



STATE OF DELAWARE
EXECUTIVE DEPARTMENT
OFFICE OF
STATE PLANNING COORDINATION

August 16, 2005

Mr. Randy Duplechain
Davis, Bowen & Friedel, Inc.
23 North Walnut Street
Milford, DE 19963

RE: PLUS 2005-07-08, Lands of Vale Asche

Dear Mr. Duplechain,

Thank you for meeting with State agency planners on July 27, 2005 to discuss the proposed plans for the Vale Asche project to be located on 146.40 acres on Route 113 in the City of Milford. According to the information received, you are seeking to construct 567 dwelling units, a 160,000 square foot shopping center, and seven other commercial uses.

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 City of Milford is the governing authority over this land, the developers will need to comply with any and all regulations/restrictions set forth by the City.

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 project is located in the City of Milford and contains a mixture of residential and commercial land uses. The State supports mixed use projects in municipalities as essential to the Livable Delaware strategy of concentrating growth in and around existing communities and infrastructure.

Street Design and Transportation

Due to the ongoing Route 113 North – South Study and other issues related to Route 113, some of the access points shown on the plan may not be permitted as indicated. The developer should contact DelDOT for more information.

DelDOT supports the “service road” shown on the plans, and requests that the developers evaluate ways to make the northern terminus a conventional four way intersection.

Natural and Cultural Resources

The subdivision plan proposes significant forest clearing on the southern portion of the site. The developer is encouraged to revise the plan to preserve and enhance the forest resources on the site to the greatest extent possible. Clearing forests to install stormwater management areas is counterproductive.

Office of State Planning Coordination – Contact David Edgell 739-3090

This project is located in Investment Levels 1, 2 and 3 according to *Strategies for State Policies and Spending*. This site is also located in the City of Milford. Investment Levels 1 and 2 reflect areas that are already developed in an urban or suburban fashion, where infrastructure is existing or readily available, and where future redevelopment or infill projects are expected and encouraged by State policy. Investment Level 3 generally indicate areas where growth is expected in the longer term future, or areas in designated growth zones that contain environmental resources. In this case, the Level 3 area indicates that growth was expected in the future, but since the *Strategies* were completed this parcel has been annexed into Milford.

This project is a mixed use project providing residential and commercial land uses. **Our office supports mixed use projects in municipalities as essential to the Livable Delaware strategy of concentrating growth in and around existing communities and infrastructure.** This is the type of project that is highly desirable to allow us to meet our goals of revitalizing our already urbanized areas while protecting agricultural lands and natural resource areas from encroachment by sprawling suburban and rural development. Our office has no objections to the proposed development of this project in accordance with the relevant City codes and ordinances.

Division of Historic and Cultural Affairs – Contact Alice Guerrant 739-5685

Nothing is known on this parcel. There are a number of 19th- and 20th-century houses along Shawnee Rd. and Rt. 113 that do appear in the SHPO inventory. The developer should provide landscaping to block the view, light, and noise of this development from these historic houses, especially those on Shawnee Rd. that will be adjacent to the commercial development.

There are areas of high potential for prehistoric-period archaeological sites, and Beers Atlas of 1868 shows the G.W. Orem House in the northern part of the parcel. There may be archaeological remains associated with that property still intact. SHPO would appreciate the opportunity to check for archaeological sites and perhaps to conduct testing to discover something about their location and character before any ground-disturbing activities take place.

Department of Transportation – Contact Bill Brockenbrough 760-2109

Bruce S. Geyer seeks to develop 567 dwelling units (279 single-family detached houses, 144 townhouses and 144 apartments), a 160,000 square foot shopping center and seven commercial outparcels on a 146.4-acre parcel (Tax Parcel 1-30-3.00-261.00). The subject land is located on the west side of US Route 113, extending south from Seabury Avenue Extended (Sussex Road 36A). The land is zoned C-3 (34.3 acres) and R-3 (111.7 acres) in the City of Milford and it would be developed by right.

