

From: Maya P [REDACTED]
Sent: Monday, January 12, 2026 4:31 PM
To: CZA, Program (MailBox Resources)
Subject: PROJECT WASHINGTON VIOLATES THE COASTAL ZONE ACT

Dear Secretary Patterson,

Thank you for the opportunity to comment on the Project Washington Data Center Status Decision. I strongly believe the Data Center is **incompatible** with the Coastal Zone, has the **potential to cause significant environmental harm**, and therefore, it **should not be permitted!!!!**

First, I have lived in Delaware my entire life as a resident of 22 years, and one of the state's greatest assets is its natural coastal environment, particularly the areas where Project Washington proposes to build. The site at 0 River Road is located near Deemers Beach, a well-used riverfront area valued for fishing and recreation. It is also surrounded by calm, secluded natural spaces with biking and walking trails and serves as habitat for numerous native wildlife species. The second proposed location, 825 Governor Lea Road, lies near Red Lion Creek, an area that is similarly vital to local ecosystems and native wildlife. The construction of data centers at these locations would be detrimental to these sensitive environments and is not supported by Delaware residents.

In June 1971, the State of Delaware, motivated by concerns over the industrialization of its coast, made a crucial decision to prioritize coastal resource preservation over unrestricted industrial growth by enacting the Delaware Coastal Zone Act (CZA). According to the first section of the CZA, it is the public policy of the State to control the location, extent, and type of industrial development in Delaware's coastal areas. As you are aware, the CZA prioritizes protecting coastal resources over the interests of industrial development by completely prohibiting certain uses because of the environmental threats they pose. **Due to the size, scope, and industrial nature of the Data Center, DNREC is obligated to fulfill the legislative intent of the CZA and prohibit the Data Center.**

The Data Center, a new hyperscale 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 the Coastal Zone. **The Data Center will occupy 579 acres** and be one of the largest industrial developments in the Delaware coastal corridor. The CZA defines prohibited heavy industry, in part, by reference to uses exceeding 20 acres with industrial characteristics, such as tanks. The Data Center is nearly **29 times the size of a prohibited industrial site**, and the **number of tanks (516 double-walled 5,020-gallon diesel belly fuel tanks) makes it a prohibited use both as heavy industry** and as a tank farm. Additionally, **the Data Center application fails to analyze the environmental justice impacts on citizens** who live and work near this massive proposed use.

The definition of prohibited heavy industry in the CZA also includes industries with the potential to pollute when equipment malfunctions or human error occurs. **The Data Center will create pollution in the Coastal Zone.** The Data Center will have 516 emergency generators, each with a 5,020-gallon diesel fuel tank. The diesel-fired emergency generators **will emit Particulate Matter (PM), Sulfur Oxides (SOx), Nitrogen Oxides (NOx), Carbon Monoxide (CO), and Volatile Organic Compounds (VOC)**. The

Data Center application provides air emissions data based on testing and a worst-case scenario, but fails to provide a cumulative analysis for simultaneous startup of the many generator units, nor does it include a regional air impacts assessment. The 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 Data Center **will impact water availability and wastewater treatment in the area**. According to the application, the **Data Center will discharge 2,737,500 gallons per year to a permitted wastewater treatment facility**. Despite cooling systems being vital to the operation of a data center, the Data Center application provides that **advanced cooling options for the Center are still being explored**. Given the size of the Data Center, the proposed water usage appears low and likely underestimates cooling needs at full build-out. Moreover, Starwood Ventures provides **no information about the extent of Per- and poly fluoroalkylsubstances (PFAS) pollution** from the data center campus. Data centers are known to increase PFAS pollution directly and indirectly through operations such as cooling equipment and directly in the equipment housed in the centers.

As is typical in Delaware's Coastal Zone, the Data Center site contains wetlands, and sensitive species such as monarch butterflies, the tri-colored bat, and the northern long-eared bat that may occur on or adjacent to the property. The **size and nature of the Data Center will detrimentally impact nearby wetlands and sensitive species through noise pollution, altered hydrology, increased stormwater runoff, and sedimentation during construction**. The prohibitions in the CZA were meant to protect the fragile ecosystems within Delaware's coastal corridor; therefore, **DNREC should prohibit this use in the Coastal Zone.**

The applicant is claiming that 7 Del. Admin. 101 § 5.1.5 and 5.1.8 exempts them as they claim to be a "facility used in transmitting, distributing, transforming, switching, and otherwise transporting and converting electrical energy." However, this section was never written with data centers in mind and has historically been applied to renewable energy generation (ie, solar) and public utility infrastructure, and there is a stark difference electrical energy and transforming data **USING** electrical energy.

In addition to the concerns outlined above, the proposed data center does not include a plan to generate its own power and would instead rely on the PJM power grid, which is already under significant strain. To manage energy demand across multiple states, the grid has required scheduled brownouts and blackouts, a burden that would be further exacerbated by this project. As a result, residents could see their electric bills increase by approximately \$70. Once fully operational, the data center near Delaware City is expected to draw 1.2 gigawatts of power from the grid, an outcome that personally I and most residents do not support.

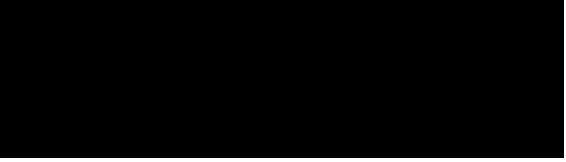
Regardless, sea levels will swallow the proposed data center. Coastal zone permits require proof that the site can withstand sea level and coastal storms. Delaware City sits in a floor zone facing decades of climate threats.

I urge you to protect Delaware's Coastal Zone from this proposed use, and I thank you for considering my comments.

Sincerely,

Maya P [REDACTED]

Maya P [REDACTED]



Thank you,
Maya P [REDACTED]