



STATE OF DELAWARE
EXECUTIVE DEPARTMENT
OFFICE OF MANAGEMENT AND BUDGET
STATE PLANNING COORDINATION

April 21, 2008

Roger Brickley
Clifton L. Bakhsh, Jr., Inc.
4450 Summit Bridge Road
Middletown, DE 19709

RE: PLUS review – 2008-03-03; Bloom Manufacturing Subdivision

Dear Mr. Brickley:

Thank you for meeting with State agency planners on March 26, 2008 to discuss the proposed plans for the Bloom Manufacturing Subdivision project to be located on the south side of Lafferty Lane within the City of Dover.

According to the information received, you are seeking site plan approval through the City of Dover for a 29 lot manufacturing zoned subdivision.

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 Dover 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 Investment Level 3 according to the Strategies for State Policies and Spending. This site is also located in the City of Dover Investment Level 3 reflects

areas where growth is anticipated by local, county, and state plans in the longer term future, or areas that may have environmental or other constraints to development. State investments will support growth in these areas, but please be advised that the State may have other priorities in the near term future. We encourage you to design the site with respect for the environmental features which are present.

Street Design and Transportation

- The proposed development would warrant a traffic impact study under DelDOT's newly adopted Standards and Regulations for Subdivision Streets and State Highway Access.
- Dover Land Enterprises, LLC proposes to develop contractor rental space on a parcel immediately west of the subject land. Their plan shows a stub street that appears to be slightly out of alignment with the one shown for the subject land. DelDOT supports the proposed interconnections in concept, but they must be coordinated.
- DelDOT recommends that the sidewalks proposed on Lafferty Lane be extended along the internal streets in the development. All of the sidewalks should be five feet wide.

Natural and Cultural Resources

- Approximately 60-70% of the soils mapped on subject parcel were mapped as Othello, Fallsington, and Carmichael; these soils have high potential to increase the intensity, duration, and frequency of future flooding events (both onsite and offsite) should they be filled, graded, or further disturbed. It is strongly recommended that such soils be avoided.
- According to the Statewide Wetland Mapping Project (SWMP) mapping, palustrine forested and palustrine farmed wetlands were mapped over much of this parcel. The mapped occurrence of the wetlands closely mirrors the mapped occurrence of the hydric soils. The Watershed Assessment Section recommends that the applicant maintain/establish a minimum 100-foot upland buffer (planted in native vegetation) from the landward edge of all wetlands and water bodies (including all ditches).
- Because of the parcel's location in an impaired watershed and the amount of impervious surface, green technology BMPs and low impact development practices should be considered a priority to reduce stormwater flow and to meet water quality goals.
- The Drainage Program is aware of existing drainage concerns on Morgan Branch downstream of this area. Please contact the Sediment & Stormwater Program of the Kent Conservation District to discuss the probability of a downstream analysis

for this project. The Drainage Program requests that the engineer take precautions 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 Program requests that the engineer check existing downstream conditions for function and blockages prior to the construction. Notify downstream landowners of the change in volume of water released on them.

- A portion of this parcel contains forested wetlands which can support an array of plant and animal species. These forested wetlands occur specifically in the area of the parcel designated as 'Phase II'. Cumulative impacts are a concern as there are two other projects in the immediate area: Mitten Industrial Park and Dover Land Enterprises. It is highly recommended that Phase II be designed with consideration for the environmental resources of this site and work within those constraints rather than fragmenting the forested area and degrading the wetlands. Forested wetlands should be protected, not developed.

This office has received the following comments from State agencies:

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

This project is located in Investment Level 3 according to the Strategies for State Policies and Spending. This site is also located in the City of Dover Investment Level 3 reflects areas where growth is anticipated by local, county, and state plans in the longer term future, or areas that may have environmental or other constraints to development. State investments will support growth in these areas, but please be advised that the State may have other priorities in the near term future. We encourage you to design the site with respect for the environmental features which are present.

State Historic Preservation Office (SHPO) – Contact: Terrence Burns 739-5685

Development projects, whether they are big or small and whether they are located in rural areas or urban areas, have the capability to impact or affect Historic and Cultural Resources. "Historic and Cultural Resources can be either an archaeological resource or site, or a national register property or site, which listed on the National Register of Historic Places of the National Park Service of the United State Department of Interior." Many historic and cultural resources have been adversely affected by development projects through the demolition of architectural resources, and disturbance of archaeological sites. These resources are irreplaceable and important to the citizens of Delaware. They provide important information about our state's past and a visual connection to our state's heritage. In addition, preserving Delaware's heritage and highlighting the historic legacy of this state are the guiding principles of the Division of Historical & Cultural Affairs.

