



**STATE OF DELAWARE  
EXECUTIVE DEPARTMENT  
OFFICE OF STATE PLANNING COORDINATION**

October 13, 2010

Mr. Gregory Moore  
Becker Morgan Group  
309 S. Governor's Avenue  
Dover, DE 19901

RE: PLUS review – 2010-08-01- Capital School District/New Dover High School

Dear Mr. Moore:

Thank you for meeting with State agency planners on August 25, 2010 to discuss the proposed plans for the new Dover High School project to be located on Forest Avenue west of Mifflin Road.

According to the information received, you are seeking site plan approval through the City of Dover for a 235,000 sq. ft. high school and sports fields on 102 acres.

Please note that changes to the plan, other than those suggested in this letter, could result in additional comments from the State. Additionally, these comments reflect only issues that are the responsibility of the agencies represented at the meeting. **The developers will also need to comply with any Federal, State and local regulations regarding this property. We also note that as the 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.**

**Strategies for State Policies and Spending**

This parcel is located within a Level 2 area according to the Strategies for State Policies and Spending. Investment Level 2 reflects areas where growth is anticipated by local, county, and State plans in the near term future. State investments will support growth in these areas.

When State dollars are invested to construct critical community infrastructure, such as this new school, it is important that these investments leverage as many community benefits as possible in accordance with the Strategies for State Policies and Spending. The proposed new school is situated in a location that is critical to achieve long term interconnectivity for both regional and local traffic in accordance with a regional transportation plan prepared by the Dover / Kent MPO

(known as the Delaware 8 Concept Plan and Operations Study, May 2008). The MPO engaged DelDOT, The City of Dover, Kent County, the Capital School District and many other stakeholders when developing this plan, and is actively working with DelDOT and others to implement it.

The PLUS meeting included a discussion regarding design options for this school property to enable the interconnections envisioned by this plan to occur, while also meeting the site design goals of the school district in regards to site access, safety and security. A follow up meeting was hosted by the Office of State Planning Coordination to further these discussions, and we are pleased that additional meetings and further dialogue on these issues continues. It will be important for a consensus to be reached on the final site design to achieve the goals of all stakeholders.

### **Code Requirements/Agency Permitting Requirements**

#### **State Historic Preservation Office – Contact Terrence Burns 736-7404**

- There are no known cultural or historic resources such as an archaeological site or listed National Registered site on this parcel/property. However, the Beers Atlas of 1868 shows the Rev. C. Huntington House where the existing buildings are, and the W. H. Ennis House on Forrest Street in the western end of the parcel, and they might have been historic farms as well.

The USDA 1937 aerial also shows some additional development west of the Huntington House, which may be another house or a barn and there seems to be areas of high potential for historic archaeological sites here as well, such as a small, rural or family cemetery. On many occasions, small, rural, or family cemeteries are often related to historic farm complexes, and usually they are a good distance behind or to the side of the house. With this in mind, the school district should be aware of Delaware's Unmarked Human Remains Act of 1987, which governs the discovery and disposition of such remains. The unexpected discovery of unmarked human remains during construction can result in significant delays while the process is carried out. Therefore, prior to any demolition or ground-disturbing activities, the developer may want to consider hiring an archaeological consultant to examine the parcel for archaeological sites, including a cemetery or unmarked human remains.

- If there is any federal involvement with the project, in the form of licenses, permits, or funds, the federal agency, often through its client, is responsible for complying with Section 106 of the National Historic Preservation Act (36 CFR 800) and must consider their project's effects on or in reference to historic or cultural resources. For example, if the ditch running through the property will be altered, the school district will probably need an Army Corps of Engineers wetlands permit. If that is the case, the school district will be required to consult with us under Section 106 of the National Historic

Preservation Act of 1966 (as amended), and may be required to undertake archaeological testing, depending on the Corps area of jurisdiction.

