Public Testimony on the Phase III of the Project Zodiac Data Center Section 401 Water Quality Certificate – WQC001454

Thursday, April 30, 2026

Good afternoon,

Thank you for the opportunity to speak today. I am the Water Science and Sustainability Specialist for the Hoosier Environmental Council, a statewide nonprofit that advocates for environmentally beneficial development and policies.

I would like to highlight some primary concerns from our more in-depth technical comments related to this Section 401 Water Quality Certificate for Phase III of the Project Zodiac Data Center in Fort Wayne, Indiana.

This proposed Application represent a substantial threat to the water quality of Adams Ditch, which has been on IDEM's impaired waterways list for at least six years. It will also destroy a portion of a mature swamp, which is a rare ecosystem in Indiana. In addition to these primary water quality concerns, HEC also believes that:

- The Application is lacking critical information regarding the analysis of practical alternatives to the proposed wetland and stream impacts,
- The Application is contrary to the overall goals set forth in Indiana's Water Quality Standards,
- The Application contains incorrect information on the total number of buildings as part of the Phase III expansion,
- Indiana's wetland mitigation program is failing to replace wetlands needed to protect water quality and must be utilized as a last resort.

Time and time again, wetlands are continually being streamlined for destruction despite not only having a demonstrated need to protect them, but also a legal pathway for doing so. HEC believes in balancing economic development and the preservation of our natural environment, but something is happening at the state level that indicates economic interests and being favored over environmental ones. Balancing development means that those in power who are making decisions on behalf our environment and economy understand that without a functioning, healthy environment and robust water quality, we no longer have a strong foundation to continue to do business.

If Indiana desires to be a business-friendly state, then the state ought to become serious about protecting Indiana's water quality and Hoosiers. Being business-friendly is not synonymous with approving every single development. It means maintaining a sustainable and healthy environment where business can continue to be conducted and thrive.

For these reasons, we are requesting that IDEM deny the Application to protect water quality and the public health of Hoosiers.

With regards,

Susie McGovern

Water Science and Sustainability Specialist

Hoosier Environmental Council