



STATE OF DELAWARE  
EXECUTIVE DEPARTMENT  
OFFICE OF  
STATE PLANNING COORDINATION

May 16, 2005

Mr. Joseph R. Dietrich, PE  
Vollmer Associates, LLP  
800 Delaware Avenue, Ste. 610  
Wilmington, DE 19801

RE: PLUS review – PLUS 2005-04-17; Chetty Property

Dear Mr. Dietrich:

Thank you for meeting with State agency planners on April 27, 2005 to discuss the proposed plans for the Chetty Property project to be located on Route 299 east of Catherine Street in Middletown. According to the information received, you are seeking site plan approval for 312 residential units and 851,460 sq. foot of commercial on 16.9 acres.

Please note that changes to the plan, other than those suggested in this letter, could result in additional comments from the State. Additionally, these comments reflect only issues that are the responsibility of the agencies represented at the meeting. The developers will also need to comply with any Federal, State and local regulations regarding this property. We also note that as The Town of Middletown is the governing authority over this land, the developers will need to comply with any and all regulations/restrictions set forth by the Middletown.

**Executive Summary**

The following section includes some site specific highlights from the agency comments found in this letter. This summary is provided for your convenience and reference. The full text of this letter represents the official state response to this project. *Our office notes that the applicants are responsible for reading and responding to this letter and all comments contained within it in their entirety.*

**State Strategies/Project Location**

This proposal is located in an Investment Level 1 area according to the Strategies for State Policies and Spending. State policies support development proposals in these areas.

### **Street Design and Transportation**

- DelDOT will require a traffic impact study (TIS) for the subject development. The developer is aware of this requirement and met with Department personnel to set the scope for that study on April 29, 2005. When it has been completed and reviewed DelDOT will comment directly to the Town regarding it. They would urge the City not to approve the plan for the project until they have the recommendations based on that study.
- The proposed main entrance is located between two entrances on the opposite side of Main Street. DelDOT has other concerns about this entrance, discussed in Comment 6 below, but if the entrance is to be built approximately in its proposed location, it will have to be aligned with one of those two entrances.
- The proposed signalized intersection is about 700 feet east of an existing signal at Catherine Street and about 800 feet west of New Street, which is a logical location for a future signal. At spacings of less than 1,000 feet it is difficult to maintain the flow of traffic through a signal system. Therefore DelDOT is unlikely to install a signal at the proposed location of the main entrance.
- DelDOT strongly recommends that the buildings be rearranged to place the proposed surface parking deeper inside the site, away from Main Street, and bring the retail buildings up closer to Main Street, in keeping with the streetscape west of Catherine Street.

### **Natural and Cultural Resources**

- Given the environmentally sensitive nature of this watershed, the Department believes that the applicant should devote more effort to the implementation of innovative efforts or BMPs to reduce the amount of impervious cover.

The following are a complete list of comments received by State agencies:

### **Office of State Planning Coordination – Contact: Herb Inden 577-5188**

This project represents a proposal to construct a mixed-use residential/commercial project on vacant land close to Middletown's downtown area. Mixed-use projects are a very important component of the Livable Delaware program and thus we are very supportive of this project. Such projects offer residents the most options with regard to transportation, recreation, and working which thus creates a more livable environment. Additionally, given this projects closeness to the center of town, it will hopefully foster

an opportunity for pedestrian and other linkages to and from downtown whereby this project can work with the downtown to foster a stronger, synergistic, business climate. In this regard we do concur with DelDOT's comments (#9) regarding the surface parking area. It would be good to see a more seamless transition from downtown to your project with a facade along 299 that blends more with the streetscape going into town

**State Historic Preservation Office (SHPO) – Contact: Alice Guerrant 739-5685**

Nothing is known within this parcel, though the southeastern corner is very close to a known historic house, Maple Grove (N-3906), now demolished. The parcel is across Main St. from two historic houses (N-3891 and N-4007), although the eastern house (N-4007) appears to have been demolished already. The parcel is very near the eastern boundary of the Middletown Historic District (N-425), which is listed in the National Register of Historic Places. It is substantially screened from the district however by an existing row of houses along the east side of Catherine St. There is only a low potential for archaeological sites of any period. This project will not affect any significant historic properties.

