



STATE OF DELAWARE  
EXECUTIVE DEPARTMENT  
OFFICE OF MANAGEMENT AND BUDGET  
Budget Development, Planning and Administration  
State Planning Coordination

October 28, 2008

Wendy King  
Town of Newport  
P.O. Box 3053  
Newport, DE 19804

RE: PLUS review – 2008-09-07; Town of Newport

Dear Mr. Shade:

Thank you for meeting with State agency planners on October 1, 2008 to discuss the update of the Town of Newport comprehensive plan. State agencies have reviewed your current plan and have asked that the following be considered when you update your plan.

**Office of State Planning Coordination – Contact: Herb Inden 739-3090**

Our office would like to commend the Town of Newport for taking advantage of our new Pre-Update (PLUS) Review Process. As always, our office appreciates the efforts that Newport puts into the development of its comprehensive plans, especially in its willingness to work with state agencies and we look forward to continuing this relationship with this update.

Newport's current certified plan meets all of the requirements of a "Municipal Development Strategy" for towns of 2000 or less residents. Taking into consideration the comments from this meeting should help in making for a smooth certification process for this plan update.

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

No comments received.

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

The Town of Newport proposes to update its 2003 Comprehensive Plan and has requested a pre-update review. Attached for further consideration is a copy of our Land Use Planning Act comments on a pre-adoption draft of the 2003 Plan. While some of these comments have been addressed others have not.

Please note one additional point, which DelDOT overlooked in 2003, concerning Section 5.6, Alternative Transportation. DART First State’s Paratransit Service is available not only to persons with disabilities, as defined by the Americans with Disabilities Act, but also to all Delaware residents over 60 years of age.

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

**General Comments**

It was noted on the PLUS application form, Comprehensive Plan/Amendment Checklist, that the Town’s Comprehensive Plan was lacking an Environmental Protection Plan, a Water and Wastewater Plan, and an Open Space and Recreation Plan. Furthermore, the Plan did not address Total Maximum Daily Loads (TMDLs) or Source Water Protection. The following comments are intended to at least partially address those missing elements of the Plan.

**Water Resources/Water Quality**

*General Comments*

The Plan should make specific recommendations for reducing imperviousness. The following recommendations could be incorporated as goals and/or objectives that could lead to legislative actions:

1. Require the use of pervious paving materials, whenever practicable, in lieu of conventional paving materials. The use of pervious paving materials is especially important for large commercial parking lot areas. Studies have shown a strong relationship between increases in impervious cover to decreases in a watershed’s overall water quality. Reducing the amount of surface imperviousness through the use of pervious paving materials (“pervious pavers”) in lieu of asphalt or concrete, is an example of a practical BMP that could easily be implemented to help reduce surface imperviousness.
2. Require an impervious surface mitigation plan for all residential and commercial development exceeding 20% imperviousness. The impervious surface mitigation plan should demonstrate that the impervious cover in excess of 20% will not impact ground water recharge, surface water hydrology, and/or water quality of the site and/or adjacent properties. If impacts to groundwater recharge, surface

water hydrology will occur, the plan should then demonstrate mitigation of said impacts and/or if impacts cannot be mitigated, the site plan will be modified to reduce the impact of impervious cover. Additionally, it is further recommended the pervious paving materials be required. In commercial areas, it is strongly recommended that pervious paving materials be required for at least 50% of the total paved surface area(s).

- Define how developers may calculate surface imperviousness. The calculation for surface imperviousness include all of the following forms of constructed surface imperviousness: all paved surfaces (e.g., roads, sidewalks, and parking areas), rooftops, and open-water stormwater management structures.

The Plan should make a recommendation to protect open space

1. It is strongly recommended that the Town exclude structural Best Management Practices (BMPs) such as community wastewater treatment areas, open-water stormwater treatment structures and wetlands from consideration as open space.

