesel Fuel Hazards: Spill Risks and Chronic Pollution

Water demands alone could spike Naperville's per-capita use by 5%, straining the Lake Michigan intake amid growing shortages (Illinois EPA's 2025 advisory). Mitigations like "zero-discharge" evaporative towers falter in humid Midwestern summers, according to DOE reports.

Diesel storage—millions of gallons on-site—evokes BP Deepwater-scale nightmares, yet spill containment is a mere double-walled tank without seismic or flood modeling (Naperville's flash-flood history). A 2023 EPA fine against a Virginia data center for 10,000-gallon leaks underscores the inadequacy; fumes alone could trigger asthma flares in schoolchildren, per CDC data showing 25% higher rates near industrial sites. "Rapid

response" protocols are no substitute for prevention, especially adjacent to a neighborhood and sensory parks and a meditation center where air quality is sacrosanct.

Weighing Long-Term Knowledge: An Uncharted Gamble

Fundamentally, we lack the data to deem any hyper-scale data center "safe." Unlike established industries like refineries (decades of EPA oversight), hyper-scalers like Karis represent a 2020s phenomenon - facilities 10x larger than 2010s predecessors, with AI-driven loads doubling every 18 months (per IEA forecasts). Long-term studies? Nonexistent. A 2024 MIT review of 50 U.S. data center sites found 40% exceeded modeled emissions within five years due to "usage creep," with no baselines for cumulative effects like soil salinization from brine discharge or psychological tolls from constant infrastructure presence.

Best practices are aspirational, not proven: "Green" certifications like LEED ignore lifecycle impacts, and voluntary reporting (e.g., via RE100) lacks enforcement. In Naperville, without 10–20-year post-construction monitoring—funded by developers, not taxpayers—we're flying blind. Precedents in Loudoun County, VA, show initial mitigations failing after three years, with resident lawsuits over unpredicted noise and water hikes. Will there be lawsuits in Auroa? My guess is that there will be. Why impose this on a community prized for livability, when zoning allows relocation to true industrial corridors?

In sum, the Karis mitigations are patchwork Band-Aids on a hemorrhage: under-engineered, untested, and oblivious to our human-scale surroundings. Approving this greenlights speculation over science, prioritizing corporate timelines over children's futures and ecological integrity.

I urge denial of the variance and a moratorium on hyper-scalers until federal standards emerge or perhaps Naperville adopts a Naperville Data Center Ordinance addressing the standards we want to see in place with any data center built in Naperville.

Let Karis build on our terms: secure, silent, sustainable.

Or let them take their data center to a cornfield or heavy industrial location.

Our parks, schools, and health demand no less.

Vote YES to modern standards. Vote NO to DEV-0057-2025 until they meet them.

Sincerely,

Bud Rein

Naperville Resident and Advocate for Sustainable Development

Kopinski, Sara

From: Egner, Therese
Sent: Monday, November 17, 2025 8:26 AM
To: Kopinski, Sara
Subject: FW: Community Concerns Regarding Proposed Naperville Data Center

Importance: High

Hi, Sara! FYI – DEV-0057-2025

Therese Egner

Community Planner | Planning & Development - TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 420-4179 | egnert@naperville.il.us

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From: Mindy Robinson [REDACTED]
Sent: Monday, November 17, 2025 8:18 AM
To: Planning <Planning@naperville.il.us>; Wehrli, Scott [REDACTED] Wilson, Nate
<[REDACTED]> White, Benny <[REDACTED]> Syed, Ashfaq <[REDACTED]>
McBroom, Josh <[REDACTED]>; Jain, Supna <[REDACTED]> Holzhauer, Ian
[REDACTED] Kelly, Patrick <[REDACTED]>
Subject: Community Concerns Regarding Proposed Naperville Data Center
Importance: High

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Dear Planning Team and Council Members

I am writing to express my strong opposition to the proposed data center development in Naperville. While I understand the growing need for digital infrastructure, placing a facility of this scale in such close proximity to residential areas and the Sensory Garden Playground raises several significant concerns that I urge the City to consider carefully.

Environmental Impact

Data centers are resource-intensive facilities that generate considerable heat, require constant cooling, and often rely on large backup generators. These operations can negatively affect the surrounding natural environment, degrade air quality, and reduce the ecological integrity of nearby green spaces. Naperville has long prioritized sustainability and outdoor recreation, and this project stands in direct conflict with those values.

Strain on the Electrical Grid

Data centers consume massive amounts of electricity—often more than entire neighborhoods. Introducing a high-demand facility to the area risks placing further strain on the local grid, increasing the likelihood of outages and the need for costly infrastructure upgrades that taxpayers ultimately bear. At a time when residents and businesses depend heavily on reliable electricity, adding such an energy-intensive operation is an unnecessary gamble.

Noise Pollution

Cooling towers, industrial fans, and backup generators associated with data centers create persistent mechanical noise that can affect nearby communities. Unlike typical commercial noise, these sounds run 24/7 and can significantly reduce quality of life for residents and visitors. The disruption is especially concerning given the proximity to a recreational and therapeutic environment like the Sensory Garden.

Air Pollution

Backup generators—often powered by diesel—emit particulate matter and other pollutants that pose risks to human health. Frequent testing cycles for these generators alone can introduce recurring spikes in emissions. This air pollution is particularly problematic in an area used by children, families, and individuals with sensory sensitivities who benefit from clean, calm outdoor spaces.

Impact on the Sensory Garden Playground

The Sensory Garden provides a peaceful, nature-centered space designed to support children and adults with sensory needs. Increased noise, vibration, traffic, and air pollution directly undermine the therapeutic purpose of this community asset. The garden's atmosphere is essential to its mission, and the presence of an industrial-scale data facility would erode the environment it relies on.

For these reasons, I respectfully urge the City to reject the proposed data center or seek an alternative location that does not compromise environmental quality, community health, or the well-being of one of Naperville's most meaningful recreational spaces.

Thank you for your time, consideration, and continued commitment to preserving the character and livability of our community.

Sincerely,
Mindy Robinson

Community Member

Kopinski, Sara

From: Egner, Therese
Sent: Monday, November 17, 2025 9:55 AM
To: Kopinski, Sara
Subject: FW: No On the Karis Critical Data Center

Hi, Sara! FYI – DEV-0057-2025

Therese Egner

Community Planner | Planning & Development - TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

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From: Jennie Eber [REDACTED]
Sent: Monday, November 17, 2025 9:19 AM
To: Planning <Planning@naperville.il.us>
Subject: No On the Karis Critical Data Center

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Dear Planning Commission,

Please vote no on the Karis Critical Data Center. The center will not create any long term positive effects on Naperville, the opposite will be true. Data centers drive up the cost of energy for the residents of the community, use more than their share of natural resources like water for cooling equipment, and strain the increasingly taxed energy grid. This project would harm the environment and residents of Naperville. It will drive down property values and drive away residents. Please vote no.

Best,
Jennie Eber,

Naperville Resident

Kopinski, Sara

From: Egner, Therese
Sent: Monday, November 17, 2025 11:01 AM
To: Kopinski, Sara
Subject: FW: In re Karis Critical Data Center
Attachments: In re Karis Critical Data Center - Letter From E. Cruz (11-17-25).docx

Follow Up Flag: Follow up
Flag Status: Completed

Hi, Sara! FYI – DEV-0057-2025

Therese Egner

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From: Edwin Cruz <[REDACTED]>
Sent: Monday, November 17, 2025 10:55 AM
To: Planning <Planning@naperville.il.us>
Subject: In re Karis Critical Data Center

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Dear Planning and Zoning Commission Members:

Please see attached for written comments in advance of the meeting scheduled for Wednesday, November 19, 2025.

