

From: [David C \[REDACTED\]](#)
To: [CZA, Program \(MailBox Resources\)](#)
Cc: [REDACTED]
Subject: Project CZA-448SD Starwood Ventures Project Washington / Hamburg Rd and Gov Lea Rd
Date: Monday, January 12, 2026 3:30:39 PM

Good afternoon DNREC CZA Review -

I am writing to present information concerning the Coastal Zone Act Permit determination for Starwood Ventures application. As a past member of the RAC workgroups which assisted in the development of the CZA Regulations, I am familiar with the provisions of the CZA and the balance of development consistent with economic venture and job creation while protecting the coastal zone environment.

The Starwood Ventures parcel off of Hamburg Rd is NOT one of the 14 parcels in Delaware grandfathered for Heavy Industry use under the CZA. It specifically is restricted under the original CZA and the 2019 Regulations under Section 6.0 of the Regs where permissible uses are listed. In addition, under 8.2.4 and 8.2.5, the impact of the site preparation and the effect of the project site will adversely impact the quality of the water resources, affect water supply and electric supply, while also generating noise, heat, vibration, electromagnetic interference and potentially obnoxious odors from multiple (516) diesel generators per 8.2.7, along with the 5,000 gallon diesel tank. The zoning for this site does not currently allow for Heavy Industry as the parcel is zoned Suburban according to NCC Land Use information.

The Starwood Ventures parcel off of Gov. Lea Road, would require a permit and review for allowance and would require Starwood to supply a verified and competent hazard mitigation, risk mitigation, and contingency plan to handle any inundation from coastal flood, inland flood, and impact from natural hazards per the CZA Regulations of 2019. This has not been developed at this moment per the public documents at this time. In addition, the owner would need to develop a mitigation plan for remediation of any contamination currently on this site, and provide financial assurance to the State for funds expended in the State and Federal efforts of cleanup for this parcel from the former Diamond Shamrock Corporation's and Standard Chlorine's use of this property and the neighboring parcels. The Gov. Lea Rd parcel is zoned for Heavy Industry, however, should require ample environmental analysis as any disturbances in this area could cause impact to the ground water supply after ground disturbances stir up previous chemical contaminations.

Thank you for your time in considering these comments towards the review of permit determination.

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