



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

May 22, 2013

Ms. Teresa Tieman
City of Harrington
106 Dorman Street
Harrington, DE 19952

RE: 2013-04-04; City of Harrington Comprehensive Plan Update

Dear Ms. Tieman:

Thank you for meeting with State agency planners on April 24, 2013 to discuss the proposed City of Harrington draft comprehensive plan update. .

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.

Overall, congratulations on completing your comprehensive plan. It shows a great deal of community pride and the efforts of many community members. This plan provides a vision for the City and is a platform for implementation of the many projects and studies detailed in the plan. Harrington deserves special recognition for including Chapter 14, "Healthy Community" in the plan. This is the first comprehensive plan in Delaware to do so, and Harrington should be commended. The importance of good planning to improve the quality of life and health of citizens is becoming increasingly well known. The comprehensive plan addresses many of the goals articulated in the Healthy Community chapter.

Certification Comments: These comments must be addressed in order for our office to consider the plan amendment consistent with the terms of your certification and the requirements of Title 22, § 702 of the Del. Code.

- **General Comment:** Each functional element of the plan (Housing, Transportation, Environmental etc.) should be summarized at the end of the chapter with implementation recommendations. As written, the various chapters seem to be mostly informational in nature or documenting current conditions. What is the plan? Some chapters, such as Transportation, include "goals" at the end which serve this purpose. Please make sure all of the functional elements have similar summaries.

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- Chapter 4, Page 2 – The population projections should reference the most current version of the Delaware Population Consortium projections, Version 2012.0. These should correspond to the projections referenced in Chapter 10, Page 3.
- Chapter 4, Page 5 – the plan indicates that the water system has limited capacity, and that if growth occurs more quickly than is anticipated there will be no capacity. What is the plan to increase capacity if this occurs? Conversely, what is the plan to limit new development if water system capacity cannot be increased?
- Chapter 4, Pages 5 – 6 – The wastewater plan has no discussion of capacity. What is the capacity of the system? Are there any limitations in the current in-town collection system, or in the force main that transmits waste to the County? What is the nature of the agreement with Kent County to treat the wastewater transmitted to them? Is there adequate capacity available to accommodate anticipated growth?
- Chapter 6, Page 6 – the pie chart on the page is not correct. The “population 25 years and over” is the universe of all residents for whom educational attainment is calculated. It should not show up on the pie chart. The legend is incomplete as well. Please correct the pie chart. Also, the pie chart is placed out of context and is not accompanied by any description or analysis. What is the purpose of the chart? How does it relate to the listing of educational facilities that precede it?
- Chapter 7, Page 3 – Sourcewater Protection is a requirement of Delaware Code. Please revise the plan as described in DNREC’s detailed comments, listed below:

Source Water Protection

- Chapter 7 of the Plan includes a discussion of the City’s Source Water Assessment for the public water system. This assessment is provided to public water systems as required by 7 Del. C. 6083. DNREC recognizes the City’s efforts in developing and adopting a source water protection ordinance; however, there is neither discussion nor reference to the ordinance in the comprehensive plan. In addition, excellent groundwater recharge potential areas are shown on the map (Exhibit 6 of Plan) while wellhead protection areas are not. These elements are required.
- The comprehensive Plan must contain the following elements per the Memorandum of Understanding between the Office of State Planning and Division of Water dated July 2011.
- Counties and Municipalities Over 2,000 Population (as reported in the most recent decennial Census):