Department of Transportation – Contact Bill Brockenbrough 760-2109

- The site access must be designed in accordance with DelDOT's Standards and Regulations for Subdivision Streets and State Highway Access. This manual is available on-line at [http://www.deldot.gov/information/pubs\\_forms/manuals/subdivisions/pdf/Subdivision\\_Manual\\_Revision\\_1\\_proposed\\_060110.pdf](http://www.deldot.gov/information/pubs_forms/manuals/subdivisions/pdf/Subdivision_Manual_Revision_1_proposed_060110.pdf).
- Based on its trip generation, shown on the PLUS application, the proposed school warrants a traffic impact study, per Section 2.3.1 of DelDOT's Standards and Regulations for Subdivision Streets and State Highway Access. If a satisfactory conclusion cannot be reached regarding the connector road discussed below under Suggestions, DelDOT will require this study. Per Section 2.5.1 of the said document, the District's site engineer may contact Mr. Troy Brestel, a project engineer in the Development Coordination Section to establish a scope of work for the study. Mr. Brestel may be reached at (302) 760-2167.

As the study could identify off-site road improvements that should take place before the school opens, DelDOT would withhold its "Letter of No Objection" (see below) until the study is complete and appropriate notes are added to the plan.

- As indicated on the PLUS application, the development's trip generation was estimated using the Institute of Transportation Engineers' (ITE) Trip Generation report. That report provides rates and equations based on studies of existing developments. The report shows that a significant number of high schools have been surveyed, and provides data on trip generation as a function of three variables, number of students, number of employees and floor area (each examined independently). However, none of those variables explain the data especially well. In most cases a fitted curve equation is not provided, and where one is provided, the  $R^2$  is always less than 0.60. Therefore, in accordance with Section 2.9.6 of the Standards and Regulations, DelDOT anticipates requiring that the developer supplement the ITE data with traffic counts done at the existing school.
- Forrest Avenue is classified as a Minor Arterial, which per Section 3.6.5 of DelDOT's Standards and Regulations for Subdivision Streets and State Highway Access requires an 80-foot right-of-way (40-feet from centerline of right-of-way). Therefore, in accordance with the section just cited, additional right-of-way should be dedicated to public use in order to obtain the required rights-of-way along the entire property frontage. The right-of-way dedication notes should read as follows, "A 40' strip of right-of-way from the road centerline of Forrest Avenue is hereby dedicated to public use as per this plat."

- According to Section 3.6.5 of DelDOT's Standards and Regulations for Subdivision Streets and State Highway Access, a 15-foot wide permanent easement with a multimodal path should be provided along the frontage of the site on Forrest Avenue.
- DelDOT anticipates that the City of Dover will require a "Letter of No Objection" from the Department for this project. Per Section 3.4 of DelDOT's Standards and Regulations for Subdivision Streets and State Highway Access, the developer must submit **three (3) signed and sealed paper copies and one electronic (pdf) copy** of the **record plan**, with an Initial Stage Fee Calculation Form and the Initial Stage Fee. The review fee will be based on the number of lots within the subdivision. Please make all submissions to Mr. Julio Seneus, Subdivision Manager. The entrance plan will not be reviewed until after the "Letter of No Objection" has been issued.
- As specified in Section 4.1 of DelDOT's Standards and Regulations for Subdivision Streets and State Highway Access, when the entrance construction plans are submitted for review, the developer must submit **two (2) paper copies and one electronic (pdf) copy** of the construction plans, one copy of the record plan, an Initial Stage Fee Calculation Form, a Construction Stage Fee Calculation Form, a Construction Stage Review Fee, an application for highway entrance permit and a signed and sealed commercial entrance design checklist for review and approval. Be advised that the Department will not review the entrance plan until it has signed off on the record plan. Please make all submissions to Mr. Julio Seneus, Subdivision Manager.

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

- **TMDLs.** The project is located in the greater Delaware River and Bay drainage, specifically within the St. Jones River watershed. In this watershed, the State of Delaware has developed specific Total Maximum Daily Load (TMDL) pollutant reduction targets for nitrogen, phosphorus, and bacteria. A TMDL is the maximum level of pollution (i.e., point and nonpoint sources) allowed for a given pollutant below which a "water quality limited water body" can assimilate and still meet State water quality standards (e.g., dissolved oxygen, nutrients, and bacteria; *State of Delaware Surface Water Quality Standards, as amended July 11, 2004*) to the extent necessary to support use goals such as, swimming, fishing, drinking water and shell fish harvesting. TMDLs are required by federal law (Section 303(d) of the 1972 Clean Water Act), and the states are charged with developing and implementing specific practices that support the realization of these desired use goals. The TMDL for the St. Jones River watershed calls for a 40 percent reduction in nitrogen and phosphorus from baseline conditions. The TMDL also calls for a 90 percent reduction in bacteria from baseline conditions. The specific required nutrient and bacterial reductions can also be retrieved and reviewed in the following web link and webpage (click on TMDLs under Services on left side of web page): <http://www.dnrec.delaware.gov/Pages/default.aspx>