#### *Specific Comments*

The following comments pertain to the General Land Uses section (section 6.0):

Page 24, Section 6.2.6, under the Christiana River heading (Should be corrected or changed to Christina): DNREC feels that water quality and total maximum daily loads should include more specifics and clarifying commentary. Therefore, they suggest that you eliminate the existing narrative under this section and replace with the following narrative and table:

Newport is located within the Christina River watershed which is impaired according to Section 303(d) of the Clean Water Act. Under Section 303(d) of the 1972 Federal Clean Water Act (CWA), states are required to identify all impaired waters and establish total maximum daily loads to restore their beneficial uses (e.g., swimming, fishing, and drinking water). A TMDL defines the amount of a given pollutant that may be discharged to a water body from point, nonpoint, and natural background sources and still allows attainment or maintenance of the applicable narrative and numerical water quality standards. A TMDL is the sum of the individual Waste Load Applications (WLAs) for point sources and Load Allocations (LAs) for nonpoint sources and natural background sources of pollution. A TMDL may include a reasonable margin of safety (MOS) to account for uncertainties regarding the relationship between mass loading and resulting water quality. In simplistic terms, a TMDL matches the strength, location and timing of pollution sources within a watershed with the inherent ability of the receiving water to assimilate the pollutant without adverse impact. A Pollution Control Strategy (PCS) identifies the actions necessary to systematically achieve the pollutant load reductions specified by the Total Maximum Daily Load(s). Reducing the pollutants to the level specified by the TMDL(s) will ensure that a water body meets the water quality criteria

and goals required for compliance with the State Water Quality Standards. The projected completion and passage of the Christina River PCS is expected by September 2009.

The Town of Newport is located within the Christina River watershed of the greater Piedmont drainage. This watershed is assigned a range of nutrient (nitrogen and phosphorus) and bacterial TMDL load reduction requirements that, as mentioned previously, must be met in order to meet the State Water Quality Standards (See table 1).

<b>Piedmont Drainage</b>	<b>N- reduction requirements</b>	<b>P-reduction requirements</b>	<b>Bacteria-reduction requirements</b>
Christina River	0-62% High Flow	0-77% High Flow	29-95% High Flow

Table 1: TMDL nutrient (nitrogen and phosphorus) and bacteria reduction requirements for the Christina River watershed.

Page 24 or 25: We suggest the Plan narrative mention specific Federal and State wetlands regulatory programs for protecting nontidal and tidal wetlands.

“Regulatory Protection of wetlands is mandated under Section 404 provisions of the Federal Clean Water Act. Certain other wetlands (mainly in tidal areas) are accorded additional regulatory protection under Title 7 Chapter 66 provisions of the State of Delaware’s Code. Compliance with these statutes may require an Army Corps of Engineers approved field wetlands delineation and/or an official DNREC wetland jurisdictional determination.”

Page 26, Section 7.1, Goals and Objectives: This section should offer more specific “actionable” environmental protection strategies than currently offered, such as:

- a) Requiring all applicants to submit to the City a copy of the development site plan showing the extent of State-regulated wetlands (as depicted by the State Wetland Regulatory Maps), and a United States Army Corps of Engineers (USACE) approved wetlands delineation as conditional approval for any new commercial and/or residential development. Additionally, the site plan should depict all streams and ditches which are jurisdictional pursuant to the Subaqueous Act (7 Del. C., Chapter 72) as determined by DNREC.
- b) Legislation to help protect freshwater wetlands where regulatory gaps exist between federal and state jurisdictions (i.e., isolated wetlands and headwater wetlands).
- c) Requiring, where appropriate, up to a 100-foot upland buffer width from all wetlands or water bodies (including ditches).

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), 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).

- d) Exclude structural Best Management Practices (BMPs) such as community wastewater treatment areas, open-water stormwater treatment structures and regulated wetlands from consideration as open space.
- e) Requiring an impervious cover mitigation plan for all residential developments exceeding 20% imperviousness. In commercial developments, it is strongly recommended that pervious paving materials be required for at least 50% of the total paved surface area(s) where practicable.
- f) Requiring the calculation for surface imperviousness for all commercial and residential development include all constructed forms of surface imperviousness, including all paved surfaces (roads, parking lots, and sidewalks), rooftops, and open-water stormwater management structures.
- g) Requiring the assessment of a project's TMDL nutrient loading rate through use of the Department's nutrient budget protocol. The applicant should be further required to use any combination of approved Best Management Practices (BMPs) to meet the required TMDLs for the affected watershed(s) in question.
- h) Prohibiting development on hydric soil mapping units. Proof or evidence of hydric soil mapping units should be provided through the submission of the most recent NRCS soil survey mapping of the parcel or through the submission of a field soil survey of the parcel by a licensed soil scientist.
- i) Requiring the applicant to use "green-technology" stormwater management in lieu of "open-water" stormwater management ponds whenever practicable.