- Text of the comprehensive plan must include description of source water requirements in 7 Del. C. 6082(b), and include goals and objectives related to the protection of the resource. This text shall be placed within the water and sewer element of the local government’s comprehensive plan, as prescribed by Title 9 or Title 22 of the Delaware Code.
- A map of source water resources (excellent recharge areas, wellhead protection areas) shall be included in the plan. This map must be derived from the most current source water protection datasets¹ provided by the Department of Natural Resources and Environmental Control (DNREC).
- The map and plan text must clearly include the note that the regulatory provisions of any source water ordinance will refer to the most current source water protection datasets¹.
- The local government shall adopt, after consultation with DNREC, an ordinance that is protective of the resource. The ordinance shall refer to the most current official source water map and relevant data, as provided in the current Comprehensive Plan and as amended from time to time or include a map update procedure.
- **Sourcewater Requirement:** Move the section on source water protection, including a discussion of the City’s source water protection ordinance, from Chapter 7, Environmental Protection, to Chapter 4, City Utilities.
- **Sourcewater Requirement:** Add wellhead protection areas to Exhibit 6, Source Water Map.
- Chapter 8, Page 7 – the paragraph at the top of the page indicates that the City will consider land use changes on a “case-by-case basis.” Please note that any such land use change will require a comprehensive plan amendment. Revise the text to clearly indicate this. Land use changes and comp plan amendments should be an exception, and only when the proposal is particularly beneficial to the City. Otherwise, the plan should be used to guide growth and development.
- Exhibit 17 – it is difficult to tell the difference between the colors for low density residential and medium density residential. Please select colors that clearly show the distinction between the two land uses.
- Chapter 8, Pages 13 and 14 and Exhibit 26 – the text indicates that two new mixed use zoning districts are proposed. I recommend that you amend Exhibit 26 (the table relating land uses to zoning districts) to indicate that new zoning districts may be added in the mixed use land use category. A general note may be advisable in case the City wishes to add other zoning districts in the future.

- Chapter 8, Page 15 and Exhibit 26 – It is not clear whether the City currently has an Industrial zoning district or not. In any event, the Industrial land use and current (or future) zoning district need to be added to Exhibit 26.

Recommendations: Our office strongly recommends that the Town consider these recommendations from the various State agencies as you review your plan for final approval.

This office has received the following comments from State agencies:

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

- General Comment: Chapter 15, Implementation provides a good roadmap for achieving the many implementation items in the plan.
- Chapter 3, Page 2 – the heading “Community Design” is misleading because the paragraph does not have anything to do with community design. I suggest picking another heading.
- Chapter 8, Page 5 and Exhibit 15 – A number of the annexation areas exclude single lots. This ensures the creation of enclaves. Please consider revising the annexation maps to ensure consistent town boundaries in order to avoid the creation of enclaves.
- Chapter 8, Page 5 and Exhibit 15 – This annexation plan contains an increase in proposed annexation areas compared to the 2004 plan and 2008 plan amendment. A review of Exhibit 15 indicates that an additional 50 parcels totaling 511 acres are proposed for annexation (see attached map). The annexation plan text makes no mention of these additional annexations. The plan should discuss why these additional areas were included in the annexation plan. It is recommended that the City evaluate whether or not there is adequate infrastructure and public services available to accommodate these annexation areas in addition to the in-town areas and areas already identified for annexation. The plan should be amended to include discussion of this issue, and any plan goals or recommendations that are appropriate.
- Chapter 8, Page 17 – add a heading for the section on Master Plans. This short section is out of context, and only informational in nature. Are there any areas in Harrington that might be candidates for a Master Plan? The industrial area was mentioned earlier. Please indicate if the City is interested in a Master Plan or Plans.
- Chapter 8, Page 18 and Exhibit 18 – It is recommended that the plan clearly state that the zoning map presented as Exhibit 18 is the “Existing Zoning Map” used for planning purposes. This section of text should make it clear that the “Official Zoning Map” is available from the City. It is recommended that you discuss the ramifications of placing a zoning map in the plan with your City Solicitor.

