



PennFuture



DEP Northwest Regional Office
c/o Waterways & Wetlands Program
230 Chestnut Street,
Meadville PA 16335-3481
RA-EPWW-NWRO@pa.gov

November 10, 2025

RE: Homer City Generation LP Chapter 105 Permit Application (E3206225-003)

Dear DEP Permit Reviewer,

Citizens for Pennsylvania's Future (PennFuture), Clean Air Council (CAC), and the Sierra Club submit these comments in connection with the Chapter 105 permit application associated with the Proposed Bruner Field Project for Homer City Generation LP.

Citizens for Pennsylvania's Future is a member-supported, non-profit, environmental organization fighting for an equitable, job-creating state economy by advancing clean air, pure water, and climate change solutions through legal advocacy, policy engagement, and empowering all Pennsylvanians. Clean Air Council is a nonprofit environmental health organization with offices in Philadelphia and Pittsburgh, Pennsylvania. The Council has been working to protect everyone's right to a clean and healthy environment for nearly 60 years. The Council has members throughout Pennsylvania and the Mid-Atlantic region who support its mission, including in Indiana County. The Sierra Club is the nation's largest and oldest grassroots environmental organization, with over 24,000 members in Pennsylvania. The Sierra Club's mission is to explore, enjoy, and protect the wild places of the earth; to practice and promote the responsible use of the earth's ecosystems and resources; to educate and enlist humanity to protect and restore the quality of the natural human environment; and to use all lawful means to carry out these objectives.

This application and the proposed excavation, earthmoving, and other construction impacts to waterways and wetlands anticipated by this project are all in support of the Homer City Generation LP's ("the Applicant's") proposal to construct a fracked gas-fired Combined-Cycle/ Simple-Cycle power plant to produce up to 4.5 gigawatts of electricity in Black Lick and Center Townships, Indiana County. The power plant, which is intended to generate a massive amount of electricity, would potentially be part of a 3,200-acre data center campus (together,

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Northeast : 1539 Cherry Lane Road
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Pittsburgh, PA 15222

Southeast: 1429 Walnut Street
Suite 701
Philadelphia, PA 19102

Commenters refer to the work on this site as “the Project.”). Homer City Redevelopment, *Project Overview*, <https://www.homercityredevelopment.com/project-overview>. If built, the Project would include the largest fracked gas power plant in the country. *See Marc Levy, Coal-fired power plant, now retired, to become massive gas-powered campus for AI, data centers*, AP News (April 2, 2025), <https://apnews.com/article/technology-ai-natural-gas-electricity-pennsylvania-450534992fab8dd3527b64b92614259e>.

COMMENTS

- 1. The Department must evaluate this permit in the context of the potential impacts of the entire Project the Applicant is planning for this site and the Department’s duties under Article 1, Section 27 of the Pennsylvania Constitution.**

When evaluating a permit application, the Department must exercise its discretion in accordance with its mandatory trustee duties under Article I, Section 27 of the Pennsylvania Constitution. *Montgomery Twp. Friends of Family Farms v. DEP*, EHB Docket No. 2020-082-L (Opinion and Order on Motion in Limine issued July 3, 2024). Article I, Section 27 provides that:

The people have a right to clean air, pure water, and to the preservation of the natural, scenic, historic and esthetic values of the environment. Pennsylvania's public natural resources are the common property of all the people, including generations yet to come. As trustee of these resources, the Commonwealth shall conserve and maintain them for the benefit of all people.

Pa. Const. art. I, § 27. The Department’s duty to conserve and maintain Pennsylvania’s natural resources, which includes preventing degradation of those resources caused by climate change, cannot be fulfilled by considering this Chapter 105 permit application in isolation. The Department must evaluate the potential climate impacts of the full intended Project, including the construction of a massive power plant to fuel the data center campus.

Additionally, the Department can evaluate the impact on the beneficiaries of the trust only by considering the full context of the harm that climate is already causing and is projected to cause across the Commonwealth. These harms in terms of the health, economic, and environmental costs from the degradation of natural resources, are detailed below.

a. The Department’s “concierge” approach to permitting for the Project conflicts with the Department’s duty to conserve and maintain Pennsylvania’s public natural resources for the benefit of current and future generations of Pennsylvanians.

