

Meade, Eddie (DNREC)

From: Becky J. [REDACTED]
Sent: Thursday, December 11, 2025 4:34 PM
To: CZA, Program (MailBox Resources)
Subject: Formal Opposition to Starwood Digital Ventures Coastal Zone Status Decision Request (Near Tybouts Corner)

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Opposition to Starwood Data Center Coastal Zone Application

Dear DNREC Secretary/Coastal Zone Act Program,

I am writing to formally oppose the Starwood Digital Ventures data center proposal, which is currently under review for a Coastal Zone Act (CZA) Status Decision. The plans, as submitted, reveal significant and unsustainable environmental and infrastructural impacts that make this project a horrible fit for the Coastal Zone and for New Castle County.

The core reasons for my strong opposition are summarized below:

Severe Environmental and Air Quality Impacts

- **Massive Air Pollution:** The estimated annual increase of **over 1,000 tons per year** across various pollutants (PM, SOx, NOx, CO, VOC) from the emergency generators is an unacceptable environmental burden. Allowing such a large source of pollution in or near the Coastal Zone runs counter to the spirit and letter of the CZA.
- **Fuel Storage:** The plan includes 5,020-gallon diesel fuel belly tanks, posing an environmental risk, particularly in a coastal area sensitive to spills and contamination.

Unsustainable Water and Sewer Demands

- **Excessive Water Consumption:** The facility's cooling and humidification needs will require a colossal amount of water. Annual consumption for humidification and potable use alone is projected to be **over 12.6 million gallons per year** (9,933,840 gallons for humidification + 2,737,500 gallons for potable use). Additionally, the cooling system requires a one-time charge of **600,000 gallons**. This level of demand is not justifiable and strains the region's shared water resources.
- **Unfunded Public Infrastructure:** The plan relies on New Castle County **proposing to expand sewer service** to the site. This is a massive public expense and a commitment of public infrastructure primarily for a private, industrial facility.
- **Wastewater Generation:** The facility will discharge approximately **2.7 million gallons of wastewater per year** into the county's sanitary system.

⚡ Extreme Energy and Infrastructure Strain

- **Colossal Energy Use:** The total energy requirement of **1.2 GW** for both phases is enormous. The proposal acknowledges that **offsite enhancements to electrical infrastructure are expected** but fails to provide specific information from Delmarva Power. This lack of detail leaves the public and the state unable to assess the full cost, impact, and feasibility of powering this facility.

🔴 Inappropriate Land Use vs. Minimal Public Benefit

- **Zoning Conflict:** The 579-acre project combines two parcels **not currently zoned for Heavy Industrial use**. Placing this highly-intensive industrial development in this location contradicts sound land-use planning principles for a coastal region.
- **Poor Jobs-to-Impact Ratio:** The massive environmental and infrastructure costs are being incurred for a relatively small continuous workforce of approximately **226 people**. Given that employees are expected to reside across four states (Delaware, Pennsylvania, New Jersey, and Maryland), the local economic benefit is marginal compared to the irreversible, negative state-wide impacts.

For these reasons, the Starwood data center proposal represents a poor and damaging use of land and resources within the Coastal Zone. I urge the DNREC Secretary to issue a decision that prohibits this development or, at minimum, requires a full CZA permit review that addresses these critical shortcomings.

Thank you for considering my concerns during this critical review period.

Sincerely,

Becky [REDACTED]