- Chapter 9, Page 14 – the last goal is to “clearly define an area to be designated as downtown commercial.” The plan does so on Chapter 8, Pages 8-9 and on Exhibit 17. So, has this goal been accomplished? Or does the City wish to designate a different area? Now is the time to do so in order to avoid the need for a comprehensive plan amendment.
- Chapter 11, Page 2 – It would be helpful to list by name the streets you wish to have DelDOT clarify ownership of.
- Chapter 11, Page 7 – At the top of the page there is a discussion about economic development focused on agricultural industries that could be linked to rail transportation. This concept is a good economic development strategy that could be mentioned and expanded upon in Chapter 9, Economic Development and Redevelopment. Perhaps this is another candidate for a Master Plan?
- Chapter 15, Pages 2 – 3 – The implementation plan schedules the various environmental regulations suggested by Chapter 7 for the intermediate term (3-5 years). It is suggested that many of these changes could be incorporated into the Chapter 440 Zoning re-write that is scheduled for immediate implementation. In fact, in order to comply with the Sourcewater Requirements (a code requirement and certification item) some changes may have to be made in the very short term.

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

- Harrington is rightly proud of its history and character as a railroad town. The plan includes a brief history and postcard illustrations of the older parts of the City. While the City is not ready to consider direct historic preservation projects, it is aware of the eligible districts within the City and supportive of private citizens’ efforts to get this designated or to apply for federal funds for historic preservation projects.

In general the plan is supportive of historic preservation, in discussions of maintaining neighborhood and community character. However, while the plan mentions that citizens want design standards to reflect community character, there is no strategy included to examine the City’s current zoning and development standards to see where these could be improved, and better encourage compatible infill design, walkable streets, communicating neighborhoods, and maintenance of existing historic properties.

In addition the plan mentions integrating the railroad station and tracts with the downtown character, but there does not appear to be a strategy for how to move in that direction. The proposed new mixed-use zoning district to encourage a variety of housing styles and features is an excellent idea for dealing with creating interesting new places to live, but the Division of Historical and Cultural Affairs feels that some concrete strategies should also be included for maintaining the existing areas. It is clear from the photographs that the City is encouraging small-scale efforts to improve the visual and economic appeal of the downtown area. The City is listed as participating in the

Delaware Economic Development Office's Commercial District's Affiliates program, but it is not mentioned in the plan as a tool to improve the downtown. There should be a specific strategy to continue this program, even if the City does not want to qualify for the full Main Street program. If you have any questions or concerns, please contact Alice Guerrant at 302-736-7412.

Department of Transportation – Contact: Bill Brockenbrough 760-2109

- For the economic development information provided in Chapter 9 of the plan, DelDOT suggests that some comparison statistics be provided, similar to the demographic information in Chapter 10, so that a reader can know how Harrington compares to the rest of the County and the State. For example, in the section on poverty, they see that 13.9 percent of the residents were in poverty. Out of context, this figure might be taken as particularly good or bad. In fact, it is comparable to Kent County as a whole.
- The section in Chapter 11 on the US 13 Corridor Capacity Preservation Program cites DelDOT's Corridor Capacity Preservation Program Manual. Unfortunately, that manual is now about 11 years old and needs to be updated. DelDOT recommends that the Town contact the current manager for the Program, Mr. Tom Felice, and work with him to revise this section of the Plan. Mr. Felice may be reached at (302) 760-2338.

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

DNREC offers several comments and suggestions to improve conservation and protection of the City's resources. While the cumulative impact of various program suggestions and concerns may sound negative, the intent is to improve the plan elements related to environmental protection, open space, recreation and water quality and supply. DNREC would welcome the opportunity to meet with the City in a collaborative manner to discuss these recommendations and possible future implementing ordinances.

Chapter 4, City Utilities

Stormwater Management and Drainage

- **Recommendation:** Consider treating flooding/drainage/stormwater management as a public utility. Move section on Waterways and Drainage-Stormwater and Tax Ditches from Chapter 7, Environmental Protection, to Chapter 4, City Utilities.
- **Recommendation:** Explore the feasibility of a stormwater utility to fund upgrades to existing stormwater infrastructure. Upgrades to the stormwater system may reduce pollutant loads and help reach the established total maximum daily load for nitrogen,

phosphorus, and bacteria. Reach out to the Kent Conservation District, Kent County, and the Delaware Clean Water Advisory Council as partners in funding stormwater retrofits.