### **Water Resource Protection Areas**

The Plan does not contain any language that refers to source water protection. The review found an area of excellent ground-water recharge within the municipal boundary and extending into the area of proposed annexation.

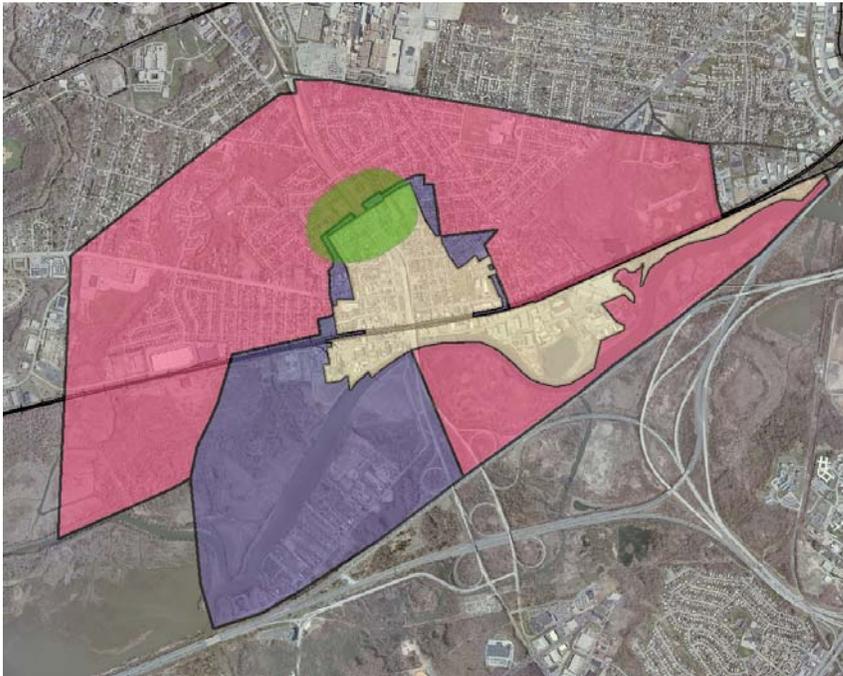
The 2000 Census reported the population of Newport at 1,100 persons. According to Del. Code Title 7 Chapter 60 Subchapter VI, § 6082 the Town is not required to adopt a

source water protection ordinance. It would benefit the Town to develop a source water protection ordinance to protect the resource.

DNREC strongly encourages the Town of Newport to adopt a source water protection ordinance to identify excellent recharge areas as Critical Areas that need protection to insure a sufficient supply of clean drinking water.

### **Map of the Town of Newport Comprehensive Plan Update (PLUS 2008-09-07)**

The municipal boundaries are shown in beige with a black outline. Delineated excellent recharge areas are shown in green. Short term annexation areas are in purple and pink indicates long term annexation areas.



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

- Continue to address stormwater retrofits in areas of re-development. Reach out to the New Castle Conservation District, New Castle County, and the Delaware Clean Water Advisory Council as partners in funding stormwater retrofits.
- Review Town ordinances and revise as necessary to promote green technology best management practices for stormwater.
- Be advised the Sediment and Stormwater Program is currently undergoing revisions to the sediment and stormwater regulations. It is unclear at this time when the new regulations will be promulgated.

- Please provide any developer or engineer considering developing within your jurisdiction the following information:

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. 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 New Castle Conservation District. Contact the New Castle Conservation District at (302) 832-3100, Ext. 3 for details regarding submittal requirements and fees.

## **Natural Heritage and Endangered Species**

### **Wetlands**

The Town should consider permanent protection of wetlands on lands depicted as “Areas of Concern” and “Near Term Potential Annexation (1-5 yrs)” on Exhibit 8.11 (Proposed Annexation Plan) and Exhibit 8.12 (Annexation Plan Aerial Overlay).

The majority of wetlands contained within these areas are mapped as ‘key wildlife habitat’ in the Delaware Wildlife Action Plan (DEWAP). DEWAP is a comprehensive strategy for conserving the full array of native wildlife and habitats-common and uncommon- as vital components of the state’s natural resources. This document can be viewed via our program website at <http://www.dnrec.state.de.us/nhp>. This document also contains a list of species of greatest conservation need as well as species-habitat associations.