Thanks,

November 17, 2025

Planning and Zoning Commission
City of Naperville
400 S. Eagle Street
Naperville, IL 60540

Re: Karis Critical Data Center

Dear Planning and Zoning Commission Members:

By my count, I am one of only four practicing attorneys who live in the Naper Commons community. This is in stark contrast to the 25 or so physicians who live there, and who have contributed so much of their time and efforts to advocating for us regarding this Karis data center proposal. Given my profession, I have likely drawn a bit of angst and bewilderment from my neighbors as to why I have not yet put my imprint on this hotly contested issue, which they feel could have catastrophic consequences for us. The reason for my silence until now is that, like any other issue I encounter, I wanted to do my independent assessment of the underlying facts and see both sides instead of quickly jumping to conclusions and blindly following others. I have now been able to complete my analysis, and the result is a resounding affirmation that the proposed data center should not proceed.

At the November 5th hearing, I watched four hours of thoughtful, substantive, and specific arguments in favor of rejecting Karis' proposal, from both Naper Commons residents and non-residents alike. I will not repeat the many well-reasoned arguments already presented. I do, however, want to address the two responses I heard from Karis' counsel at that hearing, which were that (i) there was a lot of misinformation being circulated, and (ii) risk does not equal hazard.

Admittedly, I have some sympathy for counsel's first point. In this age of digital media, concerns associated with anything (but especially medical-related topics) can quickly get blown out of proportion as information gets widely disseminated and its accuracy diluted (e.g., I recently saw an article headline that read "Is ginger more effective at curing cancer than chemo?"). Some of this distortion of information has inevitably happened here, but not to the point where it has diverged from the main argument, which is that data centers pose serious health risks when built in close proximity to residential areas. There is nothing inaccurate about that statement. In fact, Karis' counsel concedes that there is such risk in his second point, which I have much less sympathy for.

The presentations by the physicians at the November 5th hearing – Dr. Shah's in particular – did an excellent job at showing why risk does in fact equate to hazard. The evidence from the studies cited in those presentations unequivocally demonstrate that diesel emissions led to cancer and other harmful outcomes, including death. Responding to these physicians' logical, scientific, and research-based presentations with a generalized statement that risk does not equal hazard does not only do their work a disservice, but it is also unresponsive.

At the upcoming November 19th meeting, Karis' counsel intends to present an environmental systems engineer to discuss environmental impacts associated with this specific proposed Karis data center, noting that the presentations at the November 5th meeting were based on general information regarding other data centers around the country. While I can concede the generic argument, I certainly cannot accept the contention that the proposed Karis data center will not be harmful to residents simply because emission levels will fall under certain regulatory standards. Simply put, our regulators are not yet smart enough about the long-term environmental and health effects of these data centers to knowledgeably enact rules about them. History reminds us that regulators once allowed smoking on airplanes – proof that standards often

lag behind science. Dr. Shah's presentation showed that one inhalation of these fumes could very well be enough to cause harm, and that there is data that suggests the same.

Being on the frontlines, I can see that your decision will have irreversible ramifications for hundreds of people, either subjecting them to these serious health risks or forcing them to leave what most of them (including me) believe is their forever home. For this reason, if you have not already done so, I implore you to take the time, like I did, to do some independent analysis and come to your own conclusion.

In my profession, I can almost always predict where the chips will fall by following the money, so I recognize the challenges that you face. I do hope that this time is the rare exception where people like you can see that their constituents and their health are more important than the dollars. When you took office, you took an oath to support the Constitution of the United States and the Constitution of the State of Illinois. Your oath reflects a commitment to safeguard the health and well-being of residents – a responsibility that outweighs financial considerations. This is your opportunity to prioritize public health and set a precedent for responsible development. We are depending on you to make the decision that protects our community.

Sincerely,

Edwin M. Cruz

To: Linda Scotti

From: Charles Vidich, MCP, SM

Subject: Basis for Denial of the Karis Critical Data Center

Naperville Zoning Ordinance indicates planning and zoning commission and any decision by the City Council must address recommendations based on evidence and findings:

1. Establishment, maintenance or operation of conditional use will not be **detrimental to or endanger public health, safety and general welfare**; and
2. Conditional use will **not be injurious to the use and enjoyment of other property in the immediate area** for purposes already permitted, nor substantially diminish and impair property values within the neighborhood;
3. Establishment of the conditional use **will not impede normal and orderly development and improvement of adjacent property** for uses permitted in the district.
4. Establishment of conditional use is **not in conflict with adopted comprehensive master plan**.

Has the applicant for the data center met these conditions? Let's review the evidence provided by the applicant and compare it to the evidence submitted by various citizens and experts who have submitted testimony for why each of the four conditions has not been met.

Condition #1: Establishment, maintenance or operation of conditional use will not be **detrimental to or endanger public health, safety and general welfare**

Four Flaws in Applicant's Noise Reports as follows:

1. **Not Worst-Case Noise Conditions:** The noise analysis did not use worst case background noise conditions. Noise from traffic must rely on worst case background conditions to determine if estimated future noise levels conditions from the data center. According to the Jacob & Hefner noise study measurements of background noise were conducted between March 28, 2025, through April 1, 2025. This period does not reflect worst case traffic conditions. In the transportation planning world, traffic and noise are greatest during periods of high traffic volumes – typically before and after Labor Day and before and after Thanksgiving. Failing to address worst case background noise, inevitably undercounts background noise levels used in the consultant's noise modeling software.

2. **Manipulation of Background Noise Levels:** Jacob & Hefner acknowledged the following: “JHA did not average the data collected on Friday night and Saturday morning from meter location N2, on account of exceptionally loud readings. These readings lasted approximately 18 hours from 19:00-11:00. It is possible that loud noises were emanating from Warrenville Road and may be related to loud traffic or illegal mufflers. The removal of this data was deemed necessary since the unusually loud readings were not recorded in any of the other meters and they are unlikely to be representative of the typical background readings.” The removal of evidence to fit the consultant’s conception of what constitutes background noise represents a breakdown in the scientific method. If the consultant believed the five-day noise sampling period was not representative, were they shopping for “background levels” that fit their client’s interests? The consultant provided no evidence that could confirm the high noise levels that were removed from the noise study were also not found on other five-day periods. When attempting to determine maximum possible noise generated by a data center, the goal is not to select background levels when traffic levels are low – the goal of Naperville should be determining worst case noise conditions. The applicant’s consultant has not addressed the need for a worst-case noise scenario.
3. **Lack of Noise Specifications for Chillers and Data Servers:** The noise characteristics of the proposed chillers were never included in the Karis Critical Data Center noise study. Without noise specifications for the chillers, it is not possible to determine if the applicant has properly represented the anticipated noise from the data center. The Carlson Design Group memo dated October 14, 2025, does not address this critical noise specification for the proposed chillers. Similarly, the Jacob & Hefner noise study does not include the noise specifications of the Chillers. Furthermore, the noise generated by the data servers inside the proposed buildings is conspicuous by their absence from the Jacob & Hefner noise study. Without this information it is not possible to determine if the basic input variables for noise represents the future noise levels at the proposed site.
4. **No Analysis of Blackout or Brownout Scenarios:** The Jacob & Hefner noise report does not address the potential worst-case scenario when Naperville or portions of Naperville experience a blackout or brownout condition. Data centers require 24/7 reliability. With massive increases in electrical power required to serve data centers, the electric grid becomes more vulnerable to failure conditions. If the Illinois Municipal Electric Agency (IMEA), electric utility serving Naperville, has a blackout or brownout condition, all 24 electric generators will be activated. Jacob & Hefner chose not to model noise conditions under this scenario. Blackouts and brownouts are not merely a function of grid overload scenarios, they also represent threats

posed by hackers, third world terrorists and rogue nations seeking ransom monies for restoration of service. It is not a question of if a blackout or brownout will occur. It is a question of when. Naperville should understand and be aware of this worst-case noise scenario.

