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To: [CZA, Program \(MailBox Resources\)](#)
Cc: [Lambert, Larry \(LegHall\)](#); [Seigfried, Ray \(LegHall\)](#)
Subject: Opposition to Coastal Zone Act Status Decision Request – Starwood Digital Ventures Data Center and Request for Public Hearing
Date: Friday, December 12, 2025 6:15:21 PM

To Whom It May Concern:

I am writing to formally and unequivocally oppose the Coastal Zone Act (CZA) Status Decision Request submitted by Starwood Digital Ventures for the proposed data center project. After reviewing the nature of the project and its anticipated impacts, I believe that allowing this facility to proceed within the Coastal Zone would directly contradict the purpose and intent of the Delaware Coastal Zone Act and pose unacceptable risks to our environment, public health, natural resources, and community quality of life.

Further, I am deeply concerned that DNREC has not scheduled a public hearing for this Status Decision. While I understand that hearings are mandatory for full permit applications, the environmental significance, scale, and potential harm associated with this project fully justify a public hearing at this preliminary stage. State regulations allow the public to request a hearing when significant public interest or substantive environmental issues exist, and this project clearly meets those criteria.

My objections include:

1. Excessive Electrical Consumption and Resulting Carbon Footprint

Data centers are among the highest consumers of electricity of any modern infrastructure. Beyond increasing costs to ongoing residential customers, the constant and massive power demand will dramatically increase greenhouse gas emissions, strain local electrical systems, and undermine Delaware's commitments to reducing emissions.

2. Substantial Water Usage and Risks to Local Water Supplies

Large-scale data centers often require millions of gallons of water annually for cooling. This introduces serious risks to local aquifers, increases competition with community water needs, and raises concerns about contaminated discharge harming waterways and ecosystems.

3. Noise Pollution and Associated Environmental and Community Impacts

Persistent noise from generators, HVAC systems, and cooling equipment can significantly disrupt residential life and negatively affect wildlife that depend on quiet coastal habitats.

4. Risks of Water Contamination and Chemical Pollution

Chemical additives, coolant fluids, and large fuel storage systems common to data centers pose major contamination risks to wetlands, groundwater, and surrounding ecosystems, especially in a sensitive coastal environment.

A. Diesel Fuel Storage and Generator Risks

The project will require significant on-site storage of diesel fuel to operate backup generators. Diesel storage introduces substantial risks of spills, leaks, soil contamination, and fire hazards. Even minor leaks can migrate quickly in coastal soils, posing long-term threats to groundwater and wetlands.

B. Excess Effluent and Overload of Existing Water Treatment Systems

The cooling and operational processes of a facility of this size will generate large quantities of effluent. Existing wastewater treatment systems in the region are already operating near capacity. Additional effluent from this project risks overwhelming treatment infrastructure, increasing the likelihood of system failures, untreated discharge, and downstream pollution.

C. Minimal Net Public Benefit

The project offers an estimated 300 jobs, a relatively inconsequential benefit when weighed against the significant environmental, infrastructural, and public health risks. The minimal economic return does not justify the statewide impacts this project would impose, especially in a protected coastal zone.

5. Incompatibility with the Purpose and Intent of the Coastal Zone Act

The Coastal Zone Act was designed to restrict new heavy industrial development and protect Delaware's coastal resources. The scale, resource demands, industrial characteristics, and environmental risks of the Starwood data center conflict directly with the protections intended by this legislation.

6. Lack of Demonstrated Public Benefit

The project does not provide a clear or compelling public benefit sufficient to outweigh the environmental and community harm it would cause. The primary beneficiaries are private corporate interests, while the public bears the risks.

Request for Public Hearing

Given the substantial environmental risks, the project's incompatibility with the Coastal Zone Act, and the high degree of public interest, I formally request that DNREC hold a public hearing on this Status Decision before moving forward. The community deserves full transparency, an opportunity to ask questions, and a forum to express concerns about a project that would have long-lasting impacts on our coastal environment and quality of life.

Conclusion

For all of the above reasons, I strongly urge DNREC to deny the Coastal Zone Act Status Decision Request submitted by Starwood Digital Ventures. Additionally, I request that DNREC schedule a public hearing to ensure full public participation in this critical decision.

Sincerely,

Howard S. [REDACTED]

