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To: [CZA, Program \(MailBox Resources\)](#)
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This project breaks the rules. The Coastal Zone Act bans new heavy industry except at 14 specific sites grandfathered in 1971. Even the 2017 amendments only opened those 14 sites to new heavy industry—nowhere else. Project Washington isn't at one of those sites. It has no legal pathway.

Data centers don't "manufacture" anything. The Act permits manufacturing—the physical transformation of materials into new products. Computers processing data don't fit. If it's not manufacturing and not at a grandfathered site, the Coastal Zone Act prohibits it.

250 diesel generators poison the air. The Act explicitly bans refineries, incinerators, and industrial polluters. These backup generators create the same toxic emissions the law was written to stop.

The grid can't handle it. Project Washington would drain 1.2 gigawatts—more power than every Delaware home combined. The Coastal Zone Act protects our coast "primarily for recreation and tourism," not industrial energy extraction that drives up everyone's bills. Rising seas will swallow it. Coastal zone permits now require proof that the site can withstand sea level rise and coastal storms. Delaware City sits in a flood zone facing decades of climate threats.

The law demands zero harm. Permit applicants must prove "no negative environmental impact on the Coastal Zone." Project Washington's energy drain, water use, diesel emissions, and industrial noise make that impossible.

Thank You

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