- A nutrient management plan is required under the Delaware Nutrient Management law (3 Del. Chapter 22) for all persons or entities who apply nutrients to lands in excess of 10 acres. The combined parcel land area of this project will likely exceed this 10-acre threshold. Please contact the Delaware Nutrient Management Program at 739-4811 for further information concerning compliance requirements.
- **Water Supply.** The information provided indicates that the City of Dover will provide water to the proposed projects through a public water system. If the City hasn't already done so, please notify the Public Service Commission of the annexation of this property so that the Certificate of Public Convenience and Necessity (CPCN) can be extended.
- 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.
- **Sediment and Stormwater Program.** In accordance with Title 7, Delaware Code, Chapter 40 and the Delaware Sediment and Stormwater Regulations, 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 DNREC Division of Watershed Stewardship Sediment and Stormwater Program. Contact Elaine Webb with the Sediment and Stormwater Program at (302) 739-9921, for details regarding submittal requirements and fees.
- In accordance with Title 7, Delaware Code, Chapter 60 and the Regulations Governing the Control of Water Pollution, Section 9.1.02, known as Special Conditions for Stormwater Discharges Associated with Construction Activities, a Notice of Intent (NOI) for Stormwater Discharges Associated with Construction Activity must be submitted to DNREC Division of Soil and Water Conservation along with the \$195 NOI fee prior to plan approval.
- Applying practices to mimic the pre development hydrology on the site, promote recharge, maximize the use of existing natural features on the site, and limit the reliance on structural stormwater components, such as maintaining open spaces, should be considered in the overall design of the project as a stormwater management technique. In accordance with Section 10.3.5.1 of the Delaware Sediment and Stormwater Regulations, Green Technology BMPs must be given first consideration for stormwater quality management. The conceptual plan submitted with the application shows a large pond and

it appears that the site has been designed using a "collect and convey" approach to stormwater management which is not in keeping with the Green Technology BMP approach where runoff is treated closer to the source. Larger islands could be incorporated into the parking lot layout to facilitate the use of bioretention. Each stormwater management facility should have an adequate outlet for release of stormwater.

- Contact Elaine Webb at DNREC to schedule a preliminary meeting to discuss the sediment and erosion control and stormwater management components of the plan as soon as possible. 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.
- **Air Quality.** The applicant shall comply with all applicable Delaware air quality regulations. These regulations include:

**Regulation 1106 - Particulate Emissions from Construction and Materials Handling**

- Use dust suppressants and measures to prevent transport of dust off-site from material stockpile, material movement and use of unpaved roads.
- Use covers on trucks that transport material to and from site to prevent visible emissions.

**Regulation 1113 - Open Burning**

- Prohibits open burns statewide during the Ozone Season from May 1-Sept. 30 each year.
- Prohibits the burning of land clearing debris, trash or building materials/debris.

**Regulation 1141 – Limiting Emissions of Volatile Organic Compounds From Consumer and Commercial Products**

- Restricts the use of certain coatings and consumer products in typical architectural applications.

**Regulation 1145 - Excessive Idling of Heavy Duty Vehicles**

- Restricts idling time for trucks and buses having a gross vehicle weight of over 8,500 pounds to no more than three minutes.

- **Hazardous Waste Sites.** If it is determined by the Department that there was a release of a hazardous substance on the property in question, it is suggested that the guidelines and provisions of 7 Del.C. Chapter 91, Delaware Hazardous Substance Cleanup Act and the Delaware *Regulations Governing Hazardous Substance Cleanup* be followed.
- **Tank Management Branch.** If a release of a Regulated Substance occurs at the proposed project site, compliance of 7 Del.C. Chapter 60, 7 Del.C., Chapter 74 and DE

Admin. Code 1351, State of Delaware *Regulations Governing Underground Storage Tank Systems* (the UST Regulations) is required.