The policy and procedures of the Delaware Division of Historical & Cultural Affairs, in reference to the Preliminary Land Use Service process, is to provide information on the development's affect or impact on historical and cultural resources, such as historic

properties or archaeological sites, and be an advocate for their protection. In addition, this type of information is based upon the archival resources and reference materials of the Delaware State Historic Preservation Office, which is a part of the Division of Historical & Cultural Affairs.

- There are a few known historic and cultural resource sites near the property, and apparently, they are Archaeological Sites. The first one (**K-492, 7K-D-23**) seems to be very close to the parcel, or on the parcel, and it is located south of Road 347-west of 348-north of the small stream. The second one is the Lafferty Lane graveyard (**K-6397, 7K-D-111**) is nearby, and the third one (**K-6408, 7K-D-114**) as well.
- According to the **Beers Atlas of 1868**, the historical aspects it that this parcel is within the geographical area of Dover Hundred, and it appears that there were a few structures of some type in close proximity to where this parcel is located. These structures were associated with a Wm. Minus, Wm. Parvis, M. Reed, and J. Lafferty.
- Since the above findings did show and indicate that the project area has significant historical attributes, the developer should be aware that there is a potential or a possibility that there could be other historic or cultural resources on the project area, not discovered yet. These historical or cultural resources could be archaeological resource, such as, a cemetery or burial ground, unmarked human remains, or the parts or pieces of an object or structure from a certain historical time-period. The unexpected discovery of archaeological resources or unmarked human remains during construction can result in significant delays.
- The Division of Historic & Cultural Affairs strongly recommends that developer read **Chapters 53 and 54, in Title 7, of the Delaware State Code**. **Chapter 53** is in reference to the “Conservation of Archaeological Resources In or On State Lands”, and **Chapter 54** is in reference to the “**Delaware Unmarked Human Remains Act of 1987**”.
- The Division of Historic & Cultural Affairs also recommends that prior to any ground-disturbing activities, demolition, and before construction begins on the project area, the developer should consider the possibility of hiring an archaeological consultant to examine the project area thoroughly. This type of action will be beneficial in order to make sure that is no evidence or indication of a historic cemetery or burial ground, unmarked human remains, or the parts or pieces of an object or structure from a certain historical time-period.

Department of Transportation – Contact: Bill Brockenbrough 760-2109

- 1) What is the basis for the 600 trip per day trip generation estimate cited in Item 38 on the PLUS application? Based on the proposed acreage in lots (33.575), DelDOT estimates that the development would generate 2,205 trips per day. Using either number, the proposed development would warrant a traffic impact study under DelDOT’s newly adopted Standards and Regulations for Subdivision

Streets and State Highway Access. Grandfathering provisions will exempt this development if an application has been filed with the City and accepted for review by them before March 31, 2008. DelDOT anticipates having detailed comments regarding the site access and off-site improvements when they have reviewed the completed study.

- 2) Dover Land Enterprises, LLC proposes to develop contractor rental space on a parcel immediately west of the subject land. Their plan shows a stub street that appears to be slightly out of alignment with the one shown for the subject land. DelDOT supports the proposed interconnections in concept, but they must be coordinated.
- 3) DelDOT recommends that the sidewalks proposed on Lafferty Lane be extended along the internal streets in the development. All of the sidewalks should be five feet wide.

The developer's site engineer should contact our Subdivision Manager for the City of Dover, Mr. Natee Prasomsan, regarding our specific requirements for obtaining a letter of no objection. Mr. Prasomsan may be reached at (302) 760-25

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

Soils

According to the Sussex County soil survey update, Unicorn, Pineyneck, Othello, Fallsington, and Carmichael were mapped in the immediate vicinity of the proposed construction. Unicorn is a well-drained upland soil that has few limitations for development. Pineyneck is a moderately well-drained soil of low-lying uplands that has moderate limitations for development. Othello and Fallsington are a poorly-drained wetland associated (hydric) soil that has severe limitations for development. Approximately 60-70% of the soils mapped on subject parcel were mapped as Othello, Fallsington, and Carmichael; these soils have high potential to increase the intensity, duration, and frequency of future flooding events (both onsite and offsite) should they be filled, graded, or further disturbed. It is strongly recommended that such soils be avoided.

