

From: [lorraine](#)
To: [CZA, Program \(MailBox Resources\)](#)
Subject: PROJECT CZA-448SD
Date: Sunday, January 11, 2026 11:05:03 PM

Dear DNREC Coastal Zone Review representative:

The Coastal Zone Act, signed in 1971 is considered to be the most important piece of environmental legislation ever passed in Delaware. The goal of the CZA is to “protect the natural environment of the bay and coastal areas and to “safeguard their use.” The CZA prioritizes protecting the coastal resources over the interests of industrial development by completely prohibiting certain uses, such as new heavy industry, because of the environmental threats they pose. It states that heavy industry is incompatible with the protection of the natural environment. As you know, the application from Starwood Digital Ventures (SDV) for its Project Washington hyperscale data center is as lofty as is its immense energy and water supply requirements, usage, and costs and its negative impact to the environment, and adverse impact on the welfare of the people who call Delaware home. As explained more fully below, because of the size, scope, and industrial nature of the Project Washington Data Center, DNREC is obligated to fulfill the legislative intent of the CZA and prohibit the Project Washington Data Center from being built and operated in the Coastal Zone area.

The Project details include 6.1 million square feet of land, 11 immense buildings (500,000 to 600,000 square feet *each* one! That is about 9 football fields for *each* building!) on about 580 acres of land (that is almost one square mile!) that is in the Coastal Zone. The data center is almost 29 times the size of a prohibited industrial site! This and other infrastructure and parking lots will be built on impervious surfacing, preventing rainwater from soaking in and potentially causing stormwater runoff leading to pollutants being carried into waterways. This can result in degrading water quality, harming aquatic life, reduce groundwater recharge and contribute to urban heat islands.

Then, there is the immense concern regarding the amount of water that is needed for the operation of this massive data center. For cooling, the center would use about 13.5 million gallons of water a year in a closed-loop system. (SDV has previously stated they would not use open-loop systems) in their massive cooling arrays. According to current research, SDV states that they will now employ a best-in-class low-pressure pumped refrigerant system to remove heat without consuming water. Who will be tasked with confirming that this data center will actually use this more environmental-friendly but costlier system, as Counties in other States have experienced a bait-and-switch occurrence? This project also requires a massive energy demand, necessitating hundreds of industrial generators, diesel fuel tanks, substations, and switchyards. This is the exact type of heavy industrial complex that the CZA was enacted to prevent in the Coastal Zone. The CZA defines prohibited heavy industry, in part, by reference to uses exceeding 20 acres with industrial characteristics, such as tanks. The PW Data Center will have 516 noisy emergency generators, *each* with a 5,020-gallon diesel fuel tank the size of a train box car that spews fine particulate matter that can travel hundreds of miles, evade fine filtration systems, and enter deep into our lungs, potentially causing or exasperating pulmonary and heart disease. The PW application also does not explore the possibility of a leak or spill of the 2,590,320 gallons of diesel fuel in the Coastal Zone, as required by the CZA. The number of tanks makes it a prohibited use both as heavy industry and as a tank farm. The Data Center application also fails to analyze the full impacts on the environment and the residents who live and work in close proximity to the site of this proposed massive data center. Due to potential variations of electric supply availability, it is likely the 516 large generators will run much more often than stated in their application. Several Counties report that the “back-up” generators are operating 24/7/365 due to low or unavailable electricity supply! Delaware generates less than 20% of its electric needs and relies on out-of-state suppliers to fulfill the rest. This can lead to electric blackouts and

significant increases in people's electric bills (as realized in many Counties that allowed unregulated hyperscale data centers). These generators also make a low frequency noise that can be "felt" in people with autism, leading to distractibility, irritability, agitation, and undesirable atypical behavior due to the stress it causes. Numerous children have seen their grades negatively impacted and several have been disciplined due to their sudden atypical behavioral changes, not realizing that it is attributed to the low frequency noise. There is an elementary school less than three miles from the site of the proposed data center that has over one thousand students and possibly 35 or more children on the autism spectrum. This preventable travesty could create life-long detrimental effects on the wellbeing of this population of people!

For over 54 years, the Coastal Zone Act has protected Delaware's coast from the destructive impacts of heavy industrialization and commercial developments. The success of the Coastal Zone Ace requires vigilance on the part of Delaware's legislators and citizens to fulfill the legislative intent of the CZA and keep the door shut from any attempts to bypass or not enforce it. It is imperative for Delaware to balance its environmental, economic, and human wellbeing; however, permitting heavy industry that brings little economic benefits and considerable negative - and some irrevocable - impacts on the environment, on our precious natural resources, and on the health, wellbeing and quality of life for the residents is NOT a feasible part of the equation!

I am officially requesting DNREC to declare that this Project Washington data center – and all similar future proposed data centers, should not be permitted in the Coastal Zone and that they will deny the PW application.

DNREC should also allow for a public meeting in January to discuss the impacts of this massive plan. The public deserves full transparency and the right to their concerns addressed at a public meeting.

With Best Regards,

Lorraine [REDACTED] S [REDACTED]