Upland buffers surrounding these wetlands are extremely important for the protection of water quality and for providing critical habitat for wetland dependent species. We recommend preservation, but if these areas are developed, the Town should require that upland buffers along wetlands are at least 100ft (preferably 300ft in some cases) in width. These buffer areas should not contain structures, infrastructure or lot lines.

### **Rare Species**

DNREC highly recommends that the Town require developers, or applicants of development projects, to contact the Natural Heritage and Endangered Species Program (NHESP) of DNREC’s Division of Fish and Wildlife to determine if their project activities will impact a state-rare or federally listed species. In some cases a site visit may be requested in order to provide the necessary information. The Town should then

consider requiring implementation of recommendations provided by the NHESP before approving site plans.

Contact information:

Environmental Review Coordinator  
Natural Heritage and Endangered Species Program  
DNREC-Division of Fish and Wildlife  
4876 Hay Point Landing Rd  
Smyrna, DE 19977

Conservation Areas

Exhibit 8.16 (Existing and Proposed Land Use) includes land with a proposed zoning of 'CON Conservation Areas (Open Space)'. These same areas are given a land use code of 'Very Low-(0-1 dwelling units per acre) as per the New Castle County Comprehensive Plan, Map 4. This type of land use does not typically fit into the definition of Open Space. While 1 dwelling per acre is a low density, that same dwelling could have a large footprint if amenities such as paved areas etc. are included.

According to section 2.3 of the Town of Newport's Comprehensive Plan, efforts are going to be made to work in concert with and advance the goals and objectives of New Castle County's plan. Does the Town intend to use those areas proposed as 'Conservation/Open Space' *only* for passive and active recreation or are they going to permit development of '0-1 dwelling unit per acre'?

*Site Specific Comments:*

1) Tax Parcel 1000800039

This tax parcel is included in lands outlined as '¼ mile radius from municipal boundary' depicted in Exhibit 8.16. It is also included in "Areas of Concern" on Exhibit 8.11 & 8.12, but it is unclear what the intended zoning or development potential is for this parcel. DNREC has records of 5 species of conservation concern associated with the wetlands and some areas of upland on this parcel. The wetlands on this parcel are also identified as key wildlife habitat in DEWAP (as explained above). Any development of this parcel should include contact with NHESP to ensure that rare species are not impacted.

2) Tax Parcel 0704640310

This tax parcel is included within lands designated as "Near Term Potential Annexation" on Exhibits 8.11 & 8.12. The proposed zoning for this parcel is 'redevelopment'. DNREC has records of several rare plants, a state-listed endangered bird, and two unique natural vegetation communities. They highly recommend that any efforts to redevelop this parcel include measures that protect rare species and the habitat necessary to support their persistence at this site. This would require coordination with the NHESP.

## **Recreation**

In May and June of 2008, the Division of Parks and Recreation conducted a telephone survey of Delaware residents to gather information on outdoor recreation patterns and preferences as well as other information on their landscape perception. These findings will be the foundation of the 2008-2011 Statewide Comprehensive Outdoor Recreation Plan (SCORP) providing guidance for investments in needed outdoor recreation facilities.

Ninety-two percent of residents living in northern New Castle County indicated that outdoor recreation was very or somewhat important to them. Based on the public opinion survey, the most needed outdoor recreation facilities in northern New Castle County include: walking/jogging paths, bicycle paths, playgrounds, hiking trails, public swimming pools, open spaces for passive recreation, picnic areas, and fishing access. Because of the importance of outdoor recreation in northern New Castle County, the Town of Newport should work to incorporate some of these opportunities in the development of their comprehensive plan. For more information on the outdoor recreation public opinion survey or the Statewide Comprehensive Outdoor Recreation Plan, please contact: Kendall Sommers @ 302.739.9235.

The Division of Parks and Recreation provides matching grant assistance through the Delaware Land and Water Conservation Trust Fund (DTF) to local governments for land acquisition and for park development. Lands that have received DTF assistance must remain as open space for conservation or recreation purposes in perpetuity. Ella Johnson Park, located on W. Ayre Street, has received funding through the DTF program. For more information on the Delaware Land and Water Conservation Trust Fund, please contact: Robert Ehemann @ 302.739.9235.

## **Site Investigation and Restoration**

The Site Investigation and Restoration Branch (SIRB) encourages the development of Brownfields and can provide assistance when investigating and remediating Brownfield sites. Although SIRB has no specific comments regarding the proposed comprehensive plan at this time, if any future development occurs on sites with previous manufacturing, industrial, or agricultural use, SIRB recommends that a Phase I Environmental Site Assessment be conducted prior to development, due to the potential for a release of hazardous substances. If a release or imminent threat of a release of hazardous substances is discovered during the course of future development (e.g., contaminated water or soil); construction activities should be discontinued immediately, and DNREC should be notified 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.