Wetlands

According to the Statewide Wetland Mapping Project (SWMP) mapping, palustrine forested and palustrine farmed wetlands were mapped over much of this parcel. The mapped occurrence of the wetlands closely mirrors the mapped occurrence of the hydric soils.

The applicant is responsible for determining whether any State-regulated wetlands (regulated pursuant to 7 Del.C., Chapter 66 and the Wetlands Regulations) are present on the property. This determination can only be made by contacting the Division of Water Resources' Wetlands and Subaqueous Lands Section at 302/739-9943 and consulting the State's official wetland regulatory maps, which depict the extent of State jurisdiction. The area regulated by State law may be very different from the area under federal authority. No activity may take place in State-regulated wetlands without a permit from DNREC's Wetlands Section.

In addition, most perennial streams and ditches and many intermittent streams and ditches are regulated pursuant to the Subaqueous Lands Act (7 Del.C., Chapter 72) and the Regulations Governing the Use of Subaqueous Lands. Ponds which are connected to other waters are also regulated, while isolated ponds are not. Any work in regulated streams, ditches or ponds requires a permit from the Wetlands and Subaqueous Lands Section. An on-site jurisdictional determination is recommended in order to determine whether any regulated watercourses exist on the property. Contact the Wetlands and Subaqueous Lands Section at 302/739-9943 to schedule an on-site visit. Such appointments can usually be scheduled within 2 to 3 weeks.

The applicant should also be reminded that they must avoid construction/filling activities in those areas containing wetlands or wetland associated hydric soils as they are subject to regulatory jurisdiction under Federal 404 provisions of the Clean Water Act. A site-specific field wetlands delineation using the methodology described in the 1987 United States Army Corps of Engineers (USACE, or "the Corps") manual is the only acceptable basis for making a jurisdictional wetland determination for nontidal wetlands in Delaware. The applicant is forewarned that the Corps views the use of the National Wetlands Inventory (NWI) mapping or the Statewide Wetlands Mapping Project (SWMP) mapping as an unacceptable substitute for making such delineations. To ensure compliance with said Corps regulatory requirements, it is strongly recommended that a field wetlands delineation using the above-referenced methodology be performed on this parcel before commencing any construction activities. It is further recommended that the Corps be given the opportunity to officially approve the completed delineation. In circumstances where the applicant or applicant's consultant delineates what they believe are nonjurisdictional isolated (SWANCC) wetlands, the Corps must be contacted to evaluate and assess the jurisdictional validity of such a delineation. The final jurisdictional authority for making isolated wetlands determinations ultimately rests with the Corps; they can be reached by phone at 736-9763.

According to information presented in the PLUS application form, a Corps-approved wetlands delineation was conducted. However, no evidence of this delineation was furnished for verification. It was also not clear whether the applicant contacted the State Wetlands Section for purposes of determining whether any State-regulated wetlands are present.

Impacts to Palustrine wetlands are regulated by the Corps through Section 404 of the Clean Water Act. In addition, individual 404 permits and certain Nationwide Permits

from the Corps also require 401 Water Quality Certification from the DNREC Wetland and Subaqueous Land Section and Coastal Zone Federal Consistency Certification from the DNREC Division of Soil and Water Conservation, Delaware Coastal Management Program (DCMP) Section. Each of these certifications represents a separate permitting process. Please be advised that Nationwide permits have been suspended in Delaware and are pending further coordination with the Corps. Therefore, contrary to past practices, Coastal Zone Management approval can no longer be assumed. Individual certifications must be granted from the DCMP office for each project intending to utilize a Nationwide Permit. For more information on the Federal Consistency process, please contact the DCMP office at 302.739.9283. To find out more about permitting requirements, the applicant is encouraged to attend a Joint Permit Process Meeting. These meetings are held monthly and are attended by federal and state resource agencies responsible for wetland permitting. Contact Denise Rawding at (302) 739-9943 to schedule a meeting.

Based on a review of existing buffer research by Castelle et al. (Castelle, A. J., A. W. Johnson and C. Conolly. 1994. *Wetland and Stream Buffer Requirements – A Review*. J. Environ. Qual. 23: 878-882), an adequately-sized buffer that effectively protects wetlands and streams, in most circumstances, is about 100 feet in width. In recognition of this research and the need to protect water quality, the Watershed Assessment Section recommends that the applicant maintain/establish a minimum 100-foot upland buffer (planted in native vegetation) from the landward edge of all wetlands and water bodies (including all ditches).