**Department of Transportation – Contact: Bill Brockenbrough 760-2109**

- 1) DelDOT will require a traffic impact study (TIS) for the subject development. The developer is aware of this requirement and met with Department personnel to set the scope for that study on April 29, 2005. When it has been completed and reviewed DelDOT will comment directly to the Town regarding it. They would urge the City not to approve the plan for the project until they have the recommendations based on that study.
- 2) The developer's site engineer should contact the Subdivision Manager for New Castle County, Mr. John Schneider, regarding our specific requirements for access on Main Street. Mr. Schneider may be reached at (302) 760-2263. Normally, when a TIS is needed, the site engineer has ample time to work on the site plan because these studies can take as much as a year, including review time. In this case, given Comments 4 through 8 below, we recommend that they contact Mr. Schneider soon.
- 3) The subject development should be coordinated with the streetscape improvements planned for Main Street between Catherine and Wood Streets this summer. Because the improvements are being funded through DelDOT's Transportation Enhancement program, the developer may contact the manager for that program, Mr. Jeff Niezgoda, for more information. Mr. Niezgoda may be reached at (302) 760-2178.
- 4) The proposed main entrance is located between two entrances on the opposite side of Main Street. DelDOT has other concerns about this entrance, discussed in

- Comment 6 below, but if the entrance is to be built approximately in its proposed location, it will have to be aligned with one of those two entrances.
- 5) The plan presented at the PLUS meeting shows right-turn only entrances proposed at each end of the site, but no median is proposed on Main Street at the west entrance and what appears to be only a painted median is proposed at the east entrance. If the site is designed approximately as presently proposed, DelDOT would require raised concrete medians at these entrances.
  - 6) The plan presented at PLUS proposed east and west entrances with radii that began beyond the property line. Normally DelDOT does not permit such a design because it affects existing or potential entrances on the adjacent property. In the case of the west entrance, this situation is acceptable because the adjoining property is a residential lot fronting on Catherine Street. DelDOT now understands that the developer will be combining their east entrance with that of the Middletown post office, which is adjacent.
  - 7) The proposed transitions in typical section along Main Street are quite short and may not be acceptable.
  - 8) The proposed signalized intersection is about 700 feet east of an existing signal at Catherine Street and about 800 feet west of New Street, which is a logical location for a future signal. At spacings of less than 1,000 feet it is difficult to maintain the flow of traffic through a signal system. Therefore DelDOT is unlikely to install a signal at the proposed location of the main entrance.

If a signal at the main entrance is essential to the subject development, one option might be to shift the entrance further west and move the existing signal from Catherine Street to serve this development. That signal was installed in part to serve the Silver Lake Elementary School, so the site would have to be redesigned to create a street through the site from Main Street to the school entrance on East Cochran Street and provide for a smooth flow of school traffic along it. If the developer wishes to pursue this idea, it will have to be examined in the TIS.

- 9) DelDOT strongly recommends that the buildings be rearranged to place the proposed surface parking deeper inside the site, away from Main Street, and bring the retail buildings up closer to Main Street, in keeping with the streetscape west of Catherine Street. Placing storefronts along the streetscape encourages walking, brings traffic to those businesses and is more consistent with a downtown environment.

One concept that has been used elsewhere and may have merit here is combining the parking, retail and residential uses in each building, placing the retail uses on the first floor, the parking above it and the residential uses on top. Doing so

brings the parking close to the homes and shops without using potential storefront or rooftop space for parking.

**The Department of Natural Resources and Environmental Control – Contact:  
Kevin Coyle 739-3091**

**Soils**

According to the soil survey update, Reybold-Sassafras complex was mapped in the immediate vicinity of the proposed construction. Reybold-Sassafras is well-drained upland soil that has few limitations for development.

**TMDLs**

With the adoption of Total Maximum Daily Loads (TMDLs) as a “nutrient-runoff-mitigation strategy” for reducing nutrients in the Inland Bays Watershed, reduction of nitrogen and phosphorus loading will be mandatory. A TMDL is the maximum level of pollution allowed for a given pollutant below which a “water quality limited water body” can assimilate and still meet water quality standards to the extent necessary to support use goals such as, swimming, fishing, drinking water and shell fish harvesting. Although TMDLs are authorized under federal code, states are charged with developing and implementing standards to support those desired use goals. The Jurisdictional authority for attaining these use goals will fall under the auspices of Section 11.5 of the State of Delaware’s Surface Water Quality Standards (as amended August 11, 1999), and will be achieved via nutrient reductions referred to as “pollution control strategies.”

