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attached file.



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The Washington State Department of Ecology's proposed general permit limiting central Washington data centers to 21 emergency diesel generators with 4,423 total brake horsepower creates arbitrary restrictions that undermine industry standards, economic development, and environmental goals.

Technical Standards Conflict

The numerical cap prevents construction of Tier III and Tier IV data centers required for enterprise and hyperscale operations. Modern facilities need N+1 or 2N backup configurations, with large campuses requiring 1:1 backup generation capacity. The 21-generator limit caps facilities at roughly 69.3 MW, well below the 100+ MW needed for hyperscale deployments and many mid-sized enterprise facilities. This makes projects nonviable for providers with minimum availability requirements.

Generators run primarily for maintenance and testing, not emergencies. Monthly load-bank testing and annual full-load testing ensure system readiness and emissions control performance. Limiting generator numbers forces operators to choose between adequate redundancy and essential testing, increasing equipment failure risk and reducing environmental performance. Grant County data shows unplanned outages are rare and generators run almost exclusively for maintenance.

Economic Impact

The restriction threatens Washington's rural data center economy. Data centers provide significant local tax revenue, high-paying permanent jobs, construction employment, and substantial property value. Constraining facility capacity will divert investment to states with flexible, performance-based regulations, undermining Washington's economic development goals.

Regulatory Comparison

Peer states regulate generator emissions without fixed numerical caps through runtime limits, emissions monitoring, load thresholds, air quality assessments, and emergency equipment exemptions. These performance-based approaches protect environmental standards while enabling large, reliable facilities. Washington's prescriptive cap creates competitive disadvantages against regional and national alternatives.

Recommendation

Vantage Data Centers urges the Department of Ecology to collaborate with industry stakeholders through January 2025 to develop guidance that also meets state wide environmental objectives.

Sincerely,

Michael Depaola – Senior Manager Public Policy – West NA

A handwritten signature in dark ink, appearing to read 'Michael Depaola', is written over a light grey rectangular background.