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To: [CZA, Program \(MailBox Resources\)](#)
Subject: Project Washington Coastal Zone application denial
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The Project Washington, HyperScale Mega Data Center, application submitted by Starwood, for inclusion in the Coastal Zone is totally inappropriate under the CZA.

This project is planned as a huge industrial enterprise inappropriate and incompatible with the protections included in the CZA.

What Types of Decisions are Made in Regulating the Coastal Zone?

DNREC must determine whether a proposed activity would be prohibited,

The Coastal Zone Act prohibits “heavy industry”. It cites specific examples, such as Steel Manufacturing and Paper Mills, huge users of water and electricity and generating heat, noise and environmental problems. One would think logically that a similar facility essentially a bulk data transfer facility would be banned.

Starwood’s Project Washington proposed Industrial Campus is roughly equivalent to using the Electrical Power of A Steel Mill with an electric Furnace, and will consume water at a rate similar to Paper Mill, while generating even more environmental damage, noise, and pollution at levels not disclosed in their filing.

What Criteria are Evaluated to Make a Coastal Zone Act Decision?

DNREC evaluates:

- Environmental impacts - The hundreds of acres (much more than 20) to be disturbed, Electrical Power requirements over 1 GW, hundreds of “backup” Generators running on standby or full time in case of brownouts or blackouts of the electric supply, and the attendant unspecified pollution, as well as the liability of storage for hundreds of thousands of gallons of Diesel fuel in tanks on site, also producing noise and water usage on an order of magnitude greater than any acceptable usage.
- Economic effects - minimal after construction. Abandonment could cause problems.
- Aesthetic effects - totally out of place for recreation and Coastal activities.
- Number and type of supporting facilities (and impacts of such facilities) - include electrical supply substations, water processing both intake and output for cooling demands.
- Neighboring land uses (including effects on adjacent residential areas) - nearby

refinery was grandfathered with original CZA, also a SuperFund site, Any nearby land would suffer from a constant 24 hours / 7 days a week continuous noise from the fans and running water used for cooling, a hum and separate low frequency ground shaking vibration, plus additional noise when the **on site** generators run.

- Consistency with county and municipal comprehensive planning - 1 site is zoned for "business use including data centers", but they were not envisioned as the huge HyperScale Mega Data Center proposed; the other parcel would require rezoning.

Protect Delaware's Coastal areas by enforcing the Coastal Zone Act. Thank You.

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Sent from my iPad