- There is one LUST project located within the boundaries of the project parcel:
  - Donald Carey Residence, Facility: 1-000754, Project: K0709084 (Inactive)
- There is one LUST project located within a quarter mile of the project parcel:
  - Wawa Food Market #855, Facility: 1-000720, Project: K0503024 (Inactive)
- Per the **UST Regulations: Part E, § 1. Reporting Requirements:**
  - “Any indication of a Release of a Regulated Substance that is discovered by any Person, including but not limited to environmental consultants, contractors, utility companies, financial institutions, real estate transfer companies, UST Owners or Operators, or Responsible Parties shall be reported within 24 hours to:
    - The Department’s 24-hour Release Hot Line by calling 800-662-8802; and
    - The DNREC, Tank Management Branch by calling 302-395-2500.”

Delaware Department of Education – Contact John Marinucci 735-4199

- The Capital School District has already initiated the approval of land acquisition letter as required by 29 Del. C. § 7525 – no further DOE State Regulatory Issues remain regarding the site plan.

### **Recommendations/Additional Information**

This section includes a list of site specific suggestions that are intended to enhance the project. These suggestions have been generated by the State Agencies based on their expertise and subject area knowledge. **These suggestions do not represent State code requirements.** They are offered here in order to provide proactive ideas to help the applicant enhance the site design, and it is hoped (**but in no way required**) that the applicant will open a dialogue with the relevant agencies to discuss how these suggestions can benefit the project.

- There are approximately 1,000 dwelling units adjacent to and just south of the school site. The District is to be commended for proposing a bicycle/pedestrian connection, although one can assume that not every student will walk and/or bike to school. Without a direct road connection, however, anyone driving from the development adjacent to the school would be required to drive an additional 2-3 miles, making a series of left turns on roads that already experience traffic congestion. This creates safety (student drivers, congested roads, and left turns) and air quality (longer trips equal more air emissions) issues. There are two stub streets to the school property, and the western-most stub could provide an interconnection point. The issues of site access, internal circulation, interconnections to

the neighborhoods and the regional roadway network, and safety will require further collaboration between the District, DOE, DelDOT, the City and other stakeholders. See additional details below in the DelDOT and DOE comments.

The Office of State Planning Coordination looks forward to assisting these stakeholders by coordinating State agency responses and activities to ensure a timely resolution of these varied, yet interconnected issues.

Department of Transportation – Contact Bill Brockenbrough 760-2109

- The Dover/Kent Metropolitan Planning Organization’s March 2008 Route 8 Concept Plan and Operations Study identified a need for a north-south connector road between Route 8 and Hazletville Road. The plan for the high school presented for review as a part of the PLUS application provides a right-of-way for a street to be named Runner Row along the west edge of the site. That street could be the north end of that connector road. Appropriately, the street is proposed to include access to the proposed Leander Lakes Apartments. However, that right-of-way continues south as the street turns east into the internal roads around the football stadium, and the connection to Tribbitt Street (Village of Westover) is into that system. That is not acceptable. At the PLUS meeting the applicants presented a revised version of the site plan in which Runner Row is redesigned in a way that could be utilized as the regional road. This is a step in the right direction, but more work needs to be done on the design of this roadway and its connection to adjacent properties and the regional roadway network. DelDOT anticipates recommending to the City of Dover that they require a design that can, at some point, be part of a State or locally maintained road in a dedicated right-of-way from Forrest Avenue to Hazletville Road.
- As a result of discussions at the PLUS meeting and the subsequent meeting held on September 10<sup>th</sup> DelDOT acknowledges that the District has the following concerns, which DelDOT will take into account as they continue to meet with the District to come to consensus on this site plan:
  - The District is still negotiating with the developers of the Leander Lakes Apartments and may not wish to dedicate the Runner Row right-of-way yet.
  - The District would like to avoid a permanent vehicular connection between Tribbitt Street and Runner Row.
  - The security of the high school campus is of great concern to the District.
- DelDOT will likely need to take an active role in securing the rights-of-way for extension of the road from the school property to Hazletville Road and possibly in constructing the road in that right-of-way. However, DelDOT still looks for the District to do its part in implementing the connector road discussed in the Route 8 Study as a means of mitigating the traffic that the school will generate. DelDOT looks forward to working with the District in this regard.

- School District’s site engineer should coordinate the design of Runner Row with the engineer of the Leander Lake Apartments.
- DelDOT appreciates that the District and their engineer have had a pre-submittal meeting with Mr. Seneus and the DelDOT Subdivision Engineer, Mr. Marc Cote’. Significant points from that meeting are as follows:
  - Signal agreements for the east entrance and the west entrance (Route 8 / Runner Row intersection) will be required for possible signalization.
  - The west access point (Route 8 / Runner Row intersection) is to be a full intersection to be jointly used with the Leander Lakes development, and as discussed above, other future traffic. The intersection design should reflect all anticipated future traffic.

