

[REDACTED]

From: a [REDACTED]
Sent: Monday, January 12, 2026 4:50 PM
To: CZA, Program (MailBox Resources)
Cc: [REDACTED]
Subject: Project Washington Data Center Status Decision (Project CZA-448SD)

Dear Secretary Patterson,

My name is Alfred F [REDACTED], and I am a life-long [REDACTED]
[REDACTED]

Thank you for the opportunity to comment on the Project Washington Data Center Status Decision. It is my strong belief that the Data Center is incompatible with the Coastal Zone, and by its' massive size and thirst for resources has the potential to cause extensive and significant environmental harm. I believe, therefore that it should not be permitted.

The Coastal Zone Act was passed in 1971 in response to the threat of unregulated industrial development of Delaware's fragile coastal ecosystems. The State Legislature wisely embraced the needs of present and future Delaware citizens to have a safe and healthy environment while responsibly accommodating economic development. Thus, in accordance with those goals, the first section of the CZA specifies the 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 prohibiting new, heavy industrial operation because of the environmental threats they pose. I will explain in further detail 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 proposed Project Washington is a Hyper Scale Data Center (HSDC) campus and would, at 579 acres, be one of the largest industrial developments in Delaware's history, and one of the largest HSDCs in the United States. The Data Center will come with massive energy and water demands, requiring hundreds of back-up diesel generators and draw upon dwindling supplies of fresh water. The effects of 24 hour industrial operations on local communities from constant noise is also known to damage public health and the environment.

Currently, the Data Center campus would be on two parcels of land; the South Parcel, on Gov. Lea Rd. is zoned Industrial, while the North Parcel, on Hamburg Rd. is zoned Agricultural / Residential. Approval of the Data Center would effectively expand the Industrial zone within the Coastal Zone, which is prohibited.

The Data Center, by the applicants estimates, would require 1.2giga-watts of electrical energy- more than the total electric consumption of all the residences in Delaware. The regional electric grid, operated by PJM is unable to deliver that amount of energy, let alone reliably. In 2025 alone, NRGCS / Delmarva Power issued 11 (eleven) Maximum Emergency Generation Alert notices to large commercial and institutional Delmarva Power customers. These notices prepare large energy users to reduce their energy use to contractually agreed upon limits to maintain grid reliability and prevent power outages. The Maximum Emergency Generation Alerts were issued on 21Jan, 22,23,24 June, 14,15 July, 23,24, and 27 July 2025. Additionally, the operators of 24 PJM power generation units

have applied to deactivate those units, due to age or inefficiency, however the deactivation requests were denied or postponed by the Federal Energy Regulatory Commission (FERC) citing the need to maintain grid capacity and reliability. This is hardly the applicant's statement that there would be enough energy for all. All energy shortfalls would have to be made up on site by operating 516 locomotive sized Diesel generators. The Alert notices alone would account for 264 generator run hours out of the 500 hours projected in the Data Center's worst case scenario annual estimate of on-site power generation. The air pollution, heat and additional noise from operating these generators on the dates of the above noted Alerts would have occurred in June and July, usually a period noted for poor air quality, and Air Quality Alert public notices.

This would also be harmful to nearby wildlife and local residents.

The Data Center will use a massive amount of electricity, and most of that energy will be converted to heat, which will cause the data processing equipment to fail, if not managed and removed to the outside environment. The amount of cooling water necessary to operate this facility has never been fully disclosed by Project Washington, as it will ultimately depend on what method is selected. Closed loop cooling would consume the least amount of potable water, but drive-up electricity usage with hundreds of cooling towers and fans. Single pass or open loop cooling would consume more potable water, but with a reduction in energy consumption. Since the Project Washington Data Center is being proposed by investors, it will probably be the option with the lowest initial cost.

The Data Center proposes to use local water sourced from wells. The draw down on local aquifers is unknown at this time, as a cooling method has not yet been identified. The Potomac and Columbian Aquifers are already under stress from recent regional droughts, other municipal and commercial consumption, and the legacy of many Superfund landfill sites along the Route 9 corridor south of New Castle, including Standard Chlorine / Metachem, which is adjacent to the Data Center. Underground toxic contamination of these waters are listed by DNREC and the EPA as not being contained, so it is more than a probability that plumes of this widespread contamination will be drawn towards the Data Center wellheads. Local municipal and public utility wells will be in a tug of war against the Data Center for available clean water resources, contamination plumes may migrate unpredictably, and the water table will certainly drop, having a negative impact on local flora and fauna, with some wells and natural sources drying up. Without a solid, enforceable water use plan, there is no factual basis to conduct a science-based study of the potential long range environmental impact to the Coastal Zone and neighboring communities. This alone is another reason for denying the Data Center application.

The investors of the Project Washington Data Center have not been transparent, at least with the Citizens of the local communities with regard to eventual ownership and operation of the Data Center. Their only assurances are for fluctuating permanent job numbers, that there will be plenty of energy and water for all, and they will be beneficial to the community. We have had investors come to Delaware before with many promises that were taken at face value... the Standard Chlorine / Metachem story is one such cautionary tale, hundreds of millions in environmental damage that is still a problem after 20 years. Metachem promised to pay for site cleanup out of operating revenues. That proved to be an empty promise too.

I urge you to prohibit the Project Washington Data Center and move to preserve our precious and irreplaceable Costal Zone

Respectfully,
Al F [REDACTED]