

From: Andrew M. [REDACTED]
To: CZA, Program (MailBox Resources)
Subject: RE: Comments on Starwood CZA Status Application
Date: Friday, December 19, 2025 12:15:39 PM

RE: Comments on Starwood CZA Status Application as identified on DNREC website as:

October 30, 2025
Project Washington
Starwood Digital Ventures Site

Location:

**0 River Road and 825 Governor Lea Road
New Castle, DE
Tax Parcels 10-049.00-073 and 12-002.00-025**

Dear DNREC :

Pursuant to the Delaware Coastal Zone Act (7 Del. Code Ch. 70), and the Regulations Governing Delaware's Coastal Zone, the Delaware Department of Natural Resources and Environmental Control (DNREC) I am commenting on Coastal Zone Act (CZA) status decision (Project CZA-448SD) from Starwood Digital Ventures (Starwood). It is my understanding that the applicant is seeking a status decision to determine whether or not the development of a data center campus on two contiguous New Castle County, Delaware tax parcels (10-049.00-073 on Hamburg Road and River Road and 12-002.00-025 on Governor Lea Road and South Dupont Highway) requires a CZA permit, is exempt from CZA permitting, or is prohibited by the CZA.

I offer my comments as a resident of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] I am writing to urge DNREC to find that the application noted above is an activity that needs to be regulated by the Delaware Coastal Zone Act. Specifically:

- The magnitude of this project with its massive energy and water demands, hundreds of industrial generators and switchyards looks and

behaves like heavy industry. The applicants claim that it is not heavy industry because it does not manufacture a product is disingenuous and misleading.

- The application does not fully analyze whether this proposed 1.2 GW, 516 generator, 579 acre campus is comparable to heavy industry. Requiring a CZA permit will address this issue in an open and transparent way and allow for appropriate public comment on this matter.
- The application argues that the project is simply three exempt uses: data storage, transmission/distribution of electricity via substations and backup power via emergency generators and therefore are not regulated uses. More appropriately, some would argue that this finding by the applicant is inconsistent with the CZA's purpose and the project's "exempt uses" as described by the applicant. Requiring a CZA permit would directly and clearly address this inconsistency.
- This project's scale and land disturbance is one of the largest new industrial-type developments in the Delaware coastal corridor since the refinery. Treating this massive project as routine and not requiring a CZA permit is unprecedented given its impact on air and water resources. Requiring a CZA permit would clearly and transparently evaluate these impacts.
- Air resource impacts include evaluating the direct emissions from the facility's operations and use of diesel emergency generators; the cumulative and regional air impacts; and the associated fuel storage and tank emissions need to be fully documented. Only through the permit process will these impacts be fairly and thoroughly evaluated.
- Surface water and storm water discharges need to be fully evaluated

beyond simply stating as the applicant does, BMPs will be put in place. This section of Route 9 is periodically flooded from storm events. Nowhere in the application is there a failure mode analysis that details what happens if diesel, transformer or coolant reaches Red Lion Creek.

- Water withdrawals and the stress on supply are not comprehensively addressed in the application. The cited use provided by the applicant of approximately 12.7 million gallon per year appears low. For a 1.2 GW hyperscale campus there should be a better estimate that includes cooling needs once the project is fully built out. This analysis should include what happens under drought conditions, identification of the competing demands for these water resources by other users etc.
- The application is weak in the manner it addresses wetlands and riparian areas. It mentions only that permits may be needed.
- The application is weak in addressing concerns related to threatened and endangered species. No mention is made of the long term impacts this project will have on tri-colored bats, monarch butterfly and the northern long-eared bat. Noise pollution, light pollution, construction impacts and long-term habitat fragmentation are not addressed. Studies have shown that noise and light pollution from data centers cause stress to wildlife altering behaviors such as changing migration routes or fleeing existing habitats effectively creating functional habitat loss in areas adjacent to data center facilities. These impacts need to be addressed.
- Energy use by this project is silent on the associated impacts that will be borne by rate payers. This is unacceptable and needs to be addressed. (We don't need another Bloom-like surcharge surprise on our monthly energy bills.)

In summary, this Project Washington hyperscale data center project should be considered heavy industry. It will require massive energy and water use. The

project's physical scale and environmental impact are significant. The project will consume enormous amounts of electricity and water for cooling, very similar to large factories. The project as described in its application resembles a large industrial complex not compatible with the Coastal Zone of Delaware.

Therefore, I respectfully request that DNREC and Secretary Patterson solicit additional public input to this application. The application is a consultant driven biased interpretation of the Delaware CZA. It fails to understand the intent and purpose of the Act and puts short term economic gains to a few individuals ahead of what is right for Delaware citizens.

DNREC must balance the purported "benefits" touted in the application with the problems that the size and scale of this data center will bring to our coastal zone and quality of life. The proper path forward is to treat this project as a heavy industrial development and require a permit. In this way through an open and transparent permit process and with appropriate public input DNREC will be true to its regulatory and stewardship responsibilities under the CZA.

Respectfully submitted,

Andrew [REDACTED] M [REDACTED]

[REDACTED]