

January 12, 2026

To: Department of Natural Resources and Environmental Control, Coastal Zone Act Program
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 Jeffrey Q. [REDACTED], and I am a Delaware resident [REDACTED]
[REDACTED] 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 due to its potential to cause significant environmental harm and therefore should not be permitted.

According to the first section of the Delaware Coastal Zone Act (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 industrial development interests by completely prohibiting certain uses, such as new heavy industry, because of the environmental threats they pose. As explained more fully below, given 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 proposed Data Center is precisely the type of heavy industrial complex the Coastal Zone Act was intended to prevent; it would require massive energy demand, hundreds of generators, diesel fuel tanks, substations, and switchyards. Spanning 579 acres, it would be one of the largest industrial developments in Delaware's coastal corridor. The CZA prohibits industrial uses exceeding 20 acres with features such as tanks; at nearly 29 times that size, the project qualifies as prohibited heavy industry and a tank farm. The application also fails to assess the environmental justice impacts on nearby communities.

The CZA's definition of prohibited heavy industry includes uses, such as the proposed Data Center, that pose pollution risks from equipment malfunctions or human error. The project would introduce significant air pollution to the Coastal Zone through 516 emergency generators, each paired with a 5,020-gallon diesel tank. While the application provides limited emissions data, it fails to analyze cumulative impacts from simultaneous generator startups or regional air quality effects, and it does not assess the risk of leaks or spills from more than 2.59 million gallons of diesel fuel, as required by the CZA.

The proposed Data Center would significantly affect local water availability and wastewater systems, discharging an estimated 2.74 million gallons per year to a permitted treatment facility. Although cooling is central to data center operations, the application notes that advanced cooling options are still under review, and the projected water use likely understates needs at full build-out. The application also fails to assess impacts on water supply during droughts or periods of competing regional demand.

The Data Center site contains wetlands and may support sensitive species, including monarch butterflies, turtles, and protected bat species. The project's size and intensity would harm wetlands and wildlife through noise, altered hydrology, increased stormwater runoff, and construction-related sedimentation. Because the CZA is intended to protect these fragile coastal ecosystems, 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,

Jeffrey C. [REDACTED]
[REDACTED]