

From: [Stephanie R \[REDACTED\]](#)
To: [CZA, Program \(MailBox Resources\)](#)
Subject: Starwood Digital
Date: Monday, January 12, 2026 4:25:04 PM

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

The Coastal Zone Act was passed over 50 years ago and has done an excellent job of protecting Delaware's coastal areas from industrialization. The CZA 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 immense (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 is obligated 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 the Coastal Zone. The Data Center will occupy 579 acres and be one of the largest heavy 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 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 who live and work near this massive, proposed use. The Data Center will have 516 emergency generators, each with a 5,020-gallon diesel fuel tank. 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. Due to potential variations of electric supply availability, it is likely the 516 large generators will run much more often than stated in their application.

I am officially asking DNREC to declare that they should not be permitted in the CZ. and deny their application, based on being a heavy industrial facility.

DNREC should also allow for a public meeting in January to discuss this massive plan. The public deserves full transparency and the right to address their concerns at a public meeting.

Sincerely,

Stephanie R [REDACTED]