

Insert Date

To: Department of Natural Resources and Environmental Control, Coastal Zone Act Program
CZA_Program@delaware.gov

or by mail to:

CZA Program

100 W. Water St., Suite 7B

Dover, DE 19904

Subject: Project Washington Data Center Status Decision (Project CZA-448SD)

Dear Secretary Patterson,

My name is [insert full name], and I am a member of the Sierra Club Delaware Chapter residing at [insert address]. Thank you for the opportunity to comment on the Project Washington Data Center Status Decision. I strongly believe the Data Center is incompatible with the Coastal Zone, has the potential to cause significant environmental harm, and therefore, it should not be permitted.

In June 1971, the State of Delaware, motivated by concerns over the industrialization of its coast, made a crucial decision to prioritize coastal resource preservation over unrestricted industrial growth by enacting the Delaware Coastal Zone Act (CZA). According to the first section of the CZA, it is the public policy of the State to control the location, extent, and type of industrial development in Delaware's coastal areas. As you are aware, the CZA prioritizes protecting coastal resources over the interests of industrial development by completely prohibiting certain uses, such as new heavy industry, because of the environmental threats they pose. As explained more fully below, because of the size, scope, and industrial nature of the Data Center, DNREC is obligated to fulfill the legislative intent of the CZA and prohibit the Data Center.

The Data Center, a new hyperscale campus with massive energy demand, hundreds of industrial generators, diesel fuel tanks, substations, and switchyards, is the exact type of heavy industrial complex that the CZA was enacted to prevent in the Coastal Zone. The Data Center will occupy 579 acres and be one of the largest industrial developments in the Delaware coastal corridor. The CZA defines prohibited heavy industry, in part, by reference to a use in excess of 20 acres with industrial characteristics such as tanks. The Data Center is nearly 29 times the size of a prohibited industrial site, and the number of tanks makes it a prohibited use both as heavy industry and as a tank farm. The Data Center application also fails to analyze the environmental justice impacts on citizens who live and work near this massive proposed use.

The definition of prohibited heavy industry in the CZA also includes an industry, like the Data Center, that has the potential to pollute when equipment malfunctions or human error occurs. The Data Center will create air pollution in the Coastal Zone. The Data Center will have 516 emergency generators, each with a 5,020-gallon diesel fuel tank. The Data Center application provides air emissions data based on testing and a worst case scenario, but fails to provide a cumulative analysis for simultaneous startup of the many generator units, nor does it include a regional air impacts assessment. The application also does not explore the possibility of a leak or spill of the 2,590,320 gallons of diesel fuel in the Coastal Zone due to equipment malfunction or human error, as required by the CZA.

The Data Center will impact water availability and wastewater treatment in the area. According to the application, the Data Center will discharge 2,737,500 gallons per year to a permitted wastewater treatment facility. Despite cooling systems being vital to the operation of a data center, the Data Center application provides that advanced cooling options for the Center are still being explored. Given the size of the Data Center, the proposed water usage appears low and likely underestimates cooling needs at full build-out. The application also fails to include impacts on the water supply during drought conditions or times of competing regional demands.

As is typical in Delaware's Coastal Zone, the Data Center site contains wetlands, and sensitive species such as monarch butterflies, the tri-colored bat, and the northern long-eared bat that may occur on or adjacent to the property. The size and nature of the Data Center will detrimentally impact nearby wetlands and sensitive species through noise pollution, altered hydrology, increased stormwater runoff, and sedimentation during construction. The prohibitions in the CZA were meant to protect the fragile ecosystems within Delaware's coastal corridor; therefore, DNREC should prohibit this use in the Coastal Zone.

For all of the reasons outlined in this comment, I urge you to protect Delaware's Coastal Zone from this proposed use, and I thank you for considering my comments.

Sincerely,

[Your Name]

[Your Contact Information]