Nutrient reductions prescribed under TMDLs are assigned to those watersheds or subwatersheds on the basis of recognized water quality impairments. In the Appoquinimink subwatershed, the primary source of water quality impairment is associated with nutrient runoff from agricultural and/or residential development. In order to mitigate the aforementioned impairments, a TMDL reduction level of 40 percent will be required for both nitrogen and phosphorus.

**In order for the applicant to verify compliance with the TMDL mandate, a full nutrient accounting process known as nutrient budget should be prepared. The developer/consultant should contact Lyle Jones (739-4590) in the Department’s Watershed Assessment Section for further information regarding the acceptable protocol for calculating a nutrient budget.**

The developer is encouraged to employ BMPs (or other pollution control strategies) such as stormwater management and riparian buffers to mitigate any potential nutrient runoff into an adjoining streams or watercourse.

In summary, the Watershed Assessment Section's Wetland/Soils Assessment Branch and the Wetlands and Subaqueous Lands Section believe that portions of this parcel could be developed; however, final approval is still contingent upon the satisfaction of all regulatory requirements including Federal TMDLs, Delaware's Surface Water Quality Standards, Federal/State wetland regulations, and appropriate pollution control strategies.

### **Impervious Cover**

Given the environmentally sensitive nature of this watershed, the Department believes that the applicant should devote more effort to the implementation of innovative efforts or BMPs to reduce the amount of impervious cover. Using pervious materials in lieu of impervious paving surfaces (asphalt or concrete), is a way that the applicant could significantly reduce the amount of pollutant-laden surface runoff ultimately draining to streams and/or waterbodies.

### **Water Supply**

Should dewatering points be needed during any phase of construction, a dewatering well construction permit must be obtained from the Water Supply Section prior to construction of the well points. In addition, a water allocation permit will be needed if the pumping rate will exceed 50,000 gallons per day at any time during operation.

All well permit applications must be prepared and signed by licensed water well contractors, and only licensed well drillers may construct the wells. Please factor in the necessary time for processing the well permit applications into the construction schedule. Dewatering well permit applications typically take approximately four weeks to process, which allows the necessary time for technical review and advertising.

Should you have any questions concerning these comments, please contact Rick Rios at 302-739-3665.

### **Water Resource Protection Areas**

A portion of the site falls within an excellent recharge area (see map). According to the State law that created the Source Water Protection Program, county and municipal governments will be required to enact ordinances to protect Water Resource Protection Areas. The following language has been excerpted from the Source Water Protection Guidance Manual for Local Governments, Supplement 1 - Ground-Water Recharge Design Methodology. While the local ordinances are not yet in place, the developer may find the language useful in modifying the site plan to protect the wellhead protection area.

Water Resource Protection Areas (WRPAs) are defined as (1) surface water areas such as floodplains, limestone aquifers, and reservoir watersheds, (2) wellhead areas, or (3) excellent recharge areas. The purpose of an impervious cover threshold is to minimize

loss of recharge and protect the quality and quantity of ground and surface water supplies in WRPA's.

New development in WRPA's may exceed the 20 % impervious cover threshold, but be no more than 50 % impervious, provided the applicant submits an environmental assessment report recommending a climatic water budget and facilities to augment recharge. The environmental assessment must document that post-development recharge will be no less than predevelopment recharge when computed on an annual basis.

Commonly, the applicant offsets the loss of recharge due to impervious cover by constructing recharge basins that convey relatively pure rooftop runoff for infiltration to ground water.

The Department recommends the following (ranked in order of preference):

- 1) Preserve WRPA's as open space and parks by acquisition or conservation easement.
- 2) Limit impervious cover of new development to 20 % by right within WRPA's.
- 3) Allow impervious cover of new development to exceed 20% within WRPA's (but no more than 50% impervious) provided the applicant develops recharge facilities that directly infiltrate rooftop runoff.
- 4) Allow impervious cover of new development to exceed 20% within WRPA's (but no more than 50% impervious) provided the applicant develops recharge facilities that infiltrate stormwater runoff from forested and/or grassed surfaces with pretreatment.