In connection with other permits required for the Applicant’s current proposal for the Project, the Department has said that its goal is “to provide a concierge level of service.” Taking a “concierge” approach is in direct contradiction of the Department’s constitutional role as a trustee of Pennsylvania’s public natural resources, which the Department is obligated to conserve and maintain for the benefit of current and future generations. As an agency of the Commonwealth, the Department is bound by Article I, Section 27 of the Pennsylvania Constitution. *See Pa. Env’t Def. Found. v. Commw. (PEDF II)*, 161 A.3d 911, 931 n.23 (Pa. 2017). When the Department exercises its discretion in “evaluat[ing] a permit . . . application, decid[ing] how to act on that application, and decid[ing] what permit conditions and . . . pollution control technologies[] that the operation would be subject to,” Article I, Section 27 directly bears on that exercise. *Montgomery Twp. Friends of Family Farms v. DEP*, EHB Docket No. 2020-082-L (Opinion and Order on Motion in Limine issued July 3, 2024). Indeed, the approach represented by a “concierge level of service” undermines the Department’s credibility as to every permit reviewed, evaluated, and potentially issued in connection with this site and any other Departmental actions regarding this proposed Project.

b. The Department must not abdicate its duty under Article I, Section 27 to maintain a stable climate by recklessly and unnecessarily issuing permits related to the construction of a massive data center with its associated fossil-fuel-powered power plant.

i. Permitting the Project would exacerbate the adverse effects of climate change and therefore impose additional costs on municipalities.

Permitting the Project would exacerbate the adverse effects of climate change and severely burden Pennsylvania’s municipalities with additional costs to sustain vital infrastructure and implement necessary resiliency measures. In its recent study, the Center for Climate Integrity (“CCI”) analyzed the cost of climate change for Pennsylvania municipalities, and it found that municipalities (not counting costs to state or federal entities) will pay approximately \$15.47 billion in climate mitigation projects by 2040. The Center for Climate Integrity, *Pennsylvania’s Looming Climate Cost Crisis*, July 2023, <https://climateintegrity.org/uploads/media/Pennsylvania-ClimateCostStudy-2023.pdf> [hereinafter “CCI Report”].

Pennsylvania has already seen an increase in extreme heat days, extreme heat injuries/death, precipitation, and flooding. The secondary impacts of extreme heat and increased precipitation include school closures due to overly hot classrooms (many schools do not have air conditioning and predate climate change concerns), building cooling centers to prevent heat-induced injuries or death, expanding and upgrading storm drainage systems to prevent sewage from bypassing wastewater treatment facilities, upgrading bridges' resiliency, repairing road damage, and building coastal defenses. *Id.*

Climate change effects may increase extreme heat events sevenfold in Pennsylvania by 2050. PA DEP, *Pennsylvania Climate Impacts Assessment 2021*, 2021, https://files.dep.state.pa.us/Energy/Office%20of%20Energy%20and%20Technology/OETDPortalFiles/Climate%20Change%20Advisory%20Committee/2021/2-23-21/2021_Impacts_Assessment_Final_2-09-21_clean.pdf. Already, more frequent extreme heat days have led to higher heat-related injuries and death and school closures. CCI Report at 10. Many schools in Pennsylvania, most notably many urban schools, do not have air conditioning. Classrooms have reached over 90 degrees Fahrenheit, which directly correlates with decreased school performance and grades. Rather than force children to endure such unhealthy conditions, some schools have closed at such times, and thus wasted otherwise viable school days. *Id.* at 11–12. The projected cost for schools to renovate their HVAC systems is about \$1.23 billion—a cost that falls once again on residents' shoulders. *Id.* at 11. Additionally, Pennsylvania municipalities will need to maintain cooling centers for those without air conditioning and to prevent heat-related injuries and deaths. This endeavor is expected to cost \$78.8 million. *Id.* at 14.

Permitting this Project, with its enormous projected greenhouse gas emissions and therefore enormous contribution to climate change, would therefore help lock in a future with unsustainable financial encumbrances for Pennsylvania's municipalities and their residents.

ii. The Department, as a trustee, must not act to condemn Pennsylvanians to the costly and lasting health and economic damages associated with rising temperatures.

The Department projects the impact of climate change in Pennsylvania if climate change continues with unabated GHG emissions in depth in the Department's 2024 Pennsylvania Climate Impact Assessment. PA DEP, *Pennsylvania Climate Impact Assessment 2024* (April 2025), available at <https://www.pa.gov/agencies/dep/residents/climate-change/impacts>. The Department's predictions, although dire, did not account for factors which may increase GHG emissions, such as a potential data center boom pushing the expansion of fossil fuel-powered energy generation. Thus, the actual damage in Pennsylvania may be considerably worse than currently predicted.