- 1) Regarding off-site improvements, a traffic impact study (TIS) is in progress. The scope of work for that study was established at a meeting on June 1, 2005. Typically such studies take about one year to be completed and reviewed. The City should not act on the plans for the proposed development without the results of that study.
- 2) DelDOT's US 113 North-South Study is presently evaluating alternative alignments for a limited access highway between Milford and the Maryland line at Selbyville. In the Milford area, there are multiple alignments under consideration. A determination on the alternatives to be retained for detailed analysis is expected this summer. One of the alternatives is improving the existing road, which would mean converting the existing northbound lanes into a service road, using the existing southbound lanes as northbound lanes, and building new southbound lanes. If this alternative were selected, the proposed main access on Route 113 would be limited to right turns only and a strip of right-of-way would be needed from the property frontage. For more information on the US 113 North-South Study, the developer or the City may contact Mr. Monroe Hite at (302)760-2120.
- 3) Apart from the US 113 North-South Study, DelDOT is working to manage access in the Route 113 corridor to maintain the capacity of the existing road.

Accordingly, all of the proposed access may not be permitted there. The developer's site engineer should contact the Subdivision Manager for Sussex County, Mr. John Fiori, in this regard. Mr. Fiori may be reached at (302) 760-2260.

- 4) A prominent feature of the plan is a road parallel to Route 113 that would function as a service road, although it is not listed as such. DelDOT understands that this road is included in the City's Comprehensive Plan, views it as a desirable feature, and offers three comments regarding specific aspects of it:
 - a) If possible, the north end should be aligned to create a four-way intersection with Seabury Avenue Extended, Lakeview Avenue Extended (Sussex Road 36) and Shawnee Road (also Sussex Road 36). From aerial photography, the land needed for this alignment is wooded and may be wet, but operationally the four-way intersection would be preferable to the proposed access.
 - b) There is a cluster of six existing parcels, fronting on Route 113, which the service road would run behind. The service road right-of-way should be placed adjacent to the rear property lines of those properties, so that when they are redeveloped their access can be by way of the service road.
 - c) The street layout in the residential section should be changed to allow for the future extension of the service roads further south and the lots fronting on it should be repositioned to front on other streets.
- 5) One or more stub streets should be provided to the adjoining large parcel that fronts on Calhoun Road (Sussex Road 621).
- 6) The plan shows what appear to be a series of storm water ponds along the Route 113 site frontage. Normally, such ponds would be acceptable if the developer provides a 20-foot minimum buffer between the ultimate right-of-way and the top of slopes of the ponds and the runoff from the site is managed such that the rate and volume of the post-development runoff would not exceed the rate and volume of the pre-development runoff. However, because DelDOT may be widening the road, the ponds are likely to be unacceptable even under those conditions. They should be moved away from Route 113 and incorporated internally as part of the site design. Mr. Fiori will make a final determination in this matter when reviewing the detailed plans for the site.
- 7) DART First State presently provides transit service along Route 113 in front of this site by means of Route 303 (Dover-Georgetown). The developer should be required to provide for pedestrian access along Route 113 and into the site from there. More information concerning Route 303 and the desired access is available from Mr. Wayne Henderson, a Service Development Planner for the Delaware Transit Corporation. Mr. Henderson may be reached at (302)577-3278, extension 3553.

The Department of Natural Resources and Environmental Control
Contact Kevin Coyle 739-9071

Impervious Cover

Since residential development significantly increases the amount of impervious cover - leading to large volumes of contaminant-laden runoff which ultimately drain into streams or waterways - the applicant is strongly urged to pursue both natural and constructed Best Management Practices (BMPs) to reduce such impacts. Reducing the amount of impervious surfaces via tree planting, and the use of pervious paving surfaces (“pavers”) in lieu of asphalt or concrete - are examples of BMPs that help reduce such impacts. Research has consistently shown that once a watershed exceeds a threshold of 10 percent imperviousness, water and habitat quality irreversibly decline.