For more information, refer to:

[Source Water Protection Guidance Manual for the Local Governments of Delaware at   
http://www.wr.udel.edu/swaphome/phase2/Manual/SwappManual.pdf](http://www.wr.udel.edu/swaphome/phase2/Manual/SwappManual.pdf)

and

[Ground-Water Recharge Design Methodology at   
http://www.wr.udel.edu/swaphome/phase2/Manual/SwappManual\\_supplement\\_1.pdf](http://www.wr.udel.edu/swaphome/phase2/Manual/SwappManual_supplement_1.pdf)

### **Sediment and Erosion Control/Stormwater Management**

A detailed sediment and stormwater plan will be required prior to any land disturbing activity taking place on the site. The plan review and approval as well as construction inspection will be coordinated through the Town of Middletown, which has been delegated sediment and stormwater program implementation within the Town limits. Contact Morris Deputy at (302) 378-9120 for details regarding submittal requirements and fees.

A Notice of Intent (NOI) for Stormwater Discharges Associated with Construction Activity must be submitted to DNREC Division of Soil and Water Conservation along with the \$195 NOI fee prior to plan approval.

Each stormwater management facility should have an adequate outlet for release of stormwater. Any drainage conveyed onto this site from neighboring properties must be adequately conveyed through the site to the discharge point without interruption.

### **Recreation**

It is recommended that sidewalks be incorporated throughout this project. A complete system of sidewalks will: 1) fulfill the recreation need for walking and biking facilities, 2) provide opportunities for neighbors to interact in the community, and 3) facilitate safe, convenient off-road access to neighboring communities, parks, public mass transit stops, schools, stores, work, etc.

### **Underground Storage Tanks**

There are 4 inactive LUST sites located near the proposed project:

Redding Middle School (Facility 3-001107, Projects N0002025, N8705013, and N8705012)

Burge Inc. (Facility 3-000135, Project N9810181)

Shore Stop #277 (Facility 3-000277, Project N9805077)

Stanley Property (Facility 3-002033, Project N9910208)

There is 1 active LUST site located near the proposed project:

Former Smokey's Gulf (Facility 3-000319, Project N9205143)

No environmental impact is expected from the above inactive/active LUST sites. However, should any underground storage tank or petroleum contaminated soil be discovered during construction, the Tank Management Branch must be notified as soon as possible. It is not anticipated that any construction specifications would be need to be changed due to petroleum contamination. Should any unanticipated contamination be encountered and PVC pipe is being utilized, it will need to be changed to ductile steel in the contaminated areas.

### **Solid Waste**

Each Delaware household generates approximately 3,600 pounds of solid waste per year. On average each new house constructed generates an additional 10,000 pounds of construction waste. Due to Delaware's present rate of growth and the impact that growth will have on the state's existing landfill capacity, the applicant is requested to estimate the amount of solid waste that will be generated as a result of construction and occupancy.

## Air Quality

Air pollution threatens the health of human beings and other living things on our planet. While often invisible, pollutants in the air create smog and acid rain, cause cancer or other serious health effects, diminish the protective ozone layer in the upper atmosphere, and contribute to the potential for world climate change. Breathing polluted air can have numerous effects on human health, including respiratory problems, hospitalization for heart or lung disease, and even premature death. Some can also have effects on aquatic life, vegetation, and animals.

The Department of Natural Resources and Environmental Control is asking that local jurisdictions consider mitigation to help resolve this issue. Mitigation might involve limiting large new developments to growth zones, focusing development to urban areas capable of providing mass transit services, requiring more energy efficient homes which would lessen air quality impacts, and promoting walkability and bikability within and between developments and town centers.

Once complete, vehicle emissions associated with this project are estimated be 23.9 tons (47,888.7 pounds) per year of VOC (volatile organic compounds), 19.8 tons (39,648.6 pounds) per year of NO<sub>x</sub> (nitrogen oxides), 14.6 tons (29,253.5 pounds) per year of SO<sub>2</sub> (sulfur dioxide), 1.3 ton (2,604.1 pounds) per year of fine particulates and 2,002.9 tons (4,005,832.4 pounds) per year of CO<sub>2</sub> (carbon dioxide).