5. **Conclusion:** The applicant has not proven its noise study will not be detrimental to or endanger public health, safety and general welfare.

Condition #2: Conditional use will not be injurious to the use and enjoyment of other property in the immediate area for purposes already permitted, nor substantially diminish and impair property values within the neighborhood.

1. **Noise and Property Value Impacts on Meditation Center:** The applicant has failed to address the noise and property value impacts that will occur to the Science of Spirituality Center across the street in Lisle. The SOS Center is a church where meditation and quietude are essential to the function of that church. Indeed, the Jacob & Hefner noise study failed to include the SOS Center as one of the key noise receptors that will be impacted by the proposed data center.
2. **Lack of Intermunicipal Analysis in the Noise Study:** Noise does not recognize municipal boundaries. The SOS Center property is about 250 feet from the nearest proposed data center. The noise impacts to this facility have not been addressed.
3. **Intermunicipal Notification of Impacted Properties in Lisle:** The applicant or the applicant's consultant should have notified the SOS Center of the proposed data center. It is not clear that this intermunicipal notification took place as required by Naperville's zoning ordinance.
4. **Noise Impacts on Residential Neighborhood:** Data centers are not compatible with residential neighborhoods. Data centers generate low frequency noise that travels long distances. There is substantial evidence derived from other data center operations in other parts of the United States, including Aurora, Illinois, that confirms the serious noise disruptions caused by these facilities. The noise threats from data centers cannot be properly evaluated with the A weighted decibel scale and even the octave band analysis conducted by Jacob & Hefner falls short of the mark due to the faulty noise sampling procedures and failure to provide equipment specific noise specifications. As a result, neighborhood noise impacts have not been properly addressed.
5. **No Property Value Assessment:** The applicant did not complete an assessment of property value impacts associated with comparable data centers in Illinois (244), Virginia (666) or Texas (411).¹ These three states have a combined total of 1,321 data

¹ Data Center Map, [USA Data Centers](#), Accessed November 17, 2025.

centers. Given this large inventory of existing data centers, the applicant should have provided relevant property value data to convince Naperville that there will be no property value impacts. No such study has been presented.

Condition #3: Establishment of the conditional use will not impede normal and orderly development and improvement of adjacent property for uses permitted in the district.

1. **Data Center Weakens Neighborhood Stability:** An important purpose of land use planning is to separate incompatible uses. Data centers are not compatible with uses adjacent to a residential neighborhood with small children and where children make extensive use of outdoor events and activities near to the proposed data center. Naperville has invested significant time and energy to create a model residential neighborhood that has created a sense of community and trust amongst residents. While it may be possible to reduce A weighted decibel scale noise generated from the proposed data center – a noise typically within the range of human hearing – data centers also create low frequency noises that cannot be heard (i.e., it has vibratory impacts) nor mitigated with noise barriers. Low frequency noises can travel miles. The solution is to locate data centers far from residential zones – not adjacent to residential neighborhoods. If the proposed data center is approved, there will be an exodus from the adjoining residential neighborhood. That is the testimony of several residents who spoke at the recent public hearing. For those who decide to stay, there may be interest in pursuing litigation due to concerns with the impact of the data center on the value of their nest egg.

Condition #4: Establishment of conditional use is not in conflict with adopted comprehensive master plan.

1. **Data Center Inconsistent with the comprehensive Master Plan:** The future land use plan for the proposed site of the data center is identified as suitable for medium density residential development. The Plan indicates that several “supporting uses” are allowed in areas planned for medium residential development including Home-Based Businesses, Schools/Childcare Facilities, Accessory Dwelling Units, Places of Worship and Parks & Open Space. Conspicuous by its absence is any reference to data centers (see page 39 of the Comprehensive Master Plan).

Conclusions: The proposed Karis Critical Data Center application fails to meet all four of the conditions required for approval by the Naperville Planning and Zoning Commission. The focus of this analysis rests on the flaws and deficiencies in the noise study and the

impact that noise has on property values, and the public health, safety and general welfare of the residents of the abutting residential neighborhood. In addition, the applicant failed to address the inter-municipal impacts of the proposed development on the Science of Spirituality Center – a place where noise poses significant adverse impacts on the peace and quiet of those using that facility for prayer and meditation. Intermunicipal impacts to the Village of Lisle were not addressed by the applicant despite the proposed site's location across the street from the Village of Lisle. The Naperville Planning and Zoning Commission has sufficient grounds to deny the application submitted for the Karis Critical Data Center.

Kopinski, Sara

From: Egner, Therese
Sent: Monday, November 17, 2025 2:22 PM
To: Kopinski, Sara
Subject: FW: Proposed Data Center Questions

Follow Up Flag: Follow up
Flag Status: Flagged

FYI – DEV-0057-2025

Therese Egner

Community Planner | Planning & Development - TED Business Group
City of Naperville | 400 S. Eagle St. Naperville, IL 60540
(630) 420-4179 | egnert@naperville.il.us

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From: John Dombrowski <[REDACTED]>
Sent: Monday, November 17, 2025 2:18 PM
To: Planning <Planning@naperville.il.us>
Subject: Proposed Data Center Questions

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Attention Planning And Zoning Commission of Naperville;

If the PZC is to truly due its required due diligence and report accurately to the citizens of Naperville, here are a few questions that must be answered by the Karis rep and by the Naperville Planning And Zoning Commission.

- 1) Have any NDA's been signed by any member of the PZC regarding this proposed Data Center project ? If so, who signed them?
- 2) Who will be the legal operator of the data center ? (note that any 'LLC' only serves to insulate the property owner from liabilities and does nothing to protect the City or the Citizens).
- 3) What monthly water quantity will be used by the data center, both for the proposed cooling system and for the "alternate" cooling system if the proposed system proves insufficient?
- 4) How many diesel generators are propose and at what capacity/size (Kva) ?
- 5) What will be the total design electric load for the data center excluding any back up generators?
- 6) What tax incentives will be granted to the owner or operator ? OR; what annual taxes will be paid to the city of Naperville?
- 7) Will the Naperville Fire Department be required to expand its staff or add any equipment or be required to get any additional training to fight a data center fire ?
- 8) What fire suppression system will be used in the data center ? Where will the fire suppression system product be stored ?

Thank you in advance for answering these questions,
John Dombrowski

Kopinski, Sara

From: Iwicki, Brad
Sent: Tuesday, November 18, 2025 9:40 AM
To: Kopinski, Sara
Subject: FW: Data Center

POD – Data Center public comment

Brad Iwicki

Assistant Planner | Planning & Development – TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 305-7021 | iwickib@naperville.il.us

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From: [REDACTED]
Sent: Monday, November 17, 2025 7:10 PM
To: Planning <Planning@naperville.il.us>
Subject: Data Center

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I cannot be at the meeting but would like to communicate my concerns:

- will Naperville residents power bill go up?
- what chemicals are put in the water for cooling and will they stay in our water supply?
- how will it be powered?
- how many jobs will this guarantee based on many companies starting to use robots?
- will the greater need for power by a data center contribute to black-outs for residents?
- will the answers to these questions be legally binding in a contract for Naperville?