The Department found that average temperatures in Pennsylvania are already rising and are projected to exceed the 1971–2000 baseline by 6.7°F by mid-century and 10.4°F by the end of the century. *Id.* at 12. The frequency of extremely hot days—those reaching temperatures over 90°F—is expected to increase to 23–36 days per year by mid-century, although, by then, some areas of Pennsylvania may expect to endure blistering temperatures for over 75 days per year. *Id.*

In addition to the more obvious health impacts of extreme temperatures, extreme heat increases the risk of miscarriages and preterm births. *Id.* at 119. “Exposure to extreme temperatures could affect multiple birth outcomes including length of gestation, birth weight, stillbirth, and neonatal stress. Exposure to extreme heat that occurs in all stages of pregnancy contributes to the risk of preterm birth, and in so doing increases the risk of morbidity and mortality. Preterm birth is a leading cause of morbidity and mortality in newborns.” *Id.* The cost to families will be beyond measure.

Outdoor workers, comprising 27% of Pennsylvania’s workforce, are also at greater risk of dehydration, heat stroke, and even accidental injuries during heat waves. *Id.* at 4. The physical stress they must endure would be exacerbated by the higher levels of air pollution exposure.

Longer warm seasons and rising temperatures are already altering Pennsylvania’s ecology in ways that hurt residents’ health, and the impact will continue to grow. Climate change is increasing the rates of Lyme disease and other tick-borne illnesses in Pennsylvania, a state that already has among the highest rates of Lyme disease. Sarah Boden, *Climate Change in Pa. Is Increasing Risk of Lyme Disease, Other Tick-Borne Illnesses*, 90.5 WESA (June 30, 2023), <https://www.wesa.fm/health-science-tech/2023-06-30/climate-change-pennsylvania-lyme-disease-ticks>. Tick species once limited to other regions, along with illnesses they spread, are now being found in Pennsylvania.

Pennsylvania’s forest ecosystems and forestry industry will also likely suffer. PennState Extension, *Climate Change Effects on Pennsylvania’s Forests* (updated Jan. 8, 2024), <https://extension.psu.edu/climate-change-effects-on-pennsylvanias-forests>. Changes in precipitation patterns, including higher total precipitation concentrated in the cooler months, more frequent droughts in hotter months, and more intense precipitation events loosening soil, will likely stress trees. *Id.* Forests will have more trouble regenerating because higher temperatures and drought decrease seedling survival rates. *Id.* “Forest pests and pathogens can respond rapidly to warming climate and will be able to damage forest ecosystems already stressed by changes in climate.” *Id.* Additionally, native ecosystems will face increased pressure from invasive insects and plant species that can expand their ranges to the north as temperatures increase. *Id.* These factors will combine to harm both Pennsylvania’s native ecosystems and its forestry industry.

The Commonwealth’s “geology, soil texture, precipitation, and rate of human development” also make some regions significantly susceptible to sinkholes, with Southeastern Pennsylvania being a “hotspot.” *Id.* at 43. With climate change expected to cause more frequent extreme precipitation, droughts, and a decreased groundwater table for at least parts of the year, all of which are risk factors for sinkholes, sinkhole formation is likely to increase. *Id.* at 39. Sinkholes “are serious hazards in the Commonwealth that affect transportation networks and buildings and create serious health and safety concerns.” *Id.*

Additionally, as temperatures increase, Pennsylvania’s energy resilience will decrease. *Id.* at 4. The increased frequency and severity of extreme weather events “will make power outages more frequent, widespread, and disruptive.” *Id.* Heat waves can overload the grid, causing outages, and when a power outage coincides with extreme heat or cold, Pennsylvania’s residents, particularly in low-income communities, are likely to become ill or worse from exposure to the extreme temperatures. *See id.*

2. The Department cannot properly evaluate the Application for the Chapter 105 Permit until the Applicant fully explains the scope of the activity for which the Applicant is seeking the permit and performs additional analysis of the potential impacts of the full Project.

According to the Application, this application is to perform work on this site to get it ready for further development. However, despite the Applicant’s public statements on its website and its publicly shared “redevelopment plan,” that further activity remains entirely unclear. DEP cannot comply with its obligation to ensure that public health and the environment are protected when it does not even have the full picture from the applicant of what is asking to be permitted.

Additionally, the Department should require the Applicant to submit a complete post-construction stormwater and pollutant-load analysis, without which the Department cannot properly evaluate the potential harms from the project. Moreover, any future Chapter 105 authorization should trigger updated hydrologic and water-quality analyses demonstrating continued compliance with 25 Pa. Code §105.14(b).

The Department should also require the Applicant to provide an updated alternatives analysis demonstrating avoidance and minimization of impacts to wetlands and impaired streams. The Department has stated that the alternatives analysis “is integral to evaluating compliance with Chapter 105.” DEP, *Guidance for Developing a Chapter 105 Alternatives Analysis* 4 (Aug. 5, 2023), <https://greenport.pa.gov/elibrary/PDFProvider.ashx?action=PDFStream&docID=5411359&chks=um=&revision=0&docName=GUIDANCE+FOR+DEVELOPING+A+CHAPTER+105+ALTER>

NATIVES+ANALYSIS&nativeExt=pdf&PromptToSave=False&Size=442719&ViewerMode=2&overlay=0. A proper analysis should include “a detailed analysis of alternatives to the proposed action, including alternative locations, routings or designs to avoid or minimize adverse environmental impacts.” Thus, the Department should not consider the Application to be complete until the Applicant submits a satisfactory updated analysis.