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

- **More information on TMDLs.** A pollution control strategy (PCS) is the regulatory directive requiring the implementation of various management practices (BMPs) that help reduce transport of nutrient and bacterial pollutant runoff to waters draining into a “greater” common watershed; with the ultimate objective of achieving the obligatory TMDL reduction requirements for that watershed. However, the PCS for the St. Jones watershed has not been formally completed to date. In absence of a finalized PCS, the applicant is strongly urged to reduce nutrient and bacterial pollutants through the voluntary commitment to the implementation of BMPs, such as maximizing open space by establishing more tree cover on this parcel than currently proposed.
- DNREC strongly encourages the applicant to voluntarily assess nutrient and bacterial pollutant loading at the preliminary project design phase. To this end the Watershed Assessment Section has developed a methodology known as the “Nutrient Load Assessment protocol.” The protocol is a tool used to assess changes in nutrient loading (e.g., nitrogen and phosphorus) that result from the conversion of individual or combined land parcels to a different land use(s), while providing applicants with quantitative information about their project’s impact(s) on baseline water quality. DNREC also strongly encourages the applicant/developer to use this protocol to help them design and implement the most effective BMPs. Please contact Lyle Jones at 302-739-9939 for more information on the protocol.
- **Soils Assessment.** DNREC suggests the applicant avoid the area containing the poorly-drained wetland associated (hydric) Fallsington soil mapping unit (FgA; see figure 1).

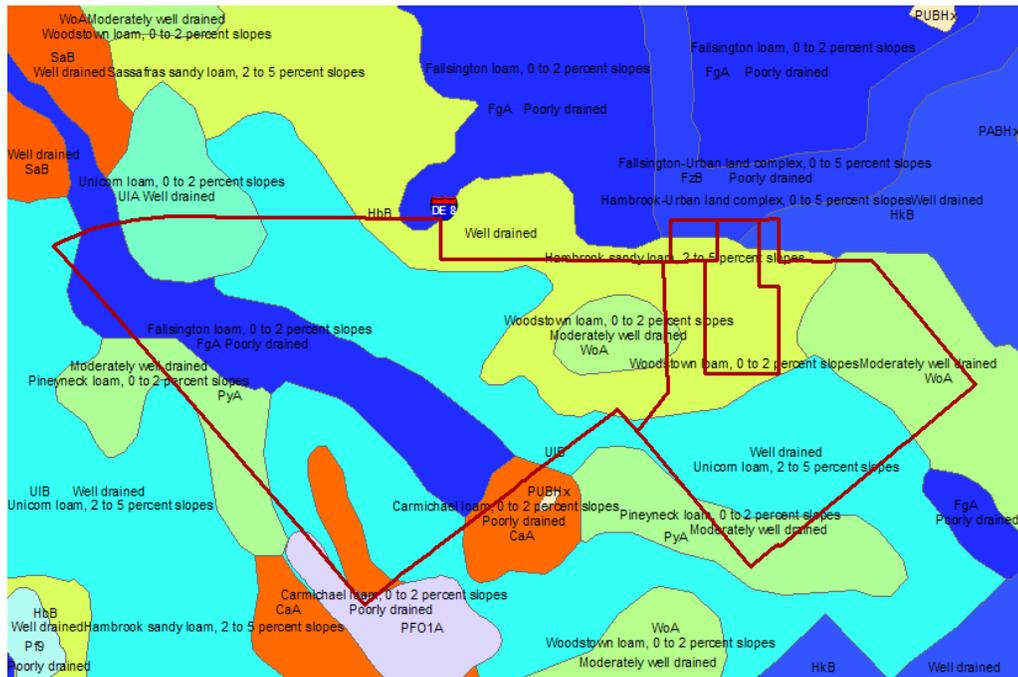


Figure 1: Soil mapping in the immediate vicinity of the proposed project

- Impervious Surfaces and Best Management Practices.** DNREC strongly recommends that the applicant calculate post-construction surface imperviousness with all forms of created surface imperviousness (e.g., rooftops, driveways, parking lots, sidewalks, athletic fields (i.e., football, baseball, soccer, lacrosse, tennis...etc.) open-water storm water management structures and roads) included in the calculation. Studies have shown athletic fields often have levels of compaction and runoff that approach that of concrete pavement (*The Compaction of Urban Soils*, Technical Note #107 from Watershed Protection Techniques. 3(2):661-665).