Thank you.

Kris Feddor

Kopinski, Sara

From: Iwicki, Brad
Sent: Tuesday, November 18, 2025 5:02 PM
To: Kopinski, Sara
Subject: FW: Comment about data center

POD – Data center public comment

Brad Iwicki

Assistant Planner | Planning & Development – TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 305-7021 | iwickib@naperville.il.us

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From: Giles Bruce <[REDACTED]>
Sent: Tuesday, November 18, 2025 4:19 PM
To: Planning <Planning@naperville.il.us>
Subject: Comment about data center

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Hello-

I live in unincorporated Naperville in one of the neighborhoods near the proposed data center.

I wanted to share an interesting article about data centers and two points that stuck out:

<https://www.newyorker.com/magazine/2025/11/03/inside-the-data-centers-that-train-ai-and-drain-the-electrical-grid>

"An analysis by Bloomberg estimated that, in areas near data centers, wholesale electricity costs have risen by more than two hundred per cent in the past five years."

"Data centers also cause local pollution. Elon Musk's xAI has built a natural-gas-powered data center in Memphis, near the Black neighborhood of Boxtown. The area, which already had the highest rate of emergency-room visits for asthma in Tennessee, saw levels of nitrogen dioxide, which exacerbates the condition, spike as much as nine per cent after the plant moved in."

I have four kids, and my older two have dealt with asthma. My younger two are 1 and 3, and the three houses next to us have four kids 4 or younger (with another on the way). I worry about the potential of pollution to affect their developing lungs.

I understand the need for data centers in today's economy but I wonder if it is wise to put one so close to so many homes with young children.

Thanks for your time,
Giles Bruce

Kopinski, Sara

From: Iwicki, Brad
Sent: Friday, November 21, 2025 12:10 PM
To: Kopinski, Sara
Subject: FW: Naperville data center.

POD – Data Center follow up comment

Brad Iwicki

Assistant Planner | Planning & Development – TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 305-7021 | iwickib@naperville.il.us

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From: Timothy Eads [REDACTED]
Sent: Thursday, November 20, 2025 9:19 PM
To: Planning <Planning@naperville.il.us>
Subject: Naperville data center.

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Hello,

I'm deeply dissatisfied and extremely disappointed on the outcome of the data center which was ruled by the 9 of you 8-1. Besides Courtney N, all of you are absolutely tone deaf and have completely sold out your community.

When the homeowners and their families in the surrounding areas start having medical issues that are directly in correlation to that data center, that blood is on your hands.

Have the future you deserve.

Kopinski, Sara

From: Iwicki, Brad
Sent: Friday, November 21, 2025 12:10 PM
To: Kopinski, Sara
Subject: FW: DEV-0057-2025 : Thank you Commissioner Courtney Naumes

POD – Data Center follow up comment

Brad Iwicki

Assistant Planner | Planning & Development – TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 305-7021 | iwickib@naperville.il.us

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From: Hammy hotmail Cha [REDACTED]
Sent: Friday, November 21, 2025 9:34 AM
To: Planning <Planning@naperville.il.us>
Subject: DEV-0057-2025 : Thank you Commissioner Courtney Naumes

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Hello PZC

I just wanted to thank Commissioner Courtney Naumes for voting "no". I am disappointed by the overwhelming support by the PZC for the proposal. After attending three of the four data center proposal meetings, it seemed clear to me that Kairos is primarily interested in enriching themselves at the expense of Naper Commons men, women, & children.

"Your systems are perfectly designed to get the results that you are getting."

- Stephen R. Covey

Thank you Commissioner Courtney Naumes for prioritizing the people of Naper Commons and the welfare of Naperville residents.

Have a joyful Thanksgiving everyone.

The Naperville Planning and Zoning Commission voted 8-1 in favor of a controversial data center proposal Wednesday evening, marking the fourth and final commission meeting on the topic.

...

Commissioner Courtney Naumes was the sole 'no' vote against the data center. While Naumes acknowledged Karis' efforts – including their stewardship pledge – to address resident concerns, Naumes ultimately felt that the pledge did not do enough to mitigate resource consumption or noise and health-related impacts.

"The general area is comprised of neighborhoods, parks, forest preserves, low intensity commercial use," Naumes said. "I believe it makes the proposed use out of character and creates potential adverse effects on the nearby properties."

Other commissioners, however, felt that Karis had done enough to demonstrate that they can responsibly integrate the data center with the surrounding community in a way that minimizes harm.

Hamilton Cha
Lisle, IL

Jesus said, "*Let the little children come to me, and do not hinder them, for the kingdom of heaven belongs to such as these.*" (Matthew 19:14)

"It is difficult to get a man to understand something, when his salary depends on his not understanding it." -
Upton Sinclair (author of "*The Jungle*", which exposed labor and sanitary conditions in the U.S. meatpacking industry)

Citizen Support Center (GovQA) Mayor/Council Submission

You are receiving this email to alert you that a new Mayor/Council submission has been created and assigned to you.

Contact Name: John DeCanto

Customer Name: john decanto

Email: [REDACTED]@m

Phone: [Phone]

Reference Number: W302522-112125

Create Date: 11/21/2025 1:01:03 PM

Status: Assigned

Request Type: Question/Concern

Description: No Data Center. Residents oppose the data center for a myriad of reasons you're already aware of. This is a re-election defining vote. Vote No.

Click the link below to review and/or respond to the submission.

[REDACTED]

Kopinski, Sara

From: Egner, Therese
Sent: Monday, November 24, 2025 8:38 AM
To: Kopinski, Sara
Subject: FW: New data center in Naperville

Hi Sara,

FYI – DEV-0057-2025

Therese Egner

Community Planner | Planning & Development - TED Business Group
City of Naperville | 400 S. Eagle St. Naperville, IL 60540
(630) 420-4179 | egnert@naperville.il.us

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From: Chuck Dolan <[REDACTED]>
Sent: Saturday, November 22, 2025 5:11 PM
To: Holzhauser, Ian <[REDACTED]>
Cc: Jain, Supna <[REDACTED]>; Syed, Ashfaq <[REDACTED]>; Gibson, Mary <[REDACTED]>; Kelly, Patrick <[REDACTED]>; McBroom, Josh <[REDACTED]>
White, Benny <[REDACTED]>; Wehrli, Scott <[REDACTED]> Planning <[REDACTED]>
Subject: New data center in Naperville

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Hello all,

I have been a resident of Naperville for 26 years and a retired teacher from Neuqua Valley High School. I love this city. I found out a new data center might be built by Naperville Road and Warrenville Road. I am worried about the noise and the pollution I have read these things put out. I think this should be built in a more outlying area and not right in the middle of where so many residents live.

Thank you for reading this.

Chuck Dolan



Kopinski, Sara

From: Egner, Therese
Sent: Monday, November 24, 2025 1:32 PM
To: Kopinski, Sara
Subject: FW: No "data center" at Naperville Danada area

Hi Sara, FYI – DEV-0057-2025

Therese Egner

Community Planner | Planning & Development - TED Business Group

City of Naperville | 400 S. Eagle St. Naperville, IL 60540

(630) 420-4179 | egnert@naperville.il.us

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From: S Dobson <[REDACTED]>
Sent: Monday, November 24, 2025 1:27 PM
To: Planning <Planning@naperville.il.us>
Subject: No "data center" at Naperville Danada area

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Dear Commissioners:

Regarding several members' mistaken vote to destroy a rare natural, peaceful area: I never knew this project proposal existed. The Lucent site is quiet and surrounded by families and greenery.