3. The Department has not complied with its Environmental Justice Participation Policy.

The application states that no Environmental Justice (EJ) communities exist within 0.5 miles of the site, but we know from the Applicant’s application for its air quality air plan approval that the site *is* located in or within a 0.5 mile radius of an environmental justice community. *See PSD Application, Homer City (August 4, 2025),* <https://files.dep.state.pa.us/RegionalResources/NWRO/NWROPortalFiles/Homer-City/Air/PSD-Application-HomerCity-8-4-2025.pdf>.

It is DEP’s policy to consider EJ status in its evaluation of permit applications, and identify “mitigation and restoration practices for consideration by applicants for projects in EJ areas.” Environmental Justice Policy, DEP (Sept. 16, 2023). The project applicant should be following DEP’s Environmental Justice Participation Policy to ensure that the communities near this site, with its legacy of industrial pollution, are involved in, aware of, and able to participate in commenting on proposed activities on the site. Commenters encourage DEP to thoroughly consider the long-term health and environmental consequences associated with this and all of the proposed activities for this Project, sited in an EJ community.

4. The Department should require pre-and post-construction soil and groundwater testing for historic pollutants.

The project area here is historically associated with coal combustion waste disposal and ash storage. Because of this historic land use, any excavation, earth-moving, and stormwater management risks uprooting historic contaminants, including heavy metals. DEP should require the applicant to conduct pre- and post-construction soil and groundwater testing for these historic pollutants and ensure that they are not moving across the site to contaminate additional places. Commenters here support and reiterate the specific water quality concerns identified by Three Rivers Waterkeeper in their comments to the Department on this permit application.

CONCLUSION

Commenters appreciate the opportunity to comment on this application and thank you in advance for your consideration of these comments.

Sincerely,

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November 10th, 2025

RE: Homer City Generation LP Chapter 105 Permit Application (E3206225-003)

Dear PA Department of Environmental Protection,

Three Rivers Waterkeeper (3RWK) appreciates the opportunity to comment on the proposed Bruner Field Project, located within the Homer City Generating Station property in Black Lick and Center Townships, Indiana County. Given the site's proximity to legacy industrial operations and the scale of proposed earth disturbance, with over 161 acres of grading, wetland fill, and stream alteration, 3RWK has a strong interest in ensuring that all activities fully comply with the Clean Water Act (§§301, 402, 404), the Pennsylvania Clean Streams Law (§§401, 307, 611), and 25 Pa. Code Chapter 105 to ensure that the project does not cause degradation of waters of the Commonwealth.

Three Rivers Waterkeeper was founded in 2009 and serves as both a scientific and legal advocate for the Allegheny, Monongahela, and Ohio Rivers and their watersheds in Southwestern PA. These waterways are critical to the health, vitality, and economic prosperity of our region and communities. We are both a scientific and legal advocate for the community, working to ensure that our three rivers are protected and that our waters are safe to drink, fish, swim, and enjoy. We monitor and patrol our waterways, and take samples of basic parameters using our own sampling device, E.coli samples, PFAS samples and specific parameters at external laboratories. We also highlight the variety of species that live in our aquatic and riparian ecosystems. We are one of the over 300 organizations that make up the global Waterkeeper Alliance and work together to connect local communities to global environmental and advocacy resources.



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Project Purpose & Future Development Consistency

The application describes the proposal as a “stand-alone” grading activity intended to create a vegetated pad and permanent stormwater facilities, yet the design assumes future impervious build-out that remains undefined. This inconsistency warrants further review under the Chapter 105 permit. 3RWK requests that DEP require the applicant to submit a complete post-construction stormwater and pollutant-load analysis as part of this application, and to condition any Chapter 105 authorization such that future site development triggers updated hydrologic and water-quality analyses demonstrating continued compliance with 25 Pa. Code §105.14(b)¹ (Environmental Assessment and Alternatives Analysis) and §105.21(a)² (Permit Issuance Criteria).