Emissions from area sources associated with this project are estimated be 9.7 tons (19,315.7 pounds) per year of VOC (volatile organic compounds), 1.1 ton (2,125.3 pounds) per year of NO<sub>x</sub> (nitrogen oxides), 0.9 ton (1,763.7 pounds) per year of SO<sub>2</sub> (sulfur dioxide), 1.1 ton (2,276.0 pounds) per year of fine particulates and 39.2 tons (78,301.6 pounds) per year of CO<sub>2</sub> (carbon dioxide).

Emissions from electrical power generation associated with this project are estimated to be 3.8 tons (7,655.4 pounds) per year of NO<sub>x</sub> (nitrogen oxides), 13.3 tons (26,627.3 pounds) per year of SO<sub>2</sub> (sulfur dioxide) and 1,963.8 tons (3,927,530.9 pounds) per year of CO<sub>2</sub> (carbon dioxide).

	VOC	NO <sub>x</sub>	SO <sub>2</sub>	PM <sub>2.5</sub>	CO <sub>2</sub>
Mobile	23.9	19.8	14.6	1.3	2002.9
Residential	9.7	1.1	0.9	1.1	39.2
Electrical Power		3.8	13.3		1963.8
TOTAL	33.6	24.7	28.8	2.4	4005.9

For this project the electrical usage via electric power plant generation alone totaled to produce an additional 3.8 tons of nitrogen oxides per year and 13.3 tons of sulfur dioxide per year.

A significant method to mitigate this impact would be to require the builder to construct Energy Star qualified homes. Every percentage of increased energy efficiency translates into a percent reduction in pollution. Quoting from their webpage <http://www.energystar.gov/>:

“ENERGY STAR qualified homes are independently verified to be at least 30% more energy efficient than homes built to the 1993 national Model Energy Code or 15% more efficient than state energy code, whichever is more rigorous. These savings are based on heating, cooling, and hot water energy use and are typically achieved through a combination of:

building envelope upgrades,  
high performance windows,  
controlled air infiltration,  
upgraded heating and air conditioning systems,  
tight duct systems and  
upgraded water-heating equipment.”

The DNREC Energy office is in the process of training builders in making their structures more energy efficient. The Energy Star Program is excellent way to save on energy costs and reduce air pollution. We highly recommend this project development and other residential proposals increase the energy efficiency of their homes.

**State Fire Marshal’s Office – Contact: John Rossiter 302-323-5365**

These comments are intended for informational use only and do not constitute any type of approval from the Delaware State Fire Marshal’s Office. At the time of formal submittal, the applicant shall provide; completed application, fee, and three sets of plans depicting the following in accordance with the Delaware State Fire Prevention Regulation (DSFPR):

a. **Fire Protection Water Requirements:**

- Water distribution system capable of delivering at least 1500 gpm for 2-hour duration, at 20-psi residual pressure is required. Fire hydrants with 800 feet spacing on centers. (Mercantile and Storage)
- Water distribution system capable of delivering at least 1000 gpm for 1-hour duration, at 20-psi residual pressure is required. Fire hydrants with 800 feet spacing on centers. (Assembly)
- Where a water distribution system is proposed for the site, the infrastructure for fire protection water shall be provided, including the size of water mains for fire hydrants and sprinkler systems.

b. **Fire Protection Features:**

- All structures over 10,000 Sq. Ft. aggregate will require automatic sprinkler protection installed.

- Buildings greater than 10,000 sq.ft., 3-stories or more or over 35 feet, or classified as High Hazard, are required to meet fire lane marking requirements.
- Show Fire Department Connection location (Must be within 300 feet of fire hydrant), and detail as shown in the DSFPR.
- Show Fire Lanes and Sign Detail as shown in DSFPR

