



Raleigh Council Meeting

October 6th, 2026

Re: Sound Rivers Comments re Proposed Data Center Moratorium

Dear Raleigh City Council Members,

Sound Rivers is a nonprofit organization dedicated to protecting and improving the health of the Neuse River Basin and its waterways. As an organization focused on water quality, water availability, and the long-term protection of water resources for the communities that depend upon them, Sound Rivers supports meaningful local action to ensure that the rapid expansion of data center development does not outpace the ability of local governments to understand and manage its impacts.

Sound Rivers urges the Raleigh City Council to adopt a stronger and longer-term moratorium on new data center development than the one currently proposed. While a moratorium is an important first step, a six-month pause is not sufficient to conduct the research, analysis, public engagement, and policy development necessary to ensure that Raleigh residents and natural resources are adequately protected.

Six months is not sufficient to do the work necessary to protect Raleigh

The rapid growth of data center development presents significant and still poorly understood challenges for water resources, wastewater infrastructure, energy systems, land use, air quality, and surrounding communities. Local governments should not be expected to approve or facilitate this scale of industrial development while critical questions about its impacts remain unanswered.

A meaningful moratorium should provide the City with adequate time to:

- Assess current and projected water demands associated with data center development;
- Evaluate whether Raleigh's water resources and infrastructure can sustainably accommodate additional industrial water demand, including under drought and future climate conditions;

- Evaluate wastewater treatment capacity and the potential water quality pollutants associated with different types of data center cooling systems;
- Assess energy demand and associated impacts on water consumption, infrastructure, emissions, and grid reliability;
- Establish appropriate development standards, setbacks, environmental safeguards, and performance requirements for large-scale facilities;
- Evaluate potential impacts on nearby communities and environmental justice concerns;
- Develop a transparent framework for evaluating future data center proposals; and
- Engage residents, technical experts, water utilities, environmental organizations, and other stakeholders in developing appropriate safeguards.

These are substantial policy and technical questions. Six months is an arbitrary and inadequate timeframe in which to complete this work responsibly.

A short moratorium creates an unnecessary burden on the City

A six-month moratorium also creates a structural problem: if the necessary research and policy work is not complete when the moratorium expires, the City would then have to demonstrate why an extension is necessary.

That is the wrong approach to a policy challenge of this magnitude.

The City should not be forced to justify the need for additional time only after the six-month deadline has arrived. Once projects are waiting in the development pipeline, the political and legal pressure to allow them to proceed is likely to increase. Extending a moratorium at that point may be substantially more difficult than establishing a sufficiently long moratorium at the outset.

The better approach is to establish a moratorium that provides adequate time to complete the necessary work in the first instance. The duration of the moratorium should be based on the time required to answer the City's critical questions and establish appropriate safeguards—not on an arbitrary six-month deadline.

Raleigh must evaluate cumulative impacts

Finally, any moratorium adopted by Raleigh should address cumulative impacts, not simply the impacts of individual facilities considered in isolation.

The proposed moratorium would allow certain smaller-scale data center projects to continue moving forward during the period in which the City is ostensibly studying the

impacts of data center development. This approach undermines the purpose of the moratorium.

A data center that appears manageable when evaluated individually may contribute to significant cumulative impacts when considered alongside other existing and proposed facilities. Multiple facilities can collectively increase demands on:

- municipal water supplies;
- wastewater treatment capacity;
- electrical generation and transmission infrastructure;
- land and impervious surface;
- stormwater systems;
- air quality;
- noise and other community impacts; and
- regional natural resources.

The fact that an individual facility falls below a particular size threshold does not mean that its impacts are insignificant. A series of smaller facilities can collectively produce substantial impacts that would not be apparent through project-by-project review.

For this reason, **Raleigh should pause all new data center construction during the moratorium**, including smaller-scale facilities that would otherwise be permitted to proceed. Allowing new projects to continue construction while the City studies cumulative impacts would make it more difficult, not easier, to understand the full scope of those impacts and establish appropriate safeguards.

Conclusion

Raleigh has an opportunity to take a deliberate and precautionary approach to an unprecedented wave of industrial development.

Sound Rivers supports a moratorium because the City needs time to understand the full implications of data center development and establish appropriate protections before additional facilities are approved. But that work cannot responsibly be confined to a six-month window.

The City should adopt a moratorium of sufficient duration to complete the necessary scientific, technical, infrastructure, and policy analysis; ensure meaningful public participation; and establish enforceable safeguards for water resources, infrastructure, communities, and the environment.

The moratorium should also apply to all new data center construction, so that the City can meaningfully evaluate cumulative impacts rather than continuing to add projects to the very system it is attempting to study.

Raleigh should do what's necessary to protect its residents from impacts in the face of this exploding industry. It should use this opportunity to establish a thoughtful, science-based framework that protects Raleigh's water resources, infrastructure, communities, and long-term resilience.

Thank you for your leadership and important service.

Signed,
Samantha Krop
Neuse Riverkeeper and Director of Advocacy
Sound Rivers