



January 12, 2026

CZA Program
DNREC Division of Climate, Coastal & Energy
100 W. Water St., Suite 7B
Dover, DE 19904
CZA_Program@delaware.gov

Re: Comments on Starwood Digital Ventures CZA Status Decision Request – Project Washington (CZA-448SD)

Dear Secretary Patterson and Coastal Zone Act Program Staff:

Thank you for this opportunity to provide public comments and feedback on the Starwood Digital Ventures CZA Status Decision Request for Project Washington (CZA-448SD). Following extensive dialogues with New Castle County residents, upholding the integrity of the Coastal Zone Act (CZA) remains essential for safeguarding Delaware's fragile ecosystems. Strict adherence to these regulations ensures that industrial growth does not come at the expense of our residential ratepayers or adversely impact the ecological health of our coastal zone. We appreciate your continued efforts to protect Delaware's 115 miles of coastline, ensuring these resources remain resilient and accessible for future generations.

According to Delaware Code, Title 7 – Conservation, Ch. 70, Coastal Zone Act:

§ 7001. Purpose.

"While it is the declared public policy of the State to encourage the introduction of new industry into Delaware, the protection of the environment, natural beauty and recreation potential of the State is also of great concern. In order to strike the correct balance between these 2 policies, careful planning based on a thorough understanding of Delaware's potential and her needs is required."

Starwood Digital Ventures' Project Washington application fails to satisfy the strict liability standards mandated by the CZA. Despite their post-1971 origin, hyperscale data center's massive physical footprints and intensive energy demands qualify them as "heavy industry" (§7002. Section "D"). Starwood's proposed Project Washington complex consisting of 11 multi-story buildings, five substations, a switch station and the installation of 516 emergency generators alongside expansive equipment yards and parking infrastructures, poses significant risks to local air quality, noise levels, and delicate coastal ecosystems. Such a high-density, utility-heavy project is fundamentally incompatible with Delaware's commitment to preserving the ecological integrity of our Coastal Zone.

In addition, Starwood's application fails to adequately mitigate air pollutants, specifically regarding the cumulative impact of its proposed 516 diesel-fired emergency generators on local air quality and ozone levels, which violates CZA prohibitions with the "potential to pollute."

Estimates suggest that the possible usage of these “emergency” generators, (which requires on-site storage of approximately 2.59 million gallons of diesel fuel) for 500 hours, could emit over 1,000 tons of pollutants annually, including nitrogen oxides, particulate matter, and volatile organic compounds. Environmental advocates from the Delaware Sierra Club argue that the sheer number of fuel tanks qualifies the site as a prohibited "tank farm" and a "heavy industry" under the CZA.

Furthermore, the proposal demonstrates a critical underestimation of water usage and discharge requirements for its 1.2 GW cooling systems, threatening local water supplies, and critically neglects the management of increased stormwater runoff and sedimentation that could detrimentally impact protected wetlands and local hydrology. The application also exhibits failure to account for sensitive species and habitats and lacks a comprehensive noise mitigation plan for the constant low-frequency noise generated by cooling fans.

The application also grossly overlooks climate change impacts. It offers insufficient evidence that the proposed facility can withstand projected sea-level rise and extreme coastal storms without risking catastrophic environmental failure. By failing to mitigate the potential for hazardous chemical leaks during flood events, the proposal fundamentally fails to satisfy the CZA guidelines, which require robust proof of environmental protection.

In summary, the Coastal Zone Act was enacted to safeguard our fragile coastline from precisely this type of industrial encroachment. The proposal to store over 2.5 million gallons of diesel fuel and operate 516 generators is an industrial intensive use that the CZA was designed to prevent. Also, approving a project of this industrial magnitude which fails to address a long-term climate-resiliency plan would not only violate the letter of the law but also undermine Delaware’s long-standing commitment to protecting our coastal resources for future generations to come.

Thank you for your time and attention to ensuring full compliance with the state's highest legal and environmental standards in this matter.

Sincerely,

Councilman Kevin Caneco

And

Kiran Wiker, Legislative Assistant