



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

February 21, 2011

Tim Anderson  
17 Polly Drummond Circle  
Newark, DE 19711

RE: PLUS 2011-01-04; Telegraph Road Pharmacy

Dear Mr. Anderson:

Thank you for meeting with State agency planners on January 26, 2011 to discuss the proposed plans for the Telegraph Road Pharmacy to be located at 541 Main Street near Wilmington.

According to the information received, you are seeking a rezoning of 1.724 acres from NC 6.5 & CN to CN for a 13,540 sq. ft. pharmacy.

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 New Castle County is the governing authority over this land, the developers will need to comply with any and all regulations/restrictions set forth by the County.**

**Strategies for State Policies and Spending**

This parcel is located in a Level 1 area according to the Strategies for State Policies and Spending. Investment Level 1 reflects areas that are already developed in an urban or suburban fashion, where infrastructure is existing or readily available, and where future redevelopment or infill projects are expected and encouraged by State policy.

### **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 National Register listed property on this parcel (property); however, there is a couple nearby such as the following: a 20th-century School, the Stanton Meeting House (N01474) and another architectural structure associated with the Calvary Bible Presbyterian Church (N00200). The USGS Topographic Map of 1906 shows some type of structure or dwelling nearby, approximately in the same location of the Stanton Meeting House (N01474) and the building associated with the Calvary Bible Presbyterian Church (N00200). Such 19th-century dwellings and churches may have a cemetery associated with them. If there is a cemetery, it is possible that there may be burials within this parcel as well. With this in mind, it is important that the developer be aware of the Delaware Unmarked Human Remains Act of 1987, outlined in Chapter 54 of Title 7 of the Delaware Code, which pertains to the discovery and disposition of such remains, because the unexpected discovery of unmarked human remains during construction can result in significant delays while the process is carried out.

Prior to any demolition or ground-disturbing activities, the developer should consider hiring an archaeological consultant to examine the parcel for archaeological sites, such as 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 any known or potential culture or historic resources.

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

- The site access and subdivision streets must be designed in accordance with DeIDOT'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).
- As proposed, DeIDOT would expect the subject development to generate about 1,192 vehicles per day and about 140 vehicles per hour during the peak hour. As such, it would meet DeIDOT's volume warrants for a Traffic Impact Study (TIS), as contained in Section 2.3.1 of the Standards and Regulations (400 vehicles per day and 50 vehicles per hour during the peak hour. DeIDOT believes it would also meet New Castle County's warrants for such a study. However, they see that the plan is characterized as a redevelopment plan, which would exempt it from the County's requirement of a TIS. At a pre-submittal meeting on May 11, 2010, they agreed that the requirement of a TIS or Traffic Operational Analysis (TOA) for this project would be at the discretion of New

Castle County. If the developer would like to proceed with a TIS or TOA, they should contact Mr. Troy Brestel of our Development Coordination Section to arrange for a scoping meeting. Mr. Brestel may be reached at (302) 760-2167.

- In accordance with Section 5.2 of the Standards and Regulations, DelDOT anticipates requiring improvements along the site frontage on Telegraph Road (New Castle Road 338). Those improvements could, in turn, require the dedication of rights-of-way to public use. Because Telegraph Road is classified as a collector road, the proposed by-pass lane is not acceptable. Where by-pass lane warrants are met on collector and arterial roads, left-turn lanes are required. However, as discussed at pre-submittal meeting mentioned above, the by-pass lane is only marginally warranted. DelDOT recommends that the developer's site engineer contact the Subdivision Manager for northwestern New Castle County, Mr. Joshua Schwartz, to discuss this requirement further as they develop the entrance plan. Mr. Schwartz may be reached at (302) 760-2768.
- In accordance with Section 3.5.7.4 of the Standards and Regulations, and as discussed at pre-submittal meeting mentioned above, DelDOT anticipates cross-access easements between this property and the adjoining property on Delaware Route 4. When that adjoining property is redeveloped, we anticipate requiring the developer of that property to relocate the right turn entrance and exit presently proposed to a point further east, on the frontage of that property.
- DelDOT anticipates that New Castle County will require a "Letter of No Objection" from the Department for this project. Per Section 3.4 of the Standards and Regulations, 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. Please make all submissions to Mr. Joshua Schwartz, Subdivision Manager.
- As specified in Section 4.1 of the Standards and Regulations, 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. Please make all submissions to Mr. Joshua Schwartz, Subdivision Manager.
- In accordance with Section 3.5.5.1 of the Standards and Regulations, the existing bus stop on the site's Route 4 frontage should be upgraded to a 9-foot by 12-foot concrete pad attached to the sidewalk about 40 feet north of the current stop location. The developer may contact Delaware Transit Corporation's Service Development Planner for suburban New Castle County, Mr. Ivan Mitchell, for more information in this regard. Mr. Mitchell may be reached at (302) 576-6062.

