

From: [Leslie E. \[REDACTED\]](#)
To: [CZA, Program \(MailBox Resources\)](#)
Subject: Project Washington Data Center Status Decision (Project CZA-448SD)-Starwood Ventures
Date: Friday, January 9, 2026 3:10:26 PM

Dear Secretary Patterson:

My name is Bruce [REDACTED], and I am [REDACTED]. I write to state that this Data Center should not be located on a Delaware coastal zone as it provides existing and potential harm to the environment and therefore should be a prohibited use.

My conclusions are based on what is stated in the Starwood Ventures application and what is not covered by their application.

First, the size and magnitude of the project clearly places it in the category of heavy industrial.

The applicant's proposal will impact 579 acres, and includes 5 substations, one switch station and 11 substantial buildings totaling 6.1 million square feet. The application states that it will require 516 diesel-fired generators that will operate at least 20 hours a year. Just general maintenance means that there will be at least one and frequently two generators running at a time. Assuming no electrical shortage, brown out or grid failure generators will be burning fuel and making noise at least 10,320 hours a year. Every day an industrial size generator will be in operation

Stresses on the regional grid, and experiences in other states suggest that a electric shortages will require the generators to be used as back up capacity. The classification standard for the project should be based on the operation of 516 massive generators. Its an expected event. We know it will happen. The amount of pollution and noise from the facility will be massive and the potential for error, mistake and equipment malfunction is also significantly increased.

Related environmental issues.

1. There are 516 separate locations for pollution generation, fuel leak sources and maintainence breakdowns that result in environmental harm. The Data Center will manage, according to it application, 2,590,320 gallons of diesel fuel at 516 sources. Its a management nightmare that multiply the potential for unexpected harm.

The adjacent Delaware Refinery has a very problematic history of maintainence breakdowns or malfunctions that cause discharges in violation of limits. The refinery area is already subject to "unpredictable" discharges that harm the environment and place nearby residents in harm. The addition of a data center should be seen as an exacerbation of the impacted area.

2. Noises from the generators as well as low frequency noise (LFN) have

detrimental impact on wildlife. Science shows that anthropogenic noise has diverse threats to species and ecosystems. Bird and frog species rely on vocal communications. Such noise affects foraging and mating behaviors as well as predator/detection communications. People within 2 miles of data centers state they feel the low frequency noise even when they do not hear it. No data is provided by the applicant regarding low frequency noise. LFN will make worse the problems caused by the sounds humans hear

We know that there will be at least, on average, more than one generator running at a time - the noise will be distributed to 516 locations. The whole site is source of noise. The sound of 516 generators at one time will have a serious impact on animal life.

3. The management of heat generated by the data center is left unaddressed. Stating that all the water will come from a local well and will exit the data center via the county sewer system leaves many important unanswered questions about how heat will be managed and what environmental issues need to be addressed. We know that at least, on average, more than one generator will be running at a time - the noise will be distributed to 516 locations. The whole site is a source of noise pollution.

In summary the size and operational characteristics of the data center point to the fact it should be treated as heavy industrial. No one can predict the health and viability of the future electric grid. We should classify the data center using the same caution the applicant uses - that 516 generators will be used likely more than once and for an unknown duration.

Thank you for the opportunity to make comments. I ask that you use the Delaware Coastal Zone Act to protect our environment and the citizens of Delaware.

Bruce W [REDACTED]
[REDACTED]