TMDLs

A Total Maximum Daily Load (TMDL) is the maximum level of pollution for which a water quality limited water body can assimilate without compromising use and recreational goals such as swimming, fishing, drinking water, and shell fish harvesting. Although TMDLs as a “pollution runoff mitigation strategy” to reduce nutrient loading have not yet been developed for the Mispillion River subwatershed to date, work is continuing on their development and they should be completed by December 2006.

Therefore, until the specified TMDL reductions and pollution control strategies are adopted, it shall be incumbent upon the developer to employ best available technologies (BATS) and/or best management practices (BMPs) as “methodological mitigative strategies” to reduce degradative impacts that might be associated with this proposed project. Reducing imperviousness and planting/preservation of trees are some examples of proactive mitigative strategies that will help reduce impacts on water quality from excessive nutrient runoff, while ensuring State compliance with imminent Federal TMDL regulatory requirements.

Water Supply

The information provided indicates that the Town of Milford will provide water to the proposed projects through a central public water system. Milford does not currently hold a certificate of public convenience and necessity (CPCN) to provide public water in these areas. They will need to file an application for a CPCN with the Public Service Commission, if they have not done so already. Information on CPCN requirements and applications can be obtained by contacting the Public Service Commission at (302)739-4247.

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. Contact Rick Rios at (302)739-9944.

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 Sussex Conservation District. Contact Jessica Watson at (302)856-7219 for details regarding submittal requirements and fees. As of April 11, 2005, stormwater best management practices must also consider water quality as well as quantity in impaired water bodies.

Drainage

The Drainage Section requests all existing ditches on the property be checked for function and cleaned if needed prior to the construction of homes. Wetland permits may be required before cleaning ditches. The Drainage Section requests that all precautions be taken to ensure the project does not hinder any off site drainage upstream of the project or create any off site drainage problems downstream by the release of on site storm water. The Drainage Section strongly recommends any drainage conveyance between two parcels within a subdivision be dedicated as a drainage easement and such easement be designated as passive open space, not owned by individual landowners. The easement should be of sufficient width to allow for future drainage maintenance as described below.

Along an open ditch or swale, the Drainage Section recommends a maintenance equipment zone of 25 feet measured from the top of bank on the maintenance side, and a 10-foot setback zone measured from top of bank on the non-maintenance side. These zones should be maintained as buffers to aid in the reduction of sediment and nutrients entering into the drainage conveyance. Grasses, forbs and sedges planted within these zones should be native species, selected for their height, ease of maintenance, erosion control, and nutrient uptake capabilities. Trees and shrubs planted within the maintenance zone should be native species spaced to allow for drainage maintenance at maturity. Trees should not be planted within 5 feet of the top of ditch to avoid future blockages from roots.

Along a stormwater pipe the Drainage Section recommends a maintenance equipment zone of 15 feet on each side of the pipe as measured from the pipe centerline. This zone should be maintained as buffers to aid in the reduction of sediment and nutrients entering

into the drainage conveyance. Grasses, forbs and sedges planted within these zones should be native species selected for their height, ease of maintenance, erosion control, and nutrient uptake capabilities. Trees and shrubs planted within the maintenance zone should be spaced to allow for drainage maintenance at maturity.

The Drainage Section recommends any drainage/utility easement owned by an individual landowner should not have structures, decks, buildings, sheds, kennels, fences or trees within the drainage easement to allow for future drainage maintenance.

Forests

Significant forest clearing is proposed in the southern portion of the project area. The developer is strongly encouraged to remove all lots and infrastructure (e.g. stormwater management ponds) from these areas. Large forest blocks such as those on-site provide habitat for other wildlife and provide important water quality benefits. Impacts to this forest will result in a significant decrease in habitat value. Therefore, the developer is strongly encouraged to preserve, and where possible, enhance forested resources on site. Any lands set aside for conservation purposes should be placed into a permanent conservation easement or other binding protection mechanism. These areas should be clearly marked and delineated so that residents understand their importance and so that homeowner activities do not infringe upon these areas.