First: if a huge, water-guzzling diesel powered loud set of a billion engines is "proposed", the Commission needs to air that broadly and loudly to all nearby residents. Reading about some alleged "decision" 8-1 in the paper on a Friday with zero buy-in from the community is beyond unacceptable.

To Ms. Robbins: please do your job better, for all our sakes. If you and eight people "steward" this land, you are getting very far, indeed 180 degrees opposite, from your duties. No such "data center" belongs here, and you and we need to ensure the environment and healthy social aspects of this area remain free and protected.

Kudos to Commissioner Naumes for leading the way.

Let's be real: Ms. Robbins said 'there's some noise on I-88 sometimes, so let's simply let the entire town go to pot.' Nope. Let's do our jobs.

Thanks,
Shannon Pouran Dobson, Esq.

[REDACTED]

[REDACTED]

[REDACTED]

Citizen Support Center (GovQA) Mayor/Council Submission

You are receiving this email to alert you that a new Mayor/Council submission has been created and assigned to you.

Contact Name: Tony and Paula Loret de Mola

Customer Name: Tony Loret de Mola

Email: [REDACTED]@m

Phone: [Phone]

Reference Number: W303075-113025

Create Date: 11/30/2025 10:44:32 AM

Status: Assigned

Request Type: Feedback

Description: Data Center,
We urge the City council not to rush into allowing the data center to be built on the former Lucent site. We believe further research must be done to truly understand the impact on the community and the environment. Does the data center need to be this large? Are there alternative sites where the data center could be built that would not negatively impact those that live near the area? We urge the council to carefully consider these options and not rush forward with this proposal.

Click the link below to review and/or respond to the submission.

[REDACTED]

Citizen Support Center (GovQA) Mayor/Council Submission

You are receiving this email to alert you that a new Mayor/Council submission has been created and assigned to you.

Contact Name: Kathryn Camasto

Customer Name:

Email: [REDACTED]@t

Phone: [Phone]

Reference Number: W302607-112325

Create Date: 11/23/2025 1:50:33 PM

Status: Assigned

Request Type: Feedback

Description: Hello,
I wanted to weigh in on the proposed data center [at Warrenville Rd and Naperville Rd]. My vote would be NO on this data center in this location and also to table voting on any other proposed data centers in Naperville until there is more info on the ramifications on electric and water usage and noise pollution.

Thank you,
Kathryn Camasto
[REDACTED] Naperville 60540

Click the link below to review and/or respond to the submission.

[REDACTED]

Citizen Support Center (GovQA) Mayor/Council Submission

You are receiving this email to alert you that a new Mayor/Council submission has been created and assigned to you.

Contact Name: Ryan Loughlin

Customer Name:

Email:

[REDACTED]

Phone: [Phone]

Reference Number: W302580-112225

Create Date: 11/22/2025 1:05:31 PM

Status: Closed

Request Type: Question/Concern

Description:

Are all of you completely unaware of the negative effects of a massive data center? Have you not educated yourselves on the massively harmful effects of 24 diesel fuel powered generators? Do you not realize they will be routinely testing these generators and releasing toxic chemicals into our air? Are you ok with upsetting all of the people who live in that area? Are you aware of how loud it's going to be? There's literally not a single positive aspect of building this other than enriching yourselves and your friends. If you want to lose the trust of everyone who lives here, go ahead and approve it. I would suggest taking some time to actually do your jobs and show you care about more than a small amount of extra money for yourselves, or fulfilling whatever

favors you need to fulfill by approving this. Nobody wants this except the people profiting off this and you.

Click the link below to review and/or respond to the submission.



Citizen Support Center (GovQA) Mayor/Council Submission

You are receiving this email to alert you that a new Mayor/Council submission has been created and assigned to you.

Contact Name: Ashley Hutchinson

Customer Name:

Email: [REDACTED]@m

Phone: [Phone]

Reference Number: W302907-112625

Create Date: 11/26/2025 10:08:23 AM

Status: Assigned

Request Type: Question/Concern

Description:

Absolutely HORRIFIED that our city council is considering this data center. No other affluent suburb or city in the country has even entertained these (Carmel IN shut this down but we're considering it?). The damage, the hilarious lack of property tax income, the permanent damage to the land and the properties around it. Not to mention the immense drain on an electrical grid system I've bragged about to friends in other suburbs for years? As someone with a 7-figure home in Naperville and two young children, let me assure you that anyone who votes yes to this will be held accountable. On social media, online, in person. The disgusting back-doo agreements that have clearly happened to get this to city council already make me ill,

please consider how you vote carefully. We will hold you responsible. Aurora of all places won't let another one be built because it was such a horror on their community. Please do not degrade my huge property taxes for this.

Click the link below to review and/or respond to the submission.



Citizen Support Center (GovQA) Mayor/Council Submission

You are receiving this email to alert you that a new Mayor/Council submission has been created and assigned to you.

Contact Name: Carissa Deasy

Customer Name:

Email: [REDACTED]@m

Phone: [Phone]

Reference Number: W303719-120725

Create Date: 12/7/2025 7:51:30 AM

Status: Assigned

Request Type: Feedback

Description:

(resubmitting because I miscategorized it previously as a concern)

Dear Mayor Wherli and Members of the City Council,

I'm writing to voice my strong opposition of the proposed data center. The location is near my home, across the street from my office (BMO), and right by the DuPage Montessori school I will be sending my daughter too.

I'm sure you've already heard many various reasons why this development should be rejected. I'm sure I can't list them better than others already have, but I can tell you how it will affect me and my family.

I have asthma, and my husband and I moved to this place, surrounded by forest preserves, for my health and the health of our daughter. We've loved living here and I really cannot overstate how the clean and tranquil environment has helped me.

The data center would surely negate this and I fear my lungs would return to the sickly state they were in before we came here. I fear my daughter will develop the same problems I once had.

Please listen to the residents of Naperville. The Karis corporation is not your constituent.

Sincerely,
Carissa Deasy

Click the link below to review and/or respond to the submission.



Citizen Support Center (GovQA) Mayor/Council Submission

You are receiving this email to alert you that a new Mayor/Council submission has been created and assigned to you.

Contact Name: Carol Tritschler

Customer Name:

Email: [REDACTED]@m

Phone: [Phone]

Reference Number: W304045-121025

Create Date: 12/10/2025 2:10:58 PM

Status: Assigned

Request Type: Feedback

Description:

I am resident of Naperville and understand that you are voting soon on approval of rezoning for a data center in Naperville. I urge you to vote no. I am against having a data center here in Naperville due to exorbitant projected use of electricity and water and noise from generators and potential pollution. I am for energy conservation and renewable energy and this would offset residential gains in that area. Environmental organizations such as Food and Water Watch warn of expansion of fossil fuel mining and expedited EPA approval of forever chemicals for immersion cooling without appropriate oversight and more. We should be protecting good paying jobs for people vs. massive artificial intelligence data centers profiting billionaires. Please vote no and certainly not to expedited approval without adequate oversight. Thank you for

your service in Naperville City Council and for your consideration of this issue.

Click the link below to review and/or respond to the submission.



Citizen Support Center (GovQA) Mayor/Council Submission

You are receiving this email to alert you that a new Mayor/Council submission has been created and assigned to you.

Contact Name: Ashley Miller

Customer Name:

Email: [REDACTED]@m

Phone: [Phone]

Reference Number: W304094-121125

Create Date: 12/11/2025 7:55:17 AM

Status: Assigned

Request Type: Question/Concern

Description: I am asking that you vote no on the proposed data center. This is detrimental to the environment and the taxpayers of Naperville. No one here wants this, it will lead to increases in electricity bills and they use huge amounts of water. It also puts our local water ways at risk, causing harm to all the animals that call this area home. I ask that you vote no on this data center. It helps none of the citizens of Naperville.