Chapter 5, City Services

Parks and Recreation

- **Recommendation:** Combine section on Parks and Recreation from Chapter 8, Land Use and Growth Management (pages 15-17), with section on Parks and Recreation, Chapter 5, City Services (pages 9-11).
- **Recommendation:** Conduct and document an inventory of parks and open space within the City.

Chapter 7, Environmental Protection

- **Recommendation:** First bullet on page 3: The Division of Soil and Water Conservation is now known as the Division of Watershed Stewardship. Please note the change.
- **Recommendation:** First bullet on page 3: The Kent Conservation District is the delegated agency for sediment and stormwater review in Kent County and the City of Harrington. Pre-application meetings will be held with the Kent Conservation District and the Stormwater Assessment Study will be submitted to the District. Please note the change.

Please note that the current Sediment & Stormwater regulations are undergoing revisions. At this time the effective date of the revised regulations will be January 1, 2014.

- **Recommendation:** Move the section on source water protection, including a discussion of the City's source water protection ordinance, from Chapter 7, Environmental Protection, to Chapter 4, City Utilities.

Chapter 8, Land Use and Growth Management

Annexations

- **Recommendation:** When considering areas for annexation, the City's analysis should consider the City's ability to provide utilities and services to the annexed areas. The City should also examine whether or not their existing ordinances provide adequate protections for woodlands, wetlands, flood-prone areas, source water protection areas, etc., as annexed lands are brought in to the City, presumably for some type of development.

Chapter 9, Economic Development and Redevelopment

Brownfields

Brownfields are real property that may be vacant, abandoned or underutilized as a result of a reasonably-held belief that they may be environmentally contaminated (7 Del.C. § 9103(3)). Productive use of these idle properties provides “new” areas for economic development, primarily in former industrial/urban areas with existing utilities, roads and other infrastructure. DNREC encourages the development of Brownfields and can provide grant funding and other assistance when investigating and remediating Brownfield sites.

The Delaware Brownfields Marketplace is an interactive database that contains a list of market-ready Brownfield sites throughout Delaware. The inventory is designed to make it easier for potential buyers and developers to locate available Brownfield properties. Cleaning up and reinvesting in these properties protects the environment, reduces blight, and helps to create jobs for Delaware citizens, while preserving Delaware’s precious green space and natural resources.

To add sites in your municipality to the Marketplace (with owner approval) or to determine if any sites in your municipality are Brownfields, please contact Melissa Leckie at DNREC’s Site Investigation and Restoration Section at (302) 395-2600 or by e-mail at Melissa.Leckie@state.de.us . For more information online, please visit: <http://apps.dnrec.state.de.us/BFExt/BFExtMain.aspx>

- **Recommendation:** If any future development occurs on sites with previous manufacturing, industrial, or agricultural use, SIRS strongly recommends that the land owner(s) perform environmental due diligence of the property by performing a Phase I Environmental Site Assessment (*including a title search to identify environmental covenants*) in accordance with 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.

Please note that the former Berry Plastics (DE-1526) is a Site Investigation and Restoration Section (SIRS) site.

Chapter 14, Harrington Health Community

Air Quality

The City of Harrington is encouraged to implement transportation alternatives and land use measures that will substantially enhance air quality and reduce air emissions. For instance, DNREC fully support efforts that improve traffic flow and reduce vehicle emissions. DNREC also supports efforts to provide tie-ins to the nearest bike paths and links to any nearby mass transport systems including parks, public and cultural facilities and residential neighborhoods.

There are additional measures that can be implemented to reduce the impact of growth and development on air quality in Harrington. Should the City have any questions, the Division of Air Quality points of contact are Phil Wheeler and Deanna Cuccinello, and they may be reached at (302) 739-9402.

- **Recommendation:** The Town should address air quality as a quality of life issue for its residents in the Comprehensive Plan, detailing specific emission mitigation measures.

Chapter 15, Implementation

Wetlands Delineations:

- **Recommendation:** Require 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.

Freshwater Wetlands Protections:

- **Recommendation:** Implement regulations to protect freshwater wetlands where regulatory gaps exist (i.e., isolated wetlands and headwater wetlands).