Open Space

To maximize the existing buffering capacity and wildlife habitat on site, it is recommended that lot lines and other infrastructure (such as stormwater management ponds) be pulled out of the forest and areas of community open space be designated along the forested areas. Doing so will preserve its value for birds and wildlife and it will create recreational opportunities for residents by allowing them access to and views of the forest. Open space containing forest and/or wetlands should be placed into a permanent conservation easement or other permanent protection mechanism. Conservation areas should also be demarked to avoid infringement by homeowners.

Nuisance Waterfowl

Stormwater management ponds that remain in the site plan may attract waterfowl like resident Canada geese and mute swans. High concentrations of waterfowl in ponds create water-quality problems, leave droppings on lawn and paved areas and can become aggressive during the nesting season. Short manicured lawns around ponds provide an attractive habitat for these species. Native plantings of tall grasses, wildflowers, shrubs, and trees at the edge and within a buffer area (50 feet) around the perimeter are recommended. Waterfowl do not feel safe when they can not see the surrounding area for possible predators. These plantings should be completed as soon as possible as it is easier to deter geese when there are only a few than it is to remove them once they become plentiful. The Division of Fish and Wildlife does not provide goose control services, and

if problems arise, residents or the home-owners association will have to accept the burden of dealing with these species (e.g., permit applications, costs, securing services of certified wildlife professionals). Solutions can be costly and labor intensive; however, with proper landscaping, monitoring, and other techniques, geese problems can be minimized.

Underground Storage Tanks

There are two inactive LUST site(s) located near the proposed project:

Shawnee Woods Farms, Facility # 5-000485, Project # S9904067

Allen's Market, Facility # 5-000804, Project # S9501026

No environmental impact is expected from the above inactive/active LUST site(s). 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. However, 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 be aware of the impact this project will have on the State's limited landfill resources and, to the extent possible, take steps to minimize the amount of construction waste associated with this development.

Solid Waste Transfer Station

The Delaware Solid Waste Authority (DSWA) is currently constructing the DSWA Milford Transfer Station on an 11 acre parcel (tax parcel# 1-30-6-99), to the south of the Lands of Ashe and PNC Bank of Delaware project area (tax parcel 1-30-3-261). There is one property in between the Lands of Ashe and PNC Bank of Delaware project and the DSWA Milford Transfer Station. That property, tax parcel 1-30-6-98, is owned by Dr. C.E. Graybeal. The DSWA Milford Transfer Station is permitted to accept and process up to 350 tons of solid waste per day for transfer and disposal to an approved facility. Traffic into and out of the transfer station will use Route 113. The DSWA indicated in their application that up to 180 vehicles per day will utilize the transfer station when it is operating at its maximum permitted capacity of 350 tons per day. Solid waste transfer station permit SW-04/03 was issued on May 13, 2004. The transfer station construction is currently due to be completed in the fall of 2005. Should you have any questions concerning these comments, contact Avery Dalton at (302)739-9403. If there are any questions concerning the DSWA Milford Transfer Station construction, contact the

Delaware Solid Waste Authority project officer, Tom Heck at (302)739-5361.

Air Quality

Once complete, vehicle emissions associated with this project are estimated to be 43.5 tons (87,028.6 pounds) per year of VOC (volatile organic compounds), 36.0 tons (72,053.8 pounds) per year of NOx (nitrogen oxides), 26.6 tons (53,162.6 pounds) per year of SO₂ (sulfur dioxide), 2.4 ton (4,732.4 pounds) per year of fine particulates and 3,639.9 tons (7,279,830.1 pounds) per year of CO₂ (carbon dioxide).