Given that the project area lies within and adjacent to a site historically associated with coal combustion waste disposal and ash storage, earthwork and infiltration-based stormwater controls risk mobilizing residual contaminants such as arsenic, selenium, lead, and manganese into groundwater or surface waters. No soil or groundwater data are provided to substantiate the assertion that “no contaminated soils exceed DEP thresholds”.³ DEP should require the applicant to conduct pre-construction soil and groundwater testing for coal-combustion residuals and metals, install monitoring wells near stormwater basins to verify water-quality conditions, and employ impermeable liners or non-infiltrating BMPs where industrial fill is present, consistent with the Clean Streams Law § 401 prohibition on creating a condition of pollution.

Wetlands & Streams Mitigation and Impact Minimization

The Approved Jurisdictional Determination identifies one jurisdictional wetland (Wet-F) and one jurisdictional stream (S1), while several other delineated wetlands and tributaries remain Waters of the Commonwealth under state law. The project would permanently impact approximately 0.126 acres of five wetlands and 441 linear feet of stream channel, including UNTs to Muddy Run and Blacklick Creek. Mapping within the application indicates that UNT 64693 is siltation-impaired, yet the application fails to address this status or propose specific BMPs to prevent additional sedimentation. 3RWK recommends that DEP require an updated alternatives analysis demonstrating avoidance and minimization of impacts to wetlands and impaired streams, ensure submission of a functional wetland mitigation plan providing a net gain of hydrologic and habitat function rather than acreage replacement, include long-term monitoring

¹ [25 Pa. Code § 105.14\(b\)](#).

² [25 Pa. Code §105.21\(a\)](#)

³ *Homer City Generation LP, Chapter 105 Water Obstruction and Encroachment Permit Application (E3206225-003)*, General Information Form, p. 11



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and maintenance requirements for any created or restored wetlands, and maintain vegetated buffers and setbacks along wetland and stream edges to preserve hydrologic integrity.

The applicant proposes to offset wetland impacts through the purchase of 1.45 credits from Pennsylvania's PIESCES mitigation program, in lieu of performing on-site or in-watershed restoration. While mitigation banking can be a valid regulatory mechanism, the use of off-site credits raises important questions regarding ecological equivalence, watershed proximity, and long-term functional replacement. Under 25 Pa. Code §105.14(b) and §105.18(a)⁴, DEP must ensure that compensatory mitigation achieves no net loss of wetland function and value, not simply acreage replacement.

To meet these standards, DEP should require the applicant to demonstrate that purchased credits are sourced from projects within the same HUC-12 or HUC-8 watershed as the impacted area in the Blacklick Creek basin, that they replace comparable wetland types (palustrine emergent, scrub-shrub, or forested), and that they include measurable performance standards and long-term monitoring to verify success. If equivalent functional replacement cannot be demonstrated, DEP should require on-site or watershed-based restoration in lieu of off-site credit purchases. 3RWK further urges DEP to disclose the selected mitigation bank or PIESCES project to the public to ensure transparency and compliance with 25 Pa. Code §105.18a(a)(3) and the DEP & U.S. Army Corps Compensatory Mitigation Framework.

Stormwater, Sediment & Pollutant Load Controls

While the application references stormwater management and erosion control measures, it lacks design data for pollutant-load reduction (TSS, TDS, and metals), peak flow, and volume control to demonstrate compliance with Chapter 105 issuance criteria. Given the project's location in the Blacklick Creek watershed, which is impaired for sediment and metals, DEP should require submission of a post-construction hydrologic and pollutant-load analysis demonstrating that discharges from the proposed facilities will not contribute to further impairment or alteration of natural hydrology, pursuant to §105.21(a), which states that a project must not adversely affect public health, safety, or the environment.

Because at least one affected tributary (UNT 64693) is listed as siltation-impaired, DEP must ensure that the permit record demonstrates the project will not exacerbate existing impairments and that BMPs are appropriately designed to control sediment and turbidity in cold-water fisheries streams, consistent with DEP's obligation under §105.14(b)(7) to evaluate effects on aquatic life and water quality standards. The U.S. Fish and Wildlife Service IPaC list identifies

⁴ [25 Pa. Code §105.18\(a\).](http://25 Pa. Code §105.18(a).)



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the Indiana bat (*Myotis sodalis*), northern long-eared bat (*Myotis septentrionalis*), and tricolored bat (*Perimyotis subflavus*). 3RWK requests DEP verify that time-of-year tree-clearing restrictions and roost habitat protections are incorporated into permit conditions under §105.14(b)(6).

Environmental Justice & Public Participation

The application also states that no Environmental Justice (EJ) communities exist within 0.5 miles of the site, yet residents of Homer City and Black Lick have endured decades of industrial exposure and water-quality impacts. DEP's Environmental Justice Public Participation Policy (2023) encourages expanded outreach and engagement for communities with historic environmental burdens. 3RWK recommends that DEP expand EJ screening to include adjacent and downstream communities, publicly disclose the Erosion and Sediment Control and stormwater design plans for public review, and consider holding a public information meeting prior to final permit decision.