Click the link below to review and/or respond to the submission.

[REDACTED]

Citizen Support Center (GovQA) Mayor/Council Submission

You are receiving this email to alert you that a new Mayor/Council submission has been created and assigned to you.

Contact Name: Gordana Bruck

Customer Name:

Email: [REDACTED]@m

Phone: [Phone]

Reference Number: W304083-121025

Create Date: 12/10/2025 8:18:57 PM

Status: Assigned

Request Type: Question/Concern

Dear Council Members,

Description:

I am writing as a concerned Naperville resident to state my strong opposition to the proposed data center. This project poses significant risks to our community's quality of life, including increased noise, heavy energy usage, strain on our infrastructure, and long-term environmental impacts. None of these align with the values or priorities of the families who call this city home.

Naperville deserves responsible development that strengthens neighborhoods—not an industrial-scale operation that offers minimal local benefit while creating

substantial burdens for the surrounding area.

I am asking you to vote AGAINST approving this data center. Please represent the interests of the residents who will be living with the consequences long after the race for the best AI is over.

I also want to be clear: your vote on this project will directly influence my support in future elections. If you choose to approve the data center, I will not be supporting you at the ballot box, and I will encourage my neighbors to consider representatives who prioritize community well-being over outside corporate interests.

Thank you for your attention to this matter. I hope you choose to stand with the residents of Naperville.

Sincerely,

Gordana Bruck

Click the link below to review and/or respond to the submission.



Citizen Support Center (GovQA) Mayor/Council Submission

You are receiving this email to alert you that a new Mayor/Council submission has been created and assigned to you.

Contact Name: SuAnn

Customer Name:

Email: [REDACTED]@m

Phone: [Phone]

Reference Number: W304139-121125

Create Date: 12/11/2025 2:47:47 PM

Status: Assigned

Request Type: Question/Concern

Description:

I am writing to express concern and I am asking you to vote no on the approval of the data center. There has been a strong push back by your community. It is easy to see why when you look at the negative impacts to the communities that have already been subject to these data centers. First, utility bills will sky rocket when people are already struggling to afford basic necessities. Second, the environmental impact of clean air and water is unacceptable. Third, in communities that already have data centers, they have seen a drop in property values. Last, trying to sell a data center as job creating is short sighted. There may be an initial increase in construction jobs, but in an affluent community such as Naperville where many children can still afford to go to school, these AI data

centers eliminate 32 percent of white collar entry level positions. A data center will work against the community of Naperville and will impact its standing as one of the best cities in the country to live.

Click the link below to review and/or respond to the submission.



Citizen Support Center (GovQA) Mayor/Council Submission

You are receiving this email to alert you that a new Mayor/Council submission has been created and assigned to you.

Contact Name: Phil Quill

Customer Name:

Email: [REDACTED]@m

Phone: [Phone]

Reference Number: W304125-121125

Create Date: 12/11/2025 12:51:57 PM

Status: Assigned

Request Type: Question/Concern

Description: We need to reject any of these I centers.
Naperville is renowned as one of the best family oriented city:towns in the cou
The extra tax dollars would come out if the home owners pockets in reduced re
their homes.

Click the link below to review and/or respond to the submission.

[REDACTED]
[REDACTED]

Citizen Support Center (GovQA) Mayor/Council Submission

You are receiving this email to alert you that a new Mayor/Council submission has been created and assigned to you.

Contact Name: Obaid Baig

Customer Name:

Email: [REDACTED]@m

Phone: [Phone]

Reference Number: W304352-121525

Create Date: 12/15/2025 11:52:21 AM

Status: Assigned

Request Type: Question/Concern

Description:

Dear Mayor and Members of the Naperville City Council,

I am a resident of the Naper Commons neighborhood, writing to formally and unequivocally oppose the proposed data center development planned near our community. I urge the City Council and Mayor's Office to vote NO on this project.

I live here with my wife and children. The scale and nature of this development present risks and impacts that are simply unacceptable for a residential-adjacent area—especially when so many of the long-term consequences remain uncertain or insufficiently addressed.

Data centers are not benign office buildings. They introduce significant and permanent concerns, including but not limited to:

Continuous operational noise from cooling systems and backup generators

Massive and ongoing power consumption with unknown long-term grid and environmental impacts

Heat output, light pollution, and visual industrialization of a residential corridor

Increased reliance on diesel generators and associated air-quality risks

Irreversible changes to neighborhood character and potential negative impacts on property values

What concerns me most is not just the known impacts—but the unknown ones. Once built, these facilities are permanent. If unforeseen issues arise years later, residents have no meaningful recourse. The burden of that risk is placed entirely on families who did not ask for this development and will not benefit from it.

Naperville is a city built on thoughtful planning, family-focused neighborhoods, and a high standard of quality of life. Allowing a large-scale data center next to established homes undermines those principles. This is not a case of opposing growth—it is about appropriate placement and protecting residents from industrial uses that do not belong near where children live, play, and grow up.

No amount of tax revenue justifies exposing families to long-

term risks that cannot be fully understood or undone. Once approved, this decision cannot be reversed.

For these reasons, I strongly urge you to reject this proposal and vote NO on the data center development near Naper Commons.

I appreciate your responsibility to safeguard the wellbeing of Naperville residents and hope you will put families and neighborhoods first in this decision.

Best
Obaid Baig
Naper Commons Resident

Click the link below to review and/or respond to the submission.



Citizen Support Center (GovQA) Mayor/Council Submission

You are receiving this email to alert you that a new Mayor/Council submission has been created and assigned to you.

Contact Name: Almothana Alhamoud

Customer Name:

Email: [REDACTED]@m

Phone: [Phone]

Reference Number: W304441-121525

Create Date: 12/15/2025 7:59:49 PM

Status: Assigned

Request Type: Other

Dear Members of the Naperville City Council,

Description:

I am writing as a concerned resident of Naperville to respectfully urge the City Council to oppose the current proposal to build a data center near Naper Commons and instead consider locating such facilities in areas farther from homes, parks, and community gathering spaces.

While I understand the importance of modern digital infrastructure, placing a large industrial data center adjacent to established residential neighborhoods raises significant quality-of-life, environmental, and safety concerns — many of which have been documented in recent local and national

reporting:

1. Noise and Pollution Concerns:

Data centers often require powerful cooling systems and backup generators that can emit constant noise — in some cases compared by residents to freight trains or helicopter-like sound levels — which can interfere with daily life and rest. Additionally, backup diesel generators contribute to air emissions and local air quality degradation, even during periodic testing.

2. Community Disruption and Resource Strain:

Large data centers consume enormous amounts of electricity and water. National and regional analyses show that these facilities place additional strain on local utility systems, potentially contributing to higher rates for residents and requiring infrastructure upgrades.

3. Environmental Impacts:

Independent reports highlight the broader environmental footprint of data centers, including increased greenhouse gas emissions, heavy resource consumption, and potential impacts on local ecosystems. These concerns resonate strongly with neighborhoods that value parks, green space, and environmental stewardship.

4. Community Opposition and Local Precedent:

Residents near the proposed site — including those in Danada Woods, Fairmeadow, and around Naper Commons — have actively expressed opposition, emphasizing that industrial uses should not be placed among homes, parks, schools, and areas with vulnerable populations.

Across the U.S., other municipalities (such as Chandler, AZ and College Station, TX) have reconsidered or rejected data center proposals due to similar concerns around noise, utility strain, and minimal long-term local benefits.