c. **Accessibility**

- All premises which the fire department may be called upon to protect in case of fire, and which are not readily accessible from public roads, shall be provided with suitable gates and access roads, and fire lanes so that all buildings on the premises are accessible to fire apparatus. This means that the access road to the subdivision from East Main Street must be constructed so fire department apparatus may negotiate it.
- Fire department access shall be provided in such a manner so that fire apparatus will be able to locate within 100 ft. of the front door.
- Any dead end road more than 300 feet in length shall be provided with a turn-around or cul-de-sac arranged such that fire apparatus will be able to turn around by making not more than one backing maneuver. The minimum paved radius of the cul-de-sac shall be 38 feet. The dimensions of the cul-de-sac or turn-around shall be shown on the final plans. Also, please be advised that parking is prohibited in the cul-de-sac or turn around.
- The use of speed bumps or other methods of traffic speed reduction must be in accordance with Department of Transportation requirements.
- The local Fire Chief, prior to any submission to our Agency, shall approve in writing the use of gates that limit fire department access into and out of the development or property.

d. **Gas Piping and System Information:**

- Provide type of fuel proposed, and show locations of bulk containers on plan.

e. **Required Notes:**

- Provide a note on the final plans submitted for review to read “ All fire lanes, fire hydrants, and fire department connections shall be marked in accordance with the Delaware State Fire Prevention Regulations”
- Proposed Use
- Alpha or Numerical Labels for each building/unit for sites with multiple buildings/units
- Square footage of each structure (Total of all Floors)
- National Fire Protection Association (NFPA) Construction Type
- Maximum Height of Buildings (including number of stories)
- Note indicating if building is to be sprinklered
- Name of Water Provider

- Letter from Water Provider approving the system layout
- Provide Lock Box Note (as detailed in DSFPR) if Building is to be sprinklered
- Provide Road Names, even for County Roads

Preliminary meetings with fire protection specialists are encouraged prior to formal submittal. Please call for appointment. Applications and brochures can be downloaded from our website: [www.delawarestatefiremarshal.com](http://www.delawarestatefiremarshal.com), technical services link, plan review, applications or brochures.

**Department of Agriculture - Contact: Mark Davis 739-4811**

The Delaware Forest Service has no objections to this site at this time; however, the Delaware Forest Service encourages the developer to contact them if they have any questions concerning tree plantings and/or tree care.

**Right Tree for the Right Place**

The Delaware Department of Agriculture encourages the developer to use the “Right Tree for the Right Place” for any design considerations. This concept allows for the proper placement of trees to increase property values in upwards of 25% of appraised value and will reduce heating and cooling costs on average by 20 to 35 dollars per month. In addition, a landscape design that encompasses this approach will avoid future maintenance cost to the property owner and ensure a lasting forest resource.

**Public Service Commission - Contact: Andrea Maucher 739-4247**

Project is within the Town of Middletown’s certificated water service territory.

Any expansion of natural gas or installation of a closed propane system must fall within Pipeline Safety guidelines. Contact: Malak Michael at (302) 739-4247.

If the project connects to public wastewater services from the City, and the project lies outside of the service territory established in October 2004, then the City must update the information it filed with the Commission.

**Delaware State Housing Authority – Contact Karen Horton 739-4263**

While the prices of the units are not known at this time, we encourage the applicant to include prices that are affordable to low- and moderate-income households. This proposal is in the Middletown/Odessa County Census Division (CCD), which has significant housing needs. The 2003 Statewide Housing Needs Assessment indicates that of the 9,549 occupied housing units in this CCD, 112 are substantially substandard, and 2,744 are occupied by low-income households earning less than 80 percent of the area median income (\$58,000 for a family of four in New Castle County). In addition, this

area is experiencing rapid price increases. Real estate data collected by DSHA indicates that in the fourth quarter of 2004, the median housing price for this CCD was \$241,500 - which is outside the affordability level of low- and moderate-income households. The provision of units affordable to low- and moderate-income households will help address the area's housing needs.

**Delaware Emergency Management Agency – Contact: Don Knox 659-3362**

Due to the large number of residential units and commercial development being proposed, a significant impact to public safety is foreseen by implementation of this project. The developer should notify the police, fire service, and emergency medical response organization serving the Town of Middletown, to keep them apprised of all development activities. Routes 13, 71, and 299 are coastal storm evacuation routes and this development will be affected by traffic volume on these routes during a coastal storm event.