Under the Clean Streams Law and Chapter 105, DEP retains authority to ensure that permitted activities will not degrade waters of the Commonwealth or adversely affect public health, safety, or the environment. Relevant provisions include 25 Pa. Code §105.14(b), requiring an Environmental Assessment and Alternatives Analysis demonstrating avoidance and minimization of wetland and stream impacts; §105.18a, mandating replacement of lost wetland functions and values; and §105.21(a), authorizing DEP to issue a permit only if the project does not adversely affect the environment. 3RWK respectfully requests that DEP require a more complete Alternatives Analysis demonstrating practicable avoidance of wetland and stream impacts, mandate soil and groundwater investigations for coal-combustion residuals and metals with monitoring wells near stormwater basins, require a post-construction stormwater and pollutant-load analysis demonstrating no adverse effect on downstream waters, and condition permit approval on a functional wetland mitigation plan with long-term monitoring and maintenance. These requests are consistent with DEP's obligations under the Clean Streams Law and Chapter 105 to prevent degradation of Commonwealth waters.

Conclusion

Given the Bruner Field Project's industrial setting, extent of earth disturbance, and proximity to impaired waters, 3RWK urges DEP to withhold permit issuance until the applicant provides a comprehensive alternatives analysis, soil and groundwater data, stormwater modeling, and a functionally robust wetland mitigation plan. These steps are essential to ensure compliance with the Clean Streams Law and Chapter 105 requirements and to protect the Blacklick Creek



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watershed and downstream communities. 3RWK appreciates DEP's attention to these concerns and remains available for discussion or clarification of any of these recommendations.

Thank you for your time and consideration.

Sincerely,

Heather Hulton VanTassel, PhD
Executive Director, Three Rivers Waterkeeper
Heather@threeriverswaterkeeper.org

Uber, Barbara

From: [REDACTED]
Sent: Monday, November 10, 2025 3:35 PM
To: EP, WW-NWRO
Subject: [External] Permit Application (E3206225-003)

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Dear DEP Administrator,

As a resident of Indiana County, I am deeply concerned about the current plan to redevelop the Homer City power plant site to build a new fracked-gas power plant and datacenter. I understand that an application has been submitted for a water-obstruction permit for Homer City Generation LP Development Corporation, but the plans for the proposed site are incomplete and non-transparent, so I don't see how the DEP can comply with the legal requirement that it protect public health and the environment, especially our precious watersheds.

I also understand that the site is located within a designated Environmental Justice community and must therefore adhere to the DEP'S Environmental Justice Participation Policy, ensuring that community members are fully informed and able to participate in the planning of proposed activities on the site.

Finally, the construction on the site may very well disturb previously dumped ash and waste from the coal-burning plant, particularly heavy metals. DEP is required by law to conduct soil and groundwater testing before and after this construction to ensure that there is no further contamination on the site.

I say all this with deep concern for my community's health and environment, particularly our watersheds and air quality. I am not at all reassured by DEP's review process, and I therefore request that any current permit application be denied. On the whole, the community has been kept in the dark by the private developers about their intentions for the site, so there is widespread fear, confusion and anger that, once again, residents will be exposed to toxic pollution to our streams and air.

I would be grateful for a reply to my email.

Sincerely,

Uber, Barbara

From: [REDACTED]
Sent: Monday, November 10, 2025 1:55 PM
To: EP, WW-NWRO
Subject: [External] Homer City Energy Campus

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I wish to voice my opposition to the Homer City Energy Campus.

[REDACTED]

Sent from my Verizon, Samsung Galaxy smartphone

Uber, Barbara

From: [REDACTED]
Sent: Monday, November 10, 2025 1:46 PM
To: EP, WW-NWRO
Subject: [External] Permit Application (E3206225-003)

ATTENTION: This email message is from an external sender. Do not open links or attachments from unknown senders. To report suspicious email, use the [Report Phishing button in Outlook](#).

This is in regard to the application for a water-obstruction permit for Homer City Generation LP covering the development of a 68.6 acre graded pad and stormwater management facilities. I am writing to object to granting this permit as it has been presented.

First, this permit does not address or explain subsequent site development and therefore the DEP can't ensure the protection of human health and the environment. We don't have the whole picture of what this development entails.

Second, this area has for a long time been a site for coal combustion and ash storage. Because of this historic land use, any excavation, earth-moving, and stormwater management risks uprooting historic contaminants, including heavy metals. The applicant should conduct pre- and post-construction testing, and groundwater testing, to ensure that construction does not cause additional contamination.

