I am submitting this comment in opposition to the proposed approval of Sabey Data Center's Building E Notice of Construction application at 4405 Grant Road in East Wenatchee.

I live just down the hill from this facility. For me and other nearby residents, this is not an abstract discussion about economic development or technology infrastructure. It is an expansion of a major industrial facility immediately uphill from our homes, and it would add 15 large diesel emergency generators and authorize substantial additional air pollution.

According to the draft permit information, this expansion could result in annual emission increases of approximately 35 tons of nitrogen oxides (NOx), 6.96 tons of carbon monoxide, 2.1 tons of particulate matter, including PM2.5, 1.5 tons of volatile organic compounds, and 0.64 tons of diesel engine exhaust particulate.

I understand that Ecology has determined that the proposal can satisfy the requirements of Chapter 173-400 WAC. However, regulatory compliance should not end the discussion about whether continued expansion is appropriate or whether nearby residents are being adequately protected.

Diesel generators are not emission-free simply because they are classified as "emergency" equipment. They must be periodically tested and maintained, and they may operate during power interruptions. Diesel combustion produces nitrogen oxides and fine particulate pollution. PM2.5 is particularly concerning because these particles are small enough to penetrate deeply into the lungs.

I am also concerned about the cumulative impact of this development. This application should not be evaluated as though Building E exists in isolation. It is an expansion of an existing data center campus. Residents experience the cumulative effects of the entire facility—not individual permits considered one at a time.

I therefore ask Ecology to evaluate and clearly disclose:

1. The cumulative air-quality impacts of all existing, permitted, and proposed diesel generators at the entire Intergate Columbia II campus, rather than only the incremental emissions associated with this application.
2. Expected concentrations of diesel particulate matter, PM2.5, and NOx in the residential areas downhill and surrounding the facility, including under realistic local wind, inversion, and topographic conditions.
3. The potential health impacts to people living closest to the facility, including children, older adults, and people with respiratory or cardiovascular vulnerabilities.
4. The combined emissions that could occur during an actual power outage when multiple generators operate simultaneously, rather than relying primarily on assumptions regarding routine annual operation.
5. Whether cleaner backup technologies, battery storage, lower-emission generators, renewable-energy integration, or other alternatives could reduce reliance on diesel generation.

I am also concerned about the broader environmental consequences of continued data-center expansion in our region. Data centers are extremely energy-intensive facilities. Lawrence Berkeley National Laboratory estimated that U.S. data centers consumed approximately 4.4% of the nation's electricity in 2023, and their electricity demand is growing rapidly. This places increasingly significant demands on electrical infrastructure and energy resources.

Water deserves similar scrutiny. Data-center water use varies substantially depending on cooling technology, and some modern facilities can greatly reduce direct water consumption through closed-loop systems. That makes it especially important for Sabey to publicly disclose exactly what cooling technology Building E and the larger East Wenatchee campus use, how much water the campus currently consumes, the source of that water, projected consumption after expansion, and what conservation measures are being implemented. In a region where water is an essential and limited resource, the public should not have to speculate about this information.

There is also a larger question about cumulative development in North Central Washington. Our inexpensive hydroelectric power, available land, and infrastructure make this region attractive to large data-center operators. Those advantages are resources belonging to and relied upon by the communities that already live here. Expansion should therefore come with an exceptionally high standard for transparency and environmental protection.

The benefits of these projects must be weighed against the costs borne locally: industrial development, enormous electricity demand, diesel emissions, potential water consumption, noise, generator testing, infrastructure demands, and the cumulative environmental footprint of continued expansion.

Those impacts are particularly meaningful to those of us who live immediately adjacent to these facilities.

I am not comfortable with simply concluding that because this individual application meets minimum regulatory requirements, another expansion should be approved. At some point we must consider the cumulative impact of repeatedly adding industrial data-center capacity to the Wenatchee Valley.

I respectfully request that Ecology not issue final approval until it has fully addressed cumulative air-quality and health impacts, clearly disclosed the facility's water and energy demands, evaluated impacts on the closest residential neighborhoods, and demonstrated that reasonable cleaner alternatives to additional diesel generation have been thoroughly considered.

I also request that my comment be included in the official record and that Ecology provide substantive responses to these concerns before issuing a final decision.