5. Property Values and Quality of Life:

Although data center impacts on property values vary by location, proximity to industrial developments like data centers can create perceived detriments to residential desirability.

For these reasons, I respectfully request that the City Council delay final approval of this proposal and pursue alternative sites zoned for industrial or commercial use that are not immediately adjacent to homes, parks, and community amenities. Doing so would demonstrate that Naperville values both economic progress and the long-term well-being of its residents.

Thank you for your thoughtful consideration of this important issue.

Sincerely,

Almothana Alhamoud

[Redacted signature block]

[Redacted line]

[Redacted line]

[Redacted line]

|

Citizen Support Center (GovQA) Mayor/Council Submission

You are receiving this email to alert you that a new Mayor/Council submission has been created and assigned to you.

Contact Name: Osama Elkhatib

Customer Name:

Email: [REDACTED]@m

Phone: [Phone]

Reference Number: W304392-121525

Create Date: 12/15/2025 3:29:02 PM

Status: Assigned

Request Type: Question/Concern

Description:

Please vote no on the data center project in north Naperville. I grew up in Naperville, attending Madison and Central, and am proud to call this city home. I recently moved back with my wife and 2 kids after living in Chicago for medical training. While schools and community are obvious reasons why we chose Naperville, safety is the most important. Which is the main reason why I am concerned about this data center. Regardless of the information presented by the builders, there are so many potential health risks to the very people you serve that warrants stopping this project. There's a reason health and environmental groups are asking for a moratorium on data centers. Thank you!

Click the link below to review and/or respond to the submission.

Citizen Support Center (GovQA) Mayor/Council Submission

You are receiving this email to alert you that a new Mayor/Council submission has been created and assigned to you.

Contact Name: Gordana Bruck

Customer Name:

Email: [REDACTED]@m

Phone: [Phone]

Reference Number: W304083-121025

Create Date: 12/10/2025 8:18:57 PM

Status: Assigned

Request Type: Question/Concern

Dear Council Members,

Description:

I am writing as a concerned Naperville resident to state my strong opposition to the proposed data center. This project poses significant risks to our community's quality of life, including increased noise, heavy energy usage, strain on our infrastructure, and long-term environmental impacts. None of these align with the values or priorities of the families who call this city home.

Naperville deserves responsible development that strengthens neighborhoods—not an industrial-scale operation that offers minimal local benefit while creating

substantial burdens for the surrounding area.

I am asking you to vote AGAINST approving this data center. Please represent the interests of the residents who will be living with the consequences long after the race for the best AI is over.

I also want to be clear: your vote on this project will directly influence my support in future elections. If you choose to approve the data center, I will not be supporting you at the ballot box, and I will encourage my neighbors to consider representatives who prioritize community well-being over outside corporate interests.

Thank you for your attention to this matter. I hope you choose to stand with the residents of Naperville.

Sincerely,

Gordana Bruck

Click the link below to review and/or respond to the submission.

[REDACTED]

[REDACTED]

|

Citizen Support Center (GovQA) Mayor/Council Submission

You are receiving this email to alert you that a new Mayor/Council submission has been created and assigned to you.

Contact Name: Kelsey Bauer

Customer Name:

Email: [REDACTED]@m

Phone: [Phone]

Reference Number: W304551-121625

Create Date: 12/16/2025 4:03:39 PM

Status: Assigned

Request Type: Feedback

I want to express my extreme opposition to the data center being built in Naperville.

Description:

I have lived in Naperville nearly my entire life and now am the mother to two small children, age 2 and 4. I have done a lot of research on data centers and have significant concerns about the health and environmental impacts they create.

As a mother, I want nothing more than to live in an area where my family is safe and protected from unwanted health impacts. The data center would create a major concern for our family. Please listen to Naperville's residents and vote against the data center.

Click the link below to review and/or respond to the submission.



Citizen Support Center (GovQA) Mayor/Council Submission

You are receiving this email to alert you that a new Mayor/Council submission has been created and assigned to you.

Contact Name: AH Hassaballah

Customer Name:

Email: [REDACTED]@m

Phone: [Phone]

Reference Number: W304351-121525

Create Date: 12/15/2025 11:48:38 AM

Status: Assigned

Request Type: Question/Concern

Description: Please Vote NO to the Karis Data center. Data centers are a drain on the welfare of the ecosystem and surrounding communities and relevant infrastructure for daily civil life. Thank you.

Click the link below to review and/or respond to the submission.

[REDACTED]

Kopinski, Sara

From: Planning
Sent: Wednesday, December 17, 2025 9:08 AM
To: Kopinski, Sara
Subject: FW: DATA CENTER CONCERNS

Hi Sara,

Forwarding you this POD email addressed to the mayor and council about the Data Center!

Best,

Isaac Marlott

Assistant Planner

Planning & Development - TED Business Group

City of Naperville | 400 S. Eagle Street | Naperville, IL 60540

Office: 630-420-4193 | marlotti@naperville.il.us

From: Char Desmond [REDACTED]
Sent: Monday, December 15, 2025 6:31 PM
To: Holzauer, Ian [REDACTED]; Syed, Ashfaq <[REDACTED]>; Wilson, Nate [REDACTED]; Gibson, Mary [REDACTED]; McBroom, Josh [REDACTED]; Kelly, Patrick [REDACTED]; White, Benny <[REDACTED]>; Wehrli, Scott <[REDACTED]>; Planning <Planning@naperville.il.us>; Longenbaugh, Allison <[REDACTED]>
Subject: Re: DATA CENTER CONCERNS

You don't often get email from [REDACTED]. [Learn why this is important](#)

CAUTION: This e-mail originated outside of the City of Naperville (@naperville.il.us).

DO NOT click links or open attachments unless you confirm the incoming address of the sender and know the content is safe.

Dear Mayor Wehrli and council members,

I am deeply concerned that you as elected officials are not listening to the citizens regarding the proposed Data Center! You were elected to represent the Voice of the people who put you in office. We do not want to live near a data center. This building should not be erected so close to residential areas and parks.

If Pulte builders disclosed the data center proposal for that land, we would never have bought here. We do not want the pollution. We do not want the noise and we do not want our property values or utilities affected by this.

I urge you to PLEASE VOTE AGAINST the data center on the corner of Warrenville Road and Lucent Lane.

Thank you,

Char Desmond

Naper Commons resident

Sent from my iPhone

On Aug 13, 2025, at 4:48 PM, Desmond [REDACTED] > wrote:

Dear Mayor Wehrli and Council members,

We are writing you to express our deep concern regarding the proposed Data Center near the Naper Commons development. We recently became residents of Naperville to enjoy our retirement years. The proposed Data Center presents serious concerns that threaten the character, safety and value of our nearby residential communities.

We align with councilman Ian Holzhauer to oppose the project and ask the remaining council members and Mayor Wehrli to reconsider their support for this proposal for the concerns noted above.

According to the Daily Herald, the proposed Data Center for Naperville is approximately 600,000 sf. The Bloomberg Report stated that a recent 200,000sf Data Center proposed for VA could use as much energy as 30,000 homes. How exactly will this affect us? Also, the report stated that Data Centers use more electricity than most countries. Noise and the cost of electricity are also concerns.

We did not move to Naperville in 2023 to be living adjacent to a Data Center and have our property value decline.

Please stand with the residents of Naper Commons and all those who care about protecting our investment and environment and vote NO on the Data Center project.

Charles and Charyn Desmond

Citizen Support Center (GovQA) Mayor/Council Submission

You are receiving this email to alert you that a new Mayor/Council submission has been created and assigned to you.