Respectrully sibmited,

Uber, Barbara

From: [REDACTED]
Sent: Monday, November 10, 2025 6:02 PM
To: EP, WW-NWRO
Subject: [External] Comments on water permit for HC power plant and AI data center

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Hello,

I, and many of my fellow citizens of Indiana, PA have concerns about the safety of the water systems of a huge power plant and AI data center proposed for our area:

- This application is to do work on this site to get it ready for further development, but that further activity remains entirely unclear. DEP cannot comply with its obligation to ensure that public health and the environment are protected when it does not even have the full picture from the applicant of what is asking to be permitted.
- The application states that no Environmental Justice (EJ) communities exist within 0.5 miles of the site, but we know from the company's application for its air quality air plan approval that the site *is* located located in or within a 0.5 mile radius of an environmental justice community. The project applicant should be following DEP's Environmental Justice Participation Policy to ensure that the communities near this site, with its legacy of industrial pollution, are involved and aware of proposed activities on the site.
- The project area here is historically associated with coal combustion waste disposal and ash storage. Because of this historic land use, any excavation, earth-moving, and stormwater management risks uprooting historic contaminants, including heavy metals. DEP should require the applicant to conduct pre-and post-construction soil and groundwater testing for these historic pollutants and ensure that they are not moving across the site to contaminate additional places.

Please keep us informed of all the information available that you would want if this were happening on your neighborhood.

Thank you,

Uber, Barbara

From: [REDACTED]
Sent: Monday, November 10, 2025 1:49 PM
To: EP, WW-NWRO
Subject: [External] Permit application comments

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Re: E3206225-003

What exactly is the applicant asking for in the permit? Exploratory can mean a lot of different things. It is not clear exactly what they will do?

Because this project area has been historically polluted and hasn't even recovered from that ,why pollute us again and more?! This is not what people want that live here only outsiders or temporary residence who call themselves residence, but are really not.

People are not being informed what the worst repercussions are! This project will kill our area and destroy our homes and our crops in our soil and depreciate all of our homes and bring us unhealthy air. We cannot bring our children here. We cannot have a university here. Nobody will want to come here again because it'll be polluted.

Please do not let the people down because of money. We must make the change now to be better. This is the same mistake over and over again, more destruction.

Sincerely

Uber, Barbara

From: [REDACTED]
Sent: Monday, November 10, 2025 11:52 AM
To: EP, WW-NWRO
Subject: [External] Permit Application (E3206225-003)

ATTENTION: This email message is from an external sender. Do not open links or attachments from unknown senders. To report suspicious email, use the [Report Phishing button in Outlook](#).

To: DEP on the application for a water-obstruction permit for Homer City Generation LP covering the development of a 68.6 acre graded development pad and stormwater management facilities.

The Department of Environmental Protection is jumping the gun if they mean to approve this permit. The DEP must wait until all pertinent information is gathered and shared with surrounding communities. The project applicant should follow DEP's Environmental Justice Participation Policy.

- This application is to do work on this site to get it ready for further development, but that further activity remains entirely unclear. DEP cannot comply with its obligation to ensure that public health and the environment are protected when it does not even have the full picture from the applicant of what is asking to be permitted.
- The application states that no Environmental Justice (EJ) communities exist within 0.5 miles of the site, but we know from the company's application for its air quality air plan approval that the site *is* located in or within a 0.5 mile radius of an environmental justice community. The project applicant should be following DEP's Environmental Justice Participation Policy to ensure that the communities near this site, with its legacy of industrial pollution, are involved and aware of proposed activities on the site.
- The project area here is historically associated with coal combustion waste disposal and ash storage. Because of this historic land use, any excavation, earth-moving, and stormwater management risks uprooting historic contaminants, including heavy metals. DEP should require the applicant to conduct pre-and post-construction soil and groundwater testing for these historic pollutants and ensure that they are not moving across the site to contaminate additional places.

I am a local resident, and I sincerely ask that you follow the rules here to protect me from the permanent loss of 441 feet of stream channel and 0.126 acre of wetland area.

[REDACTED]

--
[REDACTED]

Request for Public Hearing

**Chapter 105 Permit Application No. E3206225-003 and No. E3206225-004
(Homer City Data Center)**

To: Pennsylvania Department of Environmental Protection

Northwest Regional Office, Waterways & Wetlands Program

230 Chestnut Street

Meadville, PA 16335-3481

Date: December 28, 2025

To Whom It May Concern,

Westmoreland
I am writing as a concerned resident of INDIANA COUNTY to provide formal

comment and to formally request that the Department of Environmental Protection (DEP) hold a **public hearing** regarding the Chapter 105 Water Obstruction and Encroachment Permit Applications (No. E3206225-003 and E3206225-004) submitted by Homer City Redevelopment.

