

# Delaware Nature Society

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TO: Kevin Coyle, DNREC, Office of the Secretary  
Robert Haynes, DNREC Hearing Officer

FROM: Brenna Goggin, Environmental Advocate  
Seth Ross, Board Member  
Richard Fleming, Board Member

DATE: March 6, 2012

SUBJECT: Diamond State Generation-Bloom Energy

The Delaware Nature Society is a private, non-profit, membership organization with more than 8,000 members statewide that works to foster understanding, appreciation, and enjoyment of the natural world through education, advocacy, and preservation. The Delaware Nature Society has been a strong supporter of Delaware's Coastal Zone Act since its inception and has reviewed and provided comments on numerous Coastal Zone applications.

The Delaware Nature Society has concerns and questions regarding Bloom Energy's proposed offsets.

The Coastal Zone Regulations are "designed to promote improvement of the environment within the Coastal Zone ..." Bloom has not shown how their proposed offsets will accomplish this.

It is unclear how emission reductions 'within the PJM grid' are 'clearly and demonstrably more beneficial to the environment in the Delaware's Coastal Zone', as required by the regulations. The locations of the referenced power plants within the PJM grid are not specified. But it is unlikely that changes in their operation, resulting directly from startup of the applicant's facility, will result in clear and demonstrable improvement in air quality in Delaware's Coastal Zone.

We believe DNREC should require a revised offset proposal.

Thank you for the opportunity to comment.