Impervious Cover

Based on a review of the PLUS application form, post-construction surface imperviousness was projected to reach about 50 percent. However, because this site is slated for commercial use it is likely that said estimate is a significant underestimate. When calculating surface imperviousness, it is important to consider all created forms of constructed surface imperviousness (i.e., rooftops, sidewalks, roads, and open-water stormwater management ponds) when calculating surface imperviousness; otherwise, an inaccurate assessment of this project's environmental impacts will result. Therefore, surface imperviousness should be recalculated if any of the above-mentioned forms of constructed surface imperviousness were omitted or excluded.

Studies have shown a strong relationship between increases in impervious cover to decreases in a watershed's overall water quality. It is strongly recommended that the applicant implement best management practices (BMPs) that reduce or mitigate some of its most likely adverse impacts. Reducing the amount of surface imperviousness through the use of pervious paving materials ("pervious pavers") in lieu of asphalt or concrete in conjunction with an increase in forest cover preservation or additional tree plantings are some examples of practical BMPs that could easily be implemented to help reduce surface imperviousness.

TMDLs

Total Maximum Daily Loads (TMDLs) for nitrogen and phosphorus have been promulgated through regulation for the Little Creek watershed. 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 required by federal law, states are charged with developing and implementing standards to support these desired use goals. In the Little Creek watershed, a post-development TMDL reduction level of 40% will be required for nitrogen and phosphorus. Additionally, a TMDL reduction level of 75% will be required for bacteria.

TMDL Compliance through the Pollution Control Strategy (PCS)

As stated above, TMDLs for nitrogen and phosphorus have been promulgated through regulation for the Little Creek Watershed. The TMDL for nutrients and bacteria calls for a 40% reduction in nitrogen and phosphorus and a 75% percent reduction in bacteria, respectively; both nutrient and bacterial reductions must be from baseline conditions. The Department has developed an assessment tool to evaluate how your proposed development may reduce nutrients and bacteria to meet the TMDL requirements. Additional nutrient reductions may be possible through the implementation of BMPs such as increasing passive, wooded open space (through native tree and shrub plantings), increasing upland buffer widths from wetlands, use of pervious paving materials to reduce surface imperviousness, and the deployment of green-technology stormwater management treatment technologies. Contact Lyle Jones at 302-739-9939 for more information on the assessment tool.

Water Supply

The project information sheets state water will be provided to the project by the City of Dover via a public water system. DNREC records indicate that the project is located within the public water service area granted to the City of Dover under Certificate of Public Convenience and Necessity 90-CPCN-07.

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 302-739-9944.

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. Contact the reviewing agency to schedule a pre-application meeting to discuss the sediment and erosion control and stormwater management components of the plan as soon as practicable and to discuss options for an outlet for stormwater. The site topography, soils mapping, pre- and post-development runoff, and proposed method(s) and location(s) of stormwater management should be brought to the meeting for discussion. The plan review and approval as well as construction inspection will be coordinated through the Kent Conservation District. Contact Jared Adkins at the Kent Conservation District at (302) 741-2600 for details regarding submittal requirements and fees.

Because of the parcel's location in an impaired watershed and the amount of impervious surface, green technology BMPs and low impact development practices should be considered a priority to reduce stormwater flow and to meet water quality goals.

The Sediment and Stormwater Management Program ensures sediment and erosion control plans and stormwater plans comply with local land use ordinances and policies, including the siting of stormwater management facilities. However, we do not support placement in resource protection areas or the removal of trees for the sole purpose of placement of a stormwater management facility/practice.

Drainage

The Drainage Program is aware of existing drainage concerns on Morgan Branch downstream of this area. Please contact the Sediment & Stormwater Program of the Kent Conservation District to discuss the probability of a downstream analysis for this project. The Drainage Program requests that the engineer take precautions 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 Program requests that the engineer check existing downstream conditions for function and blockages prior to the construction. Notify downstream landowners of the change in volume of water released on them.

Forested and Wetland Wildlife Habitat

Cumulative forest and wildlife habitat loss throughout the State is of utmost concern to the Division of Fish and Wildlife which is responsible for conserving and managing the State's wildlife (see www.fw.delaware.gov and the Delaware Code, Title 7). Because of an overall lack of habitat protection, DNREC has to rely on applicants and/or the entity that approves the project (i.e., counties and municipalities) to consider implementing measures that will aide in habitat loss reduction.

Forested Wetlands

A portion of this parcel contains forested wetlands which can support an array of plant and animal species. These forested wetlands occur specifically in the area of the parcel designated as 'Phase II'. Cumulative impacts are a concern as there are two other projects in the immediate area: Mitten Industrial Park and Dover Land Enterprises.