This project involves the permanent loss of over 2.4 acres of wetlands and 160+ feet of streams in Indiana County. Given the unprecedented scale of the overall 4.4 GW data center campus and the significant public interest already demonstrated during the air quality permit phase, a public hearing for this water permit is necessary to:

- 1. Address Local Water Impacts and Protection of Tailrace Fisheries:** Allow residents to provide testimony on how the loss of these wetlands may affect local flood management, special trout habitat and the water quality of the Cherry Run watershed. I request a hydrological study.
- 2. Evaluate Cumulative Effects:** Ensure the DEP considers the combined environmental stress of this project alongside the existing infrastructure and historical pollution at the site.
- 3. Ensure Transparency:** Provide a platform for the community to understand the "in-lieu fee" mitigation strategy and whether it truly compensates for the local ecological loss.

I urge the Department to exercise its discretion to schedule a "Fact Finding" hearing so that the residents of Indiana County can participate fully in the protection of our Commonwealth's water resources.

Respectfully,

A large black rectangular redaction box covering the signature area.

From: [Audrey Allen](#)
To: [EP, WW-NWRO](#); RA-EPAIRNW@pa.gov
Cc: [REDACTED]
Subject: [External] Request for Public Hearing - Chapter 105 Permit Application No. E3206225-003 and No. E3206225-004 (Homer City Data Center)
Date: Monday, December 29, 2025 6:20:11 AM

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Request for Public Hearing

Chapter 105 Permit Application No. E3206225-003 and No. E3206225-004 (Homer City Data Center)

To: Pennsylvania Department of Environmental Protection

Northwest Regional Office, Waterways & Wetlands Program

230 Chestnut Street

Meadville, PA 16335-3481

Date: December 28, 2025

To Whom It May Concern,

I am writing as a concerned resident of INDIANA COUNTY to provide formal comment and to formally request that the Department of Environmental Protection (DEP) hold a **public hearing** regarding the Chapter 105 Water Obstruction and Encroachment Permit Applications (No. E3206225-003 and E3206225-004) submitted by Homer City Redevelopment.

This project involves the permanent loss of over 2.4 acres of wetlands and 160+ feet of streams in Indiana County. Given the unprecedeted scale of the overall 4.4 GW data center campus and the significant public interest already demonstrated during the air quality permit phase, a public hearing for this water permit is necessary to:

1.

Address Local Water Impacts and Protection of Tailrace Fisheries: Allow residents to provide testimony on how the loss of these wetlands may affect local flood management, special trout habitat and the water quality of the Cherry Run

watershed. I request a hydrological study.

2.

Evaluate Cumulative Effects: Ensure the DEP considers the combined environmental stress of this project alongside the existing infrastructure and historical pollution at the site.

3.

Ensure Transparency: Provide a platform for the community to understand the "in-lieu fee" mitigation strategy and whether it truly compensates for the local ecological loss.

I urge the Department to exercise its discretion to schedule a "Fact Finding" hearing so that the residents of Indiana County can participate fully in the protection of our Commonwealth's water resources.

Respectfully,

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

-----Please send confirmation of receipt-----

From: [REDACTED]
To: [EP_WW-NWRO](#)
Subject: [External] Homer City plant
Date: Tuesday, December 30, 2025 6:33:40 AM

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To Whom It May Concern,

I am writing on behalf of Ken Sink Chapter of Trout Unlimited and as a concerned resident of INDIANA COUNTY to provide formal comment and to formally request that the Department of Environmental Protection (DEP) hold a **public hearing** **regarding** the Chapter 105 Water Obstruction and Encroachment Permit Applications (No. E3206225-003 and E3206225-004) submitted by Homer City Redevelopment.

This project involves the permanent loss of over 2.4 acres of wetlands and 160+ feet of streams in Indiana County. Given the unprecedeted scale of the overall 4.4 GW data center campus and the significant public interest already demonstrated during the air quality permit phase, a public hearing for this water permit is necessary to:

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Address Local Water Impacts and Protection of Tailrace Fisheries: Allow residents to provide testimony on how the loss of these wetlands may affect local flood management, special trout habitat and the water quality of the Cherry Run watershed. I request a hydrological study.

2.

Evaluate Cumulative Effects: Ensure the DEP considers the combined environmental stress of this project alongside the existing infrastructure and historical pollution at the site.

3.

Ensure Transparency: Provide a platform for the community to understand the "in-lieu fee" mitigation strategy and whether it truly compensates for the local ecological loss.

I urge the Department to exercise its discretion to schedule a "Fact Finding" hearing so that the residents of Indiana County can participate fully in the protection of our Commonwealth's water resources.

Bob Sagely
Youth Activities Coordinator
KEN SINK CHAPTER TROUT UNLIMITED
Indiana, PA