

From: Mark N [REDACTED]
To: [CZA, Program \(MailBox Resources\)](#)
Subject: Starwood/CZA comment
Date: Monday, January 12, 2026 9:26:27 AM
Attachments: [STARWOOD CZA STATUS.pdf](#)

Please consider the comment attached and below on Starwood Digital Venture's CZA status request. Thank you.

Thank you for the opportunity to comment on Starwood Digital Venture's request for a Coastal Zone Act status decision. [REDACTED] is not qualified to determine if the applicant would require a CZA permit. We do, however, respectfully ask DNREC to consider several factors in its decision making.

One aim of Coastal Zone Act was to regulate industrial development. The other was to preserve natural resources. When the CZA was enacted in 1971, there was no way the authors could have anticipated the possibility of enterprises such as large-scale data centers, thus no way to anticipate their environmental impacts or the energy they demand.

Energy use alone could qualify Project Washington as heavy industry. According to media reports, the data center would require 1,200 MW of electricity a year, which is nearly the total combined energy use of the state. Starwood has stated it will buy power on the open market. Assuming that energy will be generated by gas and other fossil fuel-burning plants, such significant usage does not move the state closer to the goal of net zero greenhouse emissions by 2050, as specified in the Climate Solutions for Delaware Act.

Starwood proposes a closed-loop cooling system for Project Washington. It does not, however, specify the temperature or content of the effluent, which could contain harmful PFAS gases and have a detrimental impact on Red Lion Creek.

Finally, even if Project Washington were not to be qualified as heavy industry, it would have a significant, permanent impact on natural resources, altering 579 acres of what is currently open space near several Superfund sites. That total approached the footprint of other heavy industries. The operations footprint of the Delaware City Refinery is about 1,000 acres of its 5,000+ acres. The proposed Project Washington sites currently filter stormwater runoff, serve as valuable habitat for many species of plant and animal, and stores carbon through the roots of crops, trees and wetlands vegetation. Given the alarming rate at which we are losing open spaces and the valuable ecosystem services they provide, we must ask if the trade-off is beneficial.

To be clear, Delaware Nature Society does not have a position for or against large-scale data centers. Our interest in Project Washington is its potential impact on natural resources. Thank you for your consideration.

Submitted by Mark N [REDACTED]

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