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

## **TMDLs**

- Total Maximum Daily Loads (TMDLs) for nitrogen and phosphorus have been promulgated through regulation for the Christina River 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 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 land use practices that support these desired use goals. The project is located in the greater Piedmont drainage, specifically within the Christina River watershed. In the Christina River watershed, post-development nitrogen and phosphorus loading must be capped at the pre-development or baseline loading rate (or a 0% post-construction increase in N & P in Delaware’s portion of the Christina River Basin) to meet the required TMDL for each nutrient. Moreover, bacteria must be reduced by 89.44% to meet the required TMDL. The specific required nutrient and bacterial requirements and background information is in the report entitled “*Christina River Basin High-Flow TMDL*” by the EPA. This report can be retrieved from the following web link:

[http://www.epa.gov/reg3wapd/tmdl/pa\\_tmdl/ChristinaMeetingTMDL/index.htm](http://www.epa.gov/reg3wapd/tmdl/pa_tmdl/ChristinaMeetingTMDL/index.htm)

## **Water Supply**

- The project information sheets state water will be provided to the project by Artesian Water Company via a public water system. Our records indicate that the project is located within the public water service area granted to Artesian Water Company under Certificate of Public Convenience and Necessity 85-WS-03.
- 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.

- Potential Contamination Sources exist in the area, and any well permit applications will undergo a detailed review that may increase turnaround time and may require site specific conditions/recommendations. In this case there are two Underground Storage Tanks associated with Exxon #28446 and Red Clay School Facilities Center, and a Solid Waste Landfill (Timko/Petrinol) located within 1000 feet of the proposed project.

### **Water Resource Protection Areas**

- The parcel falls entirely within a Level 2 Source Water Protection Area for New Castle County. Level 2 Source Water Protection Areas are the delineated watershed upstream from a surface water intake that supplies water to a drinking water system. Land Use or Land Activity within this area has the potential to influence water quality or quantity to the system.

### **Sediment and Stormwater Program**

- 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 project 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 County Department of Land Use Engineering Section. Contact the Department of Land Use at (302) 395-5470 for details regarding submittal requirements and fees (Delaware Code, Title 7, Chapter 40; Delaware Regulations, Administrative Code, Title 7, 5101).

### **Hazardous Waste Sites**

- If it is determined by the Department that there was a release of a hazardous substance on the property in question and the Department requires remediation pursuant to the Hazardous Substance Cleanup Act, the provisions of 7 Del.C. Chapter 91, Delaware Hazardous Substance Cleanup Act and the Delaware *Regulations Governing Hazardous Substance Cleanup* shall be followed.”
- There are two SIRB site found within a ½-mile radius of the proposed project:
  - United Water Company (DE-0195) is located 0.32 miles south of the project area. The water plant would collect water from the Red and White Clay Creek to be treated for drinking water. The water was mixed with solutions to remove any harmful materials and transferred into settling systems. The settled material was then pumped into lagoons. Once the lagoons were full, the settled material was dried, fixed with

fill soil and used in construction. The site was given a No Further Action designation in 2009.

- Timko Brothers Landfill (DE-0055) is located 0.06 miles south of the project area. The landfill was in operation from 1955-1985, excepting demolition and construction debris. In the 1970s, house hold debris was placed on the site; however, fire burned much of the material. The site is currently heavily covered with vegetation and was given a No Further Action designation in 2009.

**Tank Management Branch.** Please be aware:

- 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 (1) inactive LUST project located within the project parcel:

Rock Bottom Stone and Landscape, Facility: 9-000149, Project: N1010091 (Inactive)

- October 2010—Phase II site assessment report indicated a gasoline retailer used to be located on the parcel, but there is no record in TMB files. Soil and groundwater samples were collected at locations of previously removed heating oil UST at residence and from suspected area where retail UST system was located. Upon review of the results, the contamination appeared to be localized mainly at former heating oil UST location, and a conditional No Further Action letter was issued. Any on-site disturbance of soil will require a contaminated materials management plan (CMMP). Please contact Chris Brown of the DNREC-TMB with any questions regarding the above (302-395-2500).
- In addition, there are four (5) LUST project facilities located within a quarter mile of the project site. Please see below for project status:
  - Red Clay School Facilities Center, Facility: 3-000887, Project: N9905111 (Inactive)
  - St Marks United Methodist, Facility: 3-001121, Project: N9303057 (Inactive)
  - Super Soda Center (Stanton), Facility: 3-000212, Project: N0011131, N0907061, N9704055 (Inactive)
  - SMO #295, Facility: 3-000350, Project: N0606063, N8401001 (Inactive) N0911091 (Active)
  - Bouden Buses Inc, Facility: 3-001805, Project: N9708125 (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.”