### **Under/Aboveground Storage Tanks**

Should any underground storage tanks or petroleum-contaminated soil be discovered by any person during construction, the Delaware Department of Natural Resources and Environmental Control-Tank Management Branch (DNREC-TMB) and the DNREC Emergency Response Hotline at must be notified within 24 hours. The DNREC-TMB and the Emergency Hotline may be reached at (302) 395-2500 and at (800) 662-8802, respectively. In addition, should any contamination be encountered, PVC pipe materials will have to be replaced with ductile steel and nitrile rubber gaskets in the contaminated areas.

All plans for UST system installations must be approved in advance by the TMB with exception of UST systems of 1,100 gallons or less that contain heating fuel for consumptive use on the premise where it is stored or systems that contain motor fuels for non-commercial purposes.

If any aboveground storage tanks (ASTs) less than 12,500 gallons are installed, they must be registered with the DNREC-TMB. If any ASTs greater than 12,500 gallons are installed, they are subject to installation approval by the DNREC-TMB.

Should the municipality anticipate being more restrictive than Delaware's *Regulations Governing Underground Storage Tank Systems* or Delaware's *Regulations Governing Aboveground Storage Tanks*, please be aware that the municipality shall be responsible for enforcing the more restrictive rules.

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

No comments received.

### **Department of Agriculture - Contact: Scott Blaier 739-4811**

The Department would like to commend the Town of Newport for participating in a pre-update of its comprehensive plan with the PLUS group. The Department offers the following suggestions to incorporate into the comprehensive plan.

The Delaware Forest Service encourages the Town of Newport to develop a formal urban forestry management plan that addresses a tree canopy goal. Trees are a vital part of any community and the Delaware Forest Service recommends that trees be preserved during the development process. A tree ordinance protecting existing woodlands in future development as well as existing street trees can be developed and implemented to address this issue. The Delaware Urban & Community Forestry Program would be glad to offer assistance. Please contact the Delaware Forest Service for more information at (302) 659-6705 or 698-4547.

The Department encourages the town to develop and promote agricultural business whenever possible, specifically farm markets. The Department now has a fully staffed

marketing section, and we encourage the town to contact them at (302) 698-4535 to see how they can help. Please contact Kelli Steele of the Department's marketing section to explore agricultural economic development activities. Food safety, nutrition, and wholesomeness are consumer priorities these days, and many people are turning to local sources of food supply. As a result, there are a number of agricultural development opportunities.

**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.

**Delaware Economic Development Office – Contact: Jeff Stone 672-6849**

No comments received.

**Delaware Division of Public Health- Health Promotion Bureau- contact Michelle Eichinger (302) 744-1011**

Ensuring that new residential and commercial development incorporates pedestrian- and bicycle-friendly features allows people to travel by foot or by bicycle and promotes physical activity as part of daily routines. Regular physical activity offers a number of health benefits, including maintenance of weight and prevention of heart disease, type 2 diabetes and other chronic diseases.<sup>1</sup> Research shows that incorporating physical activity into daily routines has the potential to be a more effective and sustainable public health strategy than structured exercise programs.<sup>2</sup> This is particularly important considering about 65% of adult Delawareans are either overweight or obese.<sup>3</sup> This current obesity crisis is also affecting children. Approximately 37% of Delaware's children are overweight or obese<sup>4</sup>, which places them at risk for a range of health consequences that include abnormal cholesterol, high blood pressure, type 2 diabetes, asthma, depression and anxiety.<sup>1</sup>

In Delaware, as in other states across the nation, certain patterns of land use can act as a barrier to physical activity and healthy eating for children and adults alike. Examples of such barriers include neighborhoods constructed without sidewalks or parks and shopping centers with full-service grocery stores situated too far from residential areas to allow for walking or biking between them.

As a way to promote physical activity and access to healthy foods, we recommend that the following be included in the Town of Newport Pre-Update Comprehensive Review:

**Increase opportunities for physical activity**

- Survey residents for ideas for recreational activities/programming as part of a recreation plan. Residents may benefit from organized recreational programming for all ages, especially for the growing senior population. In addition, please refer

- to the Statewide Comprehensive Outdoor Recreation Plan from the Division of Parks of Recreation.
- Explore facilities that provide opportunities for indoor recreation for residents of all ages. Although the Town of Newport provides amenities for outdoor recreation, there would be limited use of such amenities during inclement weather and during the winter season.