Recommendation: It is highly recommended that Phase II be designed with consideration for the environmental resources of this site and work within those constraints rather than fragmenting the forested area and degrading the wetlands. Forested wetlands should be protected, not developed.

Nuisance Waterfowl

Wet ponds created for stormwater management purposes may attract resident Canada geese and mute swans that will create a nuisance. 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.

The Division of Fish and Wildlife does not provide goose control services, and if problems arise, the property owner/land manager 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.

Recommendation: Exclusion is one of the most effective methods at deterring geese. In a commercial setting such as this project, completely fencing the pond at the edge (even one foot high) may be feasible. Even though geese can fly over the fence, if they constantly have to fly between land and water the area is less desirable. If fencing is not a desired option, DNREC recommends native plantings, including tall grasses, wildflowers, shrubs, and trees at the edge and within an adequate buffer (15-30 feet in width) around the ponds. When the view of the surrounding area from the pond is blocked, geese can't scan for predators and are less likely to reside and nest in the area of the pond. The vegetation also blocks the ability to easily move between land and water.

At this time, DNREC does not recommend using monofilament grids due to the potential for birds and other wildlife to become entangled if the grids are not properly installed and maintained. In addition, the on-going maintenance (removing entangled trash, etc.) may become a burden to the property owner/land manager.

Underground Storage Tanks

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

Candy Lane, Facility # 1-000449, Project # K 8912279
Bowers Sign, Facility # 1-000582, Project # K9904071
Tilcon Delaware, Inc., Facility # 1-000057, Project # K8804012

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 construction specifications would 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 with nitrile rubber gaskets in the contaminated areas.

Site Investigation and Restoration

The Site Investigation & Restoration Branch (SIRB) identified a Federal Superfund site located within a half mile radius of the proposed project. Dover Air Force Base (DE-0031) is located to the south of the proposed project and has undergone extensive investigation and remediation activities.

Historic review indicates that drums of industrial waste were disposed on and off the Base property between 1951 and 1970. The drums were earth-covered to a depth of three feet in five different areas on the Base. Heavy metals were found during the site investigation sampling in the shallow on-site groundwater, and some volatile organic compounds were found off-site. The groundwater flows in a southeast direction from the proposed project. There is a threat to human health and the environment if the groundwater from on-site is ingested.

The Base is currently undergoing a long-term remedial phase. Some contaminated areas of the Base have been capped and cleared of all contaminants; five areas within the Base have completed an interim action completion report. Dover Air Force Base is continuing with the clean-up. Based on the review of available data, SIRB foresees no negative impact to the proposed project since surface water and groundwater from the Base site flows into the Saint Jones River and not towards the proposed project.

Should release or imminent threat of a release of hazardous substances be discovered during the course of development (e.g., contaminated water or soil), construction activities should be discontinued immediately. Also, DNREC should be notified immediately at the 24-hour emergency number (800-662-8802). In addition, SIRB should be contacted as soon as possible at 302-395-2600 for further instructions.

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

This location/parcel, being situated within the city limits of Dover, the Office of the State Fire Marshal defers to the City Fire Marshal for comments.

Department of Agriculture - Contact: Scott Blaier 739-4811

The Delaware Department of Agriculture has no objections to the proposed project. It is located within the City of Dover, and the *Strategies for State Policies and Spending* encourages environmentally responsible development in Investment Level 3 areas.

Right Tree for the Right Place

The Delaware Department of Agriculture Forest Service 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. To further support this concept the Delaware Forest Service does not recommend the planting of the following species due to the high risk of mortality from insects and disease:

Callery Pear

Ash Trees

Leyland Cypress

Red Oak (except for Willow Oak)

If you would like to learn more about the potential problems or impacts associated with these trees, please contact the Delaware Forest Service for more information at (302) 698-4500.

Native Landscapes

The Delaware Department of Agriculture and the Delaware Forest Service 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 our rivers and creeks of storm-water run-off pollutants. To learn more about acceptable native trees and how to avoid plants considered invasive to our local landscapes, please contact the Delaware Department of Agriculture Plant Industry Section at (302) 698-4500.

Public Service Commission - Contact: Andrea Maucher 739-4247

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.

Department of Education – Contact: John Marinucci 735-4055

This proposed project is in the Capital School District. This site plan review is commercial in nature with no apparent impact on educational service delivery or infrastructure and, as such DOE has no further comments regarding this request.

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 Dover