### Air Quality

- The applicant shall comply with all applicable Delaware air quality regulations. Please note that the following regulations in Table 1 – Potential Regulatory Requirements may apply:

<b>Table 1: Potential Regulatory Requirements</b>	
<b>Regulation</b>	<b>Requirements</b>
<b>7 DE Admin. Code 1106</b> - Particulate Emissions from Construction and Materials Handling	<ul style="list-style-type: none"> <li>• Use dust suppressants and measures to prevent transport of dust off-site from material stockpile, material movement and use of unpaved roads.</li> <li>• Use covers on trucks that transport material to and from site to prevent visible emissions.</li> </ul>
<b>7 DE Admin. Code 1113</b> – Open Burning	<ul style="list-style-type: none"> <li>• Prohibit open burns statewide during the Ozone Season from May 1-Sept. 30 each year.</li> <li>• Prohibit the burning of land clearing debris.</li> <li>• Prohibit the burning of trash or building materials/debris.</li> </ul>
<b>7 DE Admin. Code 1135</b> – Conformity of General Federal Actions to the State Implementation Plan	<ul style="list-style-type: none"> <li>• Require, for any “federal action,” a conformity determination for each pollutant where the total of direct and indirect emissions would equal or exceed any of the de minimus levels (See Section 3.2.1)</li> </ul>
<b>7 DE Admin. Code 1141</b> – Limiting Emissions of Volatile Organic Compounds from Consumer and Commercial Products	<ul style="list-style-type: none"> <li>• Use structural/ paint coatings that are low in Volatile Organic Compounds.</li> <li>• Use covers on paint containers when paint containers are not in use.</li> </ul>
<b>7 DE Admin. Code 1144</b> – Control of Stationary	<ul style="list-style-type: none"> <li>• Ensure that emissions of nitrogen oxides (NO<sub>x</sub>), non-methane hydrocarbons (NMHC),</li> </ul>

Generator Emissions	particulate matter (PM), sulfur dioxide (SO <sub>2</sub> ), carbon monoxide (CO), and carbon dioxide (CO <sub>2</sub> ) from emergency generators meet the emissions limits established. (See section 3.2). <ul style="list-style-type: none"> <li>• Maintain recordkeeping and reporting requirements.</li> </ul>
<b>7 DE Admin. Code 1145</b> – Excessive Idling of Heavy Duty Vehicles	<ul style="list-style-type: none"> <li>• Restrict idling time for trucks and buses having a gross vehicle weight of over 8,500 pounds to no more than three minutes.</li> </ul>

For a complete listing of all Delaware applicable regulations, please look at our website: <http://www.awm.delaware.gov/AQM/Pages/AirRegulations.aspx>.

Delaware State Fire Marshall's Office – Contact Duane Fox 739-4394

At the time of formal submittal, the applicant shall provide; completed application, fee, and three sets of plans depicting the following in accordance with the Delaware State Fire Prevention Regulation (DSFPR):

### **Fire Protection Water Requirements**

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

### **Fire Protection Features**

- All structures over 10,000 Sq. Ft. aggregate will require automatic sprinkler protection installed. Show Fire Department Connection location (must be within 300 feet of fire hydrant), and detail as shown in the DSFPR
- Buildings greater than 10,000 sqft, 3-stories or more, over 35 feet, or classified as High Hazard, are required to meet fire lane marking requirements Show Fire Lanes and Sign Detail as shown in Delaware State Fire Prevention Regulations.

### **Accessibility**

- All premises, which the fire department may be called upon to protect in case of fire, and which are not readily accessible from public roads, shall be provided with suitable gates and access roads, and fire lanes so that all buildings on the premises are accessible to fire

apparatus. This means that the access to the site from the public streets must be constructed so fire department apparatus may negotiate it.

- Fire department access shall be provided in such a manner so that fire apparatus will be able to locate within 100 ft. of the front door.
- The use of speed bumps or other methods of traffic speed reduction must be in accordance with Department of Transportation requirements.
- The local Fire Chief, prior to any submission to our Agency, shall approve in writing the use of gates that limit fire department access into and out of the development or property.