Emissions from area sources associated with this project are estimated to be 17.6 tons (35,102.6 pounds) per year of VOC (volatile organic compounds), 1.9 ton (3,862.3 pounds) per year of NOx (nitrogen oxides), 1.6 ton (3,205.2 pounds) per year of SO₂ (sulfur dioxide), 2.1 ton (4,136.2 pounds) per year of fine particulates and 71.1 tons (142,298.0 pounds) per year of CO₂ (carbon dioxide).

Emissions from electrical power generation associated with this project are estimated to be 7.0 tons (13,912.1 pounds) per year of NOx (nitrogen oxides), 24.2 tons (48,390.0 pounds) per year of SO₂ (sulfur dioxide) and 3,568.8 tons (7,137,532.1 pounds) per year of CO₂ (carbon dioxide).

	VOC	NOx	SO ₂	PM _{2.5}	CO ₂
Mobile	43.5	36.0	26.6	2.4	3639.9
Residential	17.6	1.9	1.6	2.1	71.1
Electrical Power		7.0	24.2		3568.8
TOTAL	61.1	44.9	52.4	4.5	7279.8

For this project the electrical usage via electric power plant generation alone totaled to produce an additional 7.0 tons of nitrogen oxides per year and 24.2 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 energy office in DNREC 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. DNREC highly recommends that this project and other residential proposals increase the energy efficiency of their homes.

State Fire Marshal’s Office – Contact Duane Fox 856-5298

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):

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)
- 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 and Townhouses)
- Where a water distribution system is proposed for single family dwellings it shall be capable of delivering at least 500 gpm for 1-hour duration, at 20-psi residual pressure. Fire hydrants with 1000 feet spacing on centers are required. (One & Two- Family Dwelling)
- 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.

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
- For townhouse buildings, provide a section / detail and the UL design number of the 2-hour fire rated separation wall on the Site plan.
- Try to provide a fire hydrant on the backside of the Milford Grain site for the 30,000-gal LPG tank.

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 N. DuPont Boulevard 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. 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.

Gas Piping and System Information

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

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)
- Townhouse 2-hr separation wall details shall be shown on site plans
- 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 www.delawarestatefiremarshal.com.

Department of Agriculture - Contact Milton Melendez 698-4500

The Delaware Department of Agriculture has no objections to the Lands of Vale Ashe & PNC Bank application. The site is located within a designated controlled development area which is supportive of the *Strategies for State Policies and Spending* encouraging responsible development in the Level 2 area; the Delaware Department of Agriculture supports growth in these areas.

Improved Landscape Design

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.

Native Landscapes

The Delaware Department of Agriculture encourages the developer to use native trees and shrubs to buffer the property from the adjacent land-use activities near this site. A properly designed forested buffer can create wildlife habitat corridors and improve air quality to the area by removing six to eight tons of carbon dioxide annually and will clean rivers and creeks of storm-water run-off pollutants. To learn more about acceptable native trees and how to avoid plants considered invasive to local landscapes, contact the Delaware Department of Agriculture Plant Industry Section at (302)698-4500.

Public Service Commission - Contact Andrea Maucher 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. Any expansion of natural gas or installation of a closed propane system must fall within Pipeline Safety guidelines.

Delaware State Housing Authority – Contact Jimmy Atkins 739-4263

This proposal is to develop 567 residential units and 160,000 sq. ft. of commercial space on 146 acres on the west side of US 113, South of State Route 36 in the City of Milford. According to the *Strategies for State Policies and Spending*, the proposal is located in Levels 1 and 2, and inside the growth zone. As a general planning practice, DSHA encourages residential development in these areas where residents will have proximity to

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services, markets, and employment opportunities. The proposal targets units for first time homebuyers, which will help to create affordable housing opportunities for low- and moderate-income families.

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.

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".

Constance C. Holland, AICP
Director

CC: City of Milford