**Department of Education – Contact: Nick Vacirca 739-4658**

312 dwelling units could generate an estimated 156 additional students for the Appoquinimink School District. New Castle County and all incorporated municipalities within the County have school concurrence legislation at this time. Prior to Major Record Plan approval the developer will have to show proof of adequate school capacity or proof of a voluntary assessment agreement. Additional information in reference to school capacity legislation can be obtained from the Department of Education. Please contact Nicholas Vacirca @ 302-739-4658.

If the development is approved and built, please use the following information for school transportation planning. If there are homes more than 1/2 mile from the nearest public road (outside the development), developers should plan wide enough streets so that large school buses can access and turn around (without backing) from the furthest areas within the development while picking up and dropping off students. Should there not be any sites more than 1/2 mile from the nearest public road, provisions for appropriate pick-up and drop-off at the development entrance should be included. The developer should work closely with the school district transportation supervisor.

**Following receipt of this letter and upon filing of an application with the local jurisdiction, the applicant shall provide to the local jurisdiction and the Office of State Planning Coordination a written response to comments received as a result of the pre-application process, noting whether comments were incorporated into the project design or not and the reason therefore.**

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Thank you for the opportunity to review this project. If you have any questions, please contact me at 302-739-3090.

Sincerely,

A handwritten signature in cursive script that reads "Constance C. Holland". The signature is written in black ink and is positioned above the printed name and title.

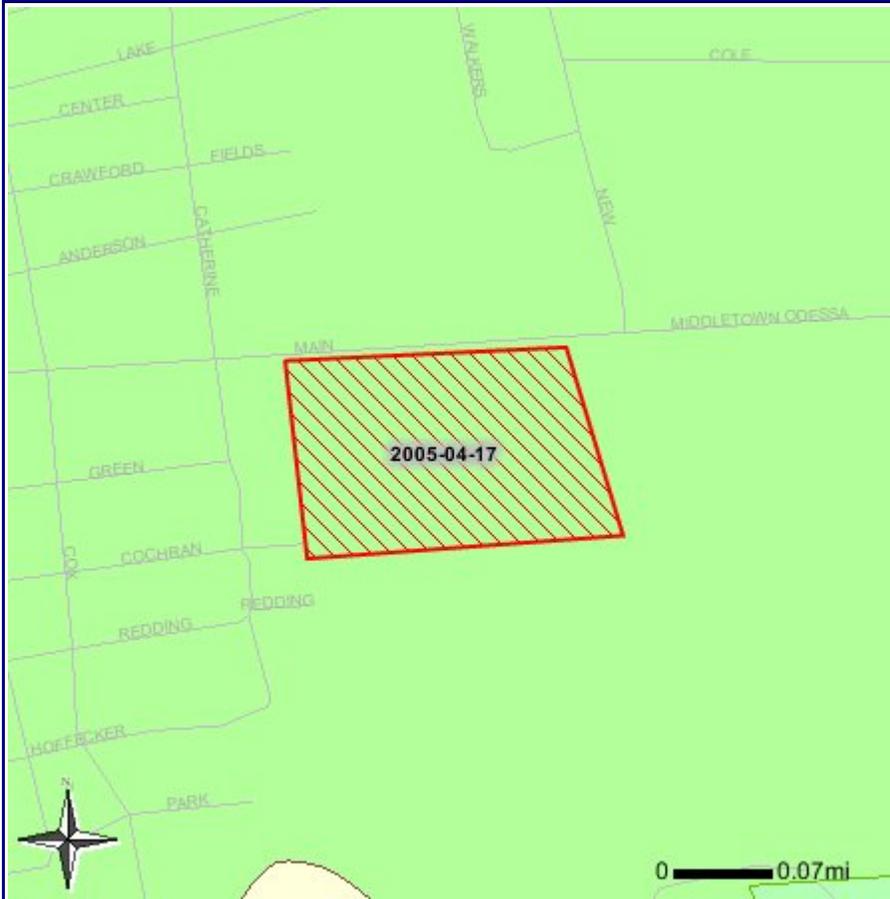
Constance C. Holland, AICP  
Director

CC: Town of Middletown



# Chetty Property

2005-04-17



- PLUS Projects
- NHDFlowLine
- All Roads
- Excellent Recharge Areas
- Towns

This map was produced by the Delaware Department of Natural Resources and Environmental Control.