### **Gas Piping and System Information:**

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

### **Required Notes**

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

### **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.

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

- Since there are a couple of known cultural and historic resources nearby, such as the 20th-century School, the Stanton Meeting House (N01474) and the building associated with the Calvary Bible Presbyterian Church (N00200), the developer may want to consider putting a landscape barrier between these cultural and historic resources and the proposed commercial development, in order to block any adverse noise or visual effects that may affect them.

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

#### **Additional information on TMDLs.**

- A pollution control strategy (PCS) is the regulatory directive requiring the implementation of various best management practices (BMPs) that help reduce transport of nutrient and bacterial pollutant runoff from all 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 Christina River 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 voluntary commitment to the implementation of the following recommended BMPs:
  - The developer should maintain the recommended 100-foot buffer width from all delineated wetlands (USACE approved wetland delineations) and water bodies.
  - The applicant should maximize the amount and/or preservation of passive wooded open space.
  - The applicant should calculate post-construction surface imperviousness with all forms of created (or constructed) surface imperviousness (e.g., rooftops, driveways, parking lots, sidewalks, open-water storm water management structures, and roads) included in the calculation.
  - Since this is a commercial project that will likely generate large amounts of impervious cover, we encourage the use of pervious paving materials (instead of

- conventional asphalt and concrete) as a BMP to reduce the impacts associated with surface imperviousness, wherever practicable.
- We strongly recommend the use of rain gardens, and green-technology storm water management structures (in lieu of open-water management structures) as BMPs to mitigate or reduce nutrient and bacterial pollutant impacts via runoff from impervious surfaces.
  - The applicant should 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. We strongly encourage the applicant/developer 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.

#### **Additional 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.

#### **Additional 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.

**Additional information on air quality**

- Businesses may emit, or cause to be emitted, air contaminants into Delaware’s air, which will negatively impact public health, safety and welfare. These negative impacts are attributable to:
  - Emissions that form ozone and fine particulate matter; two pollutants relative to which Delaware currently violates federal health-based air quality standards,
  - The emission of greenhouse gases which are associated with climate change, and
  - The emission of air toxics.
  
- Air emissions generated from new homes include emissions from the following activities:
  - Area sources such as painting, maintenance equipment and the use of consumer products like roof coatings and roof primers.
  - The generation of electricity needed to support your business, and
  - Car and truck activity associated with a new business.
  
- The area and electric power generation emission components for this project could not be quantified, however, based on daily trip data presented and data taken from the ITE Trip Generation Manual, 8<sup>th</sup> Edition, the mobile air emissions were quantified in Table 2 and represent the actual impact the Telegraph Road Pharmacy may have.

<b>Table 2: Projected Air Emissions</b>		
Emissions Attributable to Telegraph Road Pharmacy (Tons per Year)	Volatile Organic Compounds (VOC)	Nitrogen Oxides (NOx)
Mobile Emissions	3.95	5.21

Note that emissions associated with the actual construction of the pharmacy, including automobile and truck traffic from working in, or delivering products to the site, as well as site preparation, earth moving activities, road paving and other miscellaneous air emissions, are not reflected.

- Measures may be taken to substantially reduce the air emissions. These measures include:
  - **Constructing with only energy efficient products.** Energy Star qualified products are up to 30% more energy efficient. 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. The Energy Star Program is excellent way to save on energy costs and reduce air pollution.
- **Offering 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.
  - **Providing tie-ins to the nearest bike paths and links to any nearby mass transport system.** These measures can significantly reduce mobile source emissions.
- Additionally, the following mitigation measures will reduce emissions associated with the actual construction phase of the project:
    - **Using retrofitted diesel engines during construction.** This includes equipment that are on-site as well as equipment used to transport materials to and from site.
    - **Using pre-painted/pre-coated flooring, cabinets, fencing, etc.** These measures can significantly reduce the emission of VOCs from typical architectural coating operations.
    - **Planting trees at residential units and in vegetative buffer areas.** Trees 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.

This is a partial list, and there are additional things that can be done to reduce the impact of the pharmacy. The applicant should submit a plan to the DAQ which address the above listed measures, and that details all of the specific mitigation measures that will be incorporated into the Telegraph Road Pharmacy.

Delaware State Fire Marshall's Office – Contact Duane Fox 739-4394

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

**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". The signature is written in black ink and is positioned above the printed name and title.

Constance C. Holland, AICP

Director, Office of State Planning Coordination

CC: New Castle County