

From: [Betty \[REDACTED\]](#)
To: [CZA, Program \(MailBox Resources\)](#)
Subject: Project CZA-446SD Starwood DataCenter Campus
Date: Monday, January 12, 2026 3:33:36 PM

Dear DNREC Coastal Zone Review representative (Project CZA-448SD):

The Coastal Zone Act in Delaware enacted in 1971 and rules further detailed in 2019 prioritizes protecting 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. The application from Starwood is huge (6.1 million sq ft), will contain massive cooling systems, will consume as much energy as the entire state does, potentially use huge amounts of water, and create significant noise and environmental pollution from 516 railcar-sized auxiliary generators. By any definition, this is a large heavy industrial facility. As explained more fully below, because of the size, scope, and industrial nature of the Data Center, DNREC needs to fulfill the legislative intent of the CZA and prohibit the Data Center.

The Data Center, a new hyper-scale campus with massive energy demand, hundreds of industrial generators, diesel fuel tanks, substations, and switchyards, is the exact type of heavy industrial complex that the CZA was enacted to prevent in our Coastal Zone. The Data Center will occupy 579 acres exceeding the 20 acre industrial characteristic of heavy industrial use and includes a required fuel tank farm to support the hundreds of generators to support their zero outage requirements. The Starwood proposed Data Center is nearly 29 times the size of a prohibited industrial site, and 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 environmental full impacts on citizens, wildlife and waterways near this massive, proposed use. Red Lion Creek is a tidal body of water connected to the Delaware river and also vulnerable to even higher levels during exceedingly unpredictable weather events. With the Red Lion Creek located amidst the Data Center complex surrounded by 516 emergency generators, each with a 5,020-gallon diesel fuel tank the application does not address the possibility of a leak or spill of the 2,590,320 gallons of diesel fuel in the Coastal Zone. Other cooling water or coolant leaks also have the potential for additional damaging contamination. Due to potential variations of electric supply availability, it is likely that the 516 large generators will run much more often than stated in their application.

Having not previously known the DNREC CZA definitions, I now view this campus as clearly defined heavy industrial use and as such should not be given approval of their application as requested. If ironically DNREC by some other definition chooses this to be a permitted application, the details required must be extremely stringent to cover any and all possible events and releases via explicitly defined preventative procedures and equipment in order to protect the waterways & land areas and their occupants human and wildlife from negative effects and long term harm with an expansive DNREC monitoring and immediate remediation plan.

DNREC should also allow for a public meeting in January to discuss this massive plan. The

public deserves the right to address their concerns via a public meeting.

Sincerely,

Betty K

A large black rectangular redaction box covers the signature area, obscuring the name and any handwritten notes.

Sent from my iPad