Since the project (as currently proposed) will render much of this parcel's land cover largely impervious while increasing the probability of nutrient pollutant runoff impacts – DNREC strongly encourages the applicant be proactive and implement BMPs such as rain gardens and green-technology storm water management structures as mitigative measures to reduce such impacts. They further encourage the use of pervious paving materials (instead of conventional asphalt and concrete) to mitigate impacts from surface imperviousness, especially in those areas containing paved parking lots. Moreover, they also encourage the replacement of existing paved surfaces with pervious paving materials wherever practicable.

- Drainage Program.** The Drainage Program requests 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 onsite stormwater. Notify downstream landowners of the change in volume of water released on them.

- **More information on air quality.** Measures may be taken to substantially reduce the air quality emissions and include:
  - **Construct only energy efficient buildings.** Energy Star qualified buildings are up to 30% more energy efficient. These savings come from building envelope upgrades, high performance windows, controlled air infiltration, upgraded heating and air conditioning systems, tight duct systems and upgraded water-heating equipment. Every percentage of increased energy efficiency translates into a percent reduction in pollution.
  - **Offer geothermal and/or photo voltaic energy options.** These systems can significantly reduce emissions from electrical generation, and from the use of oil or gas heating equipment.
  - **Provide tie-ins to the nearest bike paths and links to any nearby mass transport system.** For every vehicle trip that is replaced by someone using a sidewalk, bike path or mass transit can significantly reduce mobile source emissions.
- Additionally, the following measures will reduce emissions associated with the actual construction phase of the development:
  - **Use retrofitted diesel engines during construction.** This includes equipment that is on-site as well as equipment used to transport materials to and from site.
  - **Use pre-painted/pre-coated flooring, cabinets, fencing, etc.** These measures can significantly reduce the emission of VOCs from typical architectural coating operations.
  - **Plant low VOC emitting trees at residential units and in vegetative buffer areas.** Trees on the list below reduce emissions by trapping dust particles and by replenishing oxygen. Trees also reduce energy emissions by cooling during the summer and by providing wind breaks in the winter, whereby reducing air conditioning needs by up to 30 percent and saving 20 to 50 percent on fuel costs.
- **More information on hazardous waste sites.** SIRB strongly recommends that the land owner perform environmental due diligence of the property by performing a Phase I Assessment in accordance to Section 9105(c) (2) of the Delaware Hazardous Substance Cleanup Act (HSCA). While this is not a requirement under HSCA, it is good business practice and failure to do so will prevent a person from being able to qualify for a potential affirmative defense under Section 9105(c) (2) of HSCA.

Should a 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 and DNREC should be notified at the 24-hour emergency number (800-662-8802). SIRB should also be contacted as soon as possible at 302-395-2600 for further instructions.

- **More information on tank management.** When contamination is encountered, PVC pipe materials should be replaced with ductile steel and nitrile rubber gaskets in the contaminated areas.

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

Delaware Department of Education – Contact John Marinucci 735-4199

- The DOE has already commented on the site acquisition and location of a high school on this property.
- The DOE supports this site and will continue to work with the district, architect, site engineer, City of Dover and various state agencies regarding the site plan as it develops. The DOE reserves the right to provide continued and on-going comments and input as the site plan develops.
  - The Capital School District has engaged the stakeholders and interested parties/jurisdictions in their planning of the development of the site. Continued stakeholder involvement is suggested as the site plan develops.
  - The DOE recommends and supports pedestrian access to the neighboring developments – such as Cannon Mills and/or Westover.
  - The DOE will continue to work with the School District, the City of Dover, the MPO, DelDOT and other interested parties to achieve a mutually agreeable solution to site access concerns and the more global North/South connection issue.

Department of Agriculture – Contact Scott Blaier 698-4529

- The Delaware Department of Agriculture Forest Service encourages the school district to use the “Right Tree for the Right Place” for any design considerations. This concept allows for the proper placement of trees to reduce heating and cooling costs. 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.

- 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.

**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,



Constance C. Holland, AICP

Director, Office of State Planning Coordination

CC: City of Dover