### **Increase opportunities for healthy eating**

- Designate an area for a seasonal farm stand or mini farmer's market that will promote the sale of fruits and vegetables.
- Designate an area for a community garden. Community gardens not only provide residents access to healthy nutrition, but they also provide opportunities for physical activity and community cohesiveness.<sup>5</sup>

### **Promote a healthy community**

- Explore ways to promote a healthy community in the Town of Newport. The Division of Public Health with the University of Delaware's Institute for Public Administration produced a resource manual to increase opportunities for a healthy community. Included in this manual are strategies to fund and gain support for projects and opportunities. Here is the link to this document, [http://www.ipa.udel.edu/publications/HealthyCommunities\\_guideWeb.pdf](http://www.ipa.udel.edu/publications/HealthyCommunities_guideWeb.pdf)

<sup>1</sup> Nemours Health and Prevention Services (2005). *Delaware Children's Health Chartbook*, Newark, DE.

<sup>2</sup> Active Living by Design. *Transportation Fact Sheet*. Retrieved May 17, 2007, from [http://www.activelivingbydesign.org/fileadmin/template/documents/factsheets/Transportation\\_Factsheet.pdf](http://www.activelivingbydesign.org/fileadmin/template/documents/factsheets/Transportation_Factsheet.pdf).

<sup>3</sup> Delaware Health and Social Services (2008), *Division of Public Health, Behavioral Risk Factor Surveillance System (BRFSS), 1990-2007*.

<sup>4</sup> Nemours Health and Prevention Services (2007). *2006 Delaware Survey of Children's Health Descriptive Statistics Summary, Volume 1*.

<sup>5</sup> Hancock, T. (2001). People, partnerships and human progress: building community capital. *Health Promotion International*, 16(3), 275-80.

### **Delaware State Housing Authority – Contact Vicki Powers 739-4263**

DSHA has reviewed the existing Certified Comprehensive Plan to advise the Town of Newport of new regulations passed since its certification in 2003 that should be included in their scheduled update. Since 2003, there has not been new regulations passed for housing, however we encourage the Town of Newport to pursue a balanced housing stock, in the development of their Comprehensive Plan that will allow residents a choice in where they want to live without putting a strain on their purse strings. A balanced housing stock in any town can significantly improve the quality of life for residents and the economic competitiveness of the region. We offer the following resources to help you in this effort:

- DSHA has developed a guide to help assist in writing any town's housing element: *Creating a Balanced Housing Stock: A Guide to Writing Your Town's Housing Element* outlines the steps in preparing a housing element for any Comprehensive Plan. Furthermore, DSHA is willing to work with the Town of Newport to provide data and technical assistance.
- In addition to our guide we have developed a website, Affordable Housing Resource Center, to learn about resources to help address the Town's housing needs. Our website can be found at: [www.destatehousing.com](http://www.destatehousing.com) "Affordable Housing Resource Center" under our new initiatives.
- In partnership with the University of Delaware Institute for Public Administration and Office of State Planning, we are holding a workshop on November 6, 2008 from 9:00 am to 12:00 pm. The course is titled, "**Housing for Delaware: Balancing Community Needs**". This course explores the housing challenge Delawareans face and the resources and tools available to address these challenges. An up-to-date overview of the needs for housing in Delaware will be provided, particularly the needs of our low- and moderate-income households. This material will be of value to elected officials, county and local staff, and any others concerned about housing. Interested parties can register for this course at: [www.ipa.udel.edu/events.html](http://www.ipa.udel.edu/events.html)
- If you have any questions or would like to meet with DSHA, please feel free to contact Victoria Powers at (302) 739-4263 ext. 219 or via e-mail at [vicky@destatehousing.com](mailto:vicky@destatehousing.com). Thank you.

**Department of Education – Contact: John Marinucci 735-4055**

No comments received.

Thank you for the opportunity to review this plan. The State agencies look forward to working with the Town as you update your plan. Please feel free to contact us if you need additional information while preparing this update.

Sincerely,



Constance C. Holland, AICP, Director  
Office of State Planning Coordination

CC: New Castle County