Contact Name: Amber Patel

Customer Name:

Email: [REDACTED]@m

Phone: [Phone]

Reference Number: W304291-121325

Create Date: 12/13/2025 1:14:34 PM

Status: Assigned

Request Type: Feedback

Description:

Dear Mayor and City Council Members,
I am writing to encourage you to vote no to the proposed Naperville Data Center. I do not believe that a data center belongs in our community at this time due to concerns regarding the negative effects of noise and air pollution on residents health and property values, effect on utility rates, the effect on the potable water available, and long term effects of living, working, and playing near a data center. We do not have enough assurances from reliable, unbiased sources at this time. These are my personal thoughts, but my thoughts are also echoed when I speak with other Naperville residents in our community- it's an overwhelmingly unpopular proposal that would result in so much distrust of you, Mayor

and Council Members, if you voted for the proposed data center. You work the the citizens of Naperville, and not for Karis.

Sincerely,
Amber Patel

Click the link below to review and/or respond to the submission.



Citizen Support Center (GovQA) Mayor/Council Submission

You are receiving this email to alert you that a new Mayor/Council submission has been created and assigned to you.

Contact Name: Alpana Dunn

Customer Name: Alpana Chaudhary Dunn

Email: [REDACTED]@m

Phone: [Phone]

Reference Number: W305311-122325

Create Date: 12/23/2025 12:11:14 PM

Status: Assigned

Request Type: Other

Description: Please do not approve the Karis Data Center in our community. You represent me, my children and my community. Do no make this your legacy. Instead make protecting the current and future residents of this great city your legacy. Please do not approve this!

Click the link below to review and/or respond to the submission.

[REDACTED]

Citizen Support Center (GovQA) Mayor/Council Submission

You are receiving this email to alert you that a new Mayor/Council submission has been created and assigned to you.

Contact Name: Ann E McConachie

Customer Name: Ann McConachie

Email: [REDACTED]@m

Phone: [Phone]

Reference Number: W306248-010526

Create Date: 1/5/2026 11:47:01 AM

Status: Assigned

Request Type: Question/Concern

Description: I am very concerned about the effect data centers have on communities and the environment. I am against them. I hope Naperville will not allow them in our city.

Click the link below to review and/or respond to the submission.

[REDACTED]

Citizen Support Center (GovQA) Mayor/Council Submission

You are receiving this email to alert you that a new Mayor/Council submission has been created and assigned to you.

Contact Name: Shahab Khan

Customer Name:

Email: [REDACTED]@m

Phone: [Phone]

Reference Number: W304344-121525

Create Date: 12/15/2025 10:29:16 AM

Status: Assigned

Request Type: Feedback

Description: Please vote NO on the Karis data center. Too close to homes. Build them away from homes. Please entice another project here. Thanks.

Click the link below to review and/or respond to the submission.

[REDACTED]

Citizen Support Center (GovQA) Mayor/Council Submission

You are receiving this email to alert you that a new Mayor/Council submission has been created and assigned to you.

Contact Name: Sara Gerliczki

Customer Name:

Email: [REDACTED]@m

Phone: [Phone]

Reference Number: W306884-011226

Create Date: 1/12/2026 7:01:57 AM

Status: Assigned

Request Type: Question/Concern

Description:

Good morning. My name is Sara Gerliczki, and I live with my husband, our 4 year old son, and my agin mom in Naper Commons.

When we chose to move here, one of the biggest reasons was the clean air and the forest preserves — a place where our family, and especially my young son with a chronic lung disease, could breathe easier and grow up healthy.

Now we've learned of the proposed data-center just beyond our neighborhood, near the old Nokia site off Warrenville Road. It would include 12 diesel generators. Diesel exhaust and fine-particle pollution are proven to harm lung health at

any level — especially for children and anyone with respiratory conditions. This is much closer to us than the highway.

Even the city's own master plan designates this area for future residential use, not heavy industrial. More houses are on the way and the parcel is designated as medium density residential - this should be a space for stores that people can use, not data centers that harm the environment.

Families moved here for peace, clean air, and nature. This project doesn't fit that vision — or the spirit of what this community was promised. I urge Mayor Wehrli and the Council to reject or pause this proposal until it can be located in a true industrial zone, away from homes and forest preserves.

Thank you,
Sara, Aron and Julian Gerliczki and Olivia Wallace

Thank you for your time and for protecting the health of families like ours.

Click the link below to review and/or respond to the submission.



Citizen Support Center (GovQA) Mayor/Council Submission

You are receiving this email to alert you that a new Mayor/Council submission has been created and assigned to you.

Contact Name: Shannon Smith

Customer Name:

Email: [REDACTED]@m

Phone: [Phone]

Reference Number: W306838-011026

Create Date: 1/10/2026 5:19:41 PM

Status: Assigned

Request Type: Service Request

Description: No data center, please.

Click the link below to review and/or respond to the submission.

[REDACTED]

Citizen Support Center (GovQA) Mayor/Council Submission

You are receiving this email to alert you that a new Mayor/Council submission has been created and assigned to you.

Contact Name: Abdul Hadi Muhammad

Customer Name: Abdul Hadi Muhammad

Email: [REDACTED]@m

Phone: [Phone]

Reference Number: W306806-010926

Create Date: 1/9/2026 6:37:48 PM

Status: Assigned

Request Type: Feedback

I rise today to urge you to reject the proposed data center near Naper Commons. On paper, this project looks like a private investment. But in reality, the costs—financial, environmental, and social—will be carried by the residents of Naperville.

Description: First, the electric grid. We are told that Karis Critical will pay for 100% of upgrades to the Indian Hill Substation to support this new data center. But substations are not isolated islands; they are part of a distributed, interconnected network. If one substation goes down or becomes overloaded, the strain shifts to neighboring substations, rippling through transmission lines, transformers, and the entire grid. In other

words, the impact of this project won't stop at the Indian Hill Substation. It will cascade across Naperville's electric system, and the costs of reinforcing that system will ultimately fall on residents.

Second, the scale of demand. This is a 36-megawatt facility. The average Naperville household uses 844 kilowatt-hours per month. That means this one data center will consume as much electricity as 31,000 homes—half the city's households combined.

And this is not just any data center. With the rise of AI hyperscale racks, each rack can draw 60 to 100 kilowatts—equivalent to the power of 40 to 80 homes. Hundreds of these racks together create a demand that rivals entire neighborhoods.

But here's the critical question: what's stopping Karis Critical from increasing that demand even further once the infrastructure is in place? Once the Indian Hill Substation is upgraded, there is nothing preventing Karis from filling the facility with even more high-density racks, pushing consumption far beyond the 36-megawatt threshold. Where is the accountability? Who ensures that residents are not left carrying the costs of additional upgrades, higher rates, or more frequent outages? This project becomes a blank check—one where the risks are absorbed by our community while the profits flow to a private corporation.

Third, reliability. On October 26, residents experienced a power outage due to aging infrastructure. If we cannot reliably serve our current customers, how can we justify adding a facility that consumes as much electricity as half the city? The city's own website acknowledges the need to replace aging underground cables and transformers. Shouldn't we prioritize reliability for residents before bending over backwards for a private corporation?

Council Members, this is about fairness and priorities. Do we

want to dedicate scarce infrastructure to a facility that strains our electric grid, risks more outages, and provides minimal community benefit? Or do we want to invest in development that strengthens Naperville for generations?

For these reasons, I respectfully urge you to vote no on this proposal.

Click the link below to review and/or respond to the submission.