100 Foot Upland Buffer

Based on a review of existing buffer research by Castelle et al. (Castelle, A. J., A. W. Johnson and C. Conolly. 1994. *Wetland and Stream Buffer Requirements – A Review*. J. Environ. Qual. 23: 878-882.), an adequately-sized buffer that effectively protects water quality in 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 all water bodies (including ditches) and wetlands.

- **Recommendation:** Require a 100-foot upland buffer width from all delineated wetlands (approved by the USACE and DNREC) or water bodies (including ditches).

Total Maximum Daily Loads (TMDLs)

All open space land uses should be designed and managed in a manner that mitigates or reduces nutrient pollutant loading and its damaging impacts to water quality. Since changes in land use often increase runoff of nutrient pollutants into nearby waterways (including wetlands) draining

to a common watershed, these nutrient pollutant loading impacts should be assessed at the preliminary project design phase. To this end, the Watershed Assessment Section has developed a methodology known as the “Nutrient Load Assessment Protocol” to assess such impacts. The protocol, which is currently being updated to be more accurate and user-friendly, is a tool used to assess changes in nutrient loading that result from the conversion of individual or combined land parcels to a different land use(s), and serves as a “benchmark indicator” of that project’s likely impacts to water quality. It is the intention of this protocol to inform those relevant governmental entities (i.e., State, county, and municipal) how a given project will affect water quality in their jurisdictions, while informing/encouraging developers of the need to incorporate better conservation practices (i.e., BMPs) in their project designs to help improve water quality.

- **Recommendation:** Require completion of a Nutrient Budget protocol before granting preliminary approval for any proposed projects/developments.
- **Recommendation:** Require the applicant use any combination of approved Best Management Practices (BMPs) to meet the required TMDLs for the affected watershed(s) in question, so as to reduce or mitigate nutrient loading impacts on water quality.

Open Space

We note that it might be helpful to have a consistent definition of “open space” in your comprehensive plan and/or City ordinances. In a guidance document that DNREC is developing for the PLUS and other local technical review processes, we have defined open space as: those areas with public value in a predominantly natural state and undeveloped condition. Such areas may contain, but are not limited to, wildlife and native plant habitat, forest, farmland, meadows, wetlands, floodplains, shorelines, stream corridors, steep slopes, and other areas that have species or habitats of conservation concern.

Open Space may be preserved, enhanced and restored in order to maintain or improve the natural, ecological, hydrological, or geological values. An important design element to consider when incorporating Open Space in a development is to take maximum advantage of adjoining Open Space areas. This will advance the goal of an interconnected network of habitat corridors for wildlife and provide for future potential linkages.

Open Space is not:

- impervious surfaces (e.g., roads, parking lots, sidewalks, buildings)
- swimming pools or ponds that are lined or contain an impervious substrate
- stormwater management structures
- wastewater treatment systems

Types of Recreational Open Space:

Passive-Passive recreation areas include only low-impact activities having little or no disturbance on natural features.

Active-Active recreation areas (e.g., ball fields, playgrounds) should be placed only in Open Space areas that do not already contain natural habitat.

Impervious Surface Mitigation Plan:

- **Recommendation:** Require the calculation for surface imperviousness (for both commercial and residential development) take in to account all constructed forms of surface imperviousness - including all paved surfaces (roads, parking lots, and sidewalks), rooftops, and open-water storm water management structures.
- **Recommendation:** To encourage compact development and redevelopment in the City's central business area, require an impervious surface mitigation plan for all residential and commercial developments exceeding 20% imperviousness outside that area, or at least in excellent recharge areas outside that area. 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 how these impacts will be mitigated. If the impacts cannot be mitigated, the site plan should then be modified to reduce the impacts from impervious cover.

Poorly Drained (Hydric) Soils

- **Recommendation:** Prohibit development in poorly or very poorly-drained (hydric) soil mapping units. Building in such areas predictably leads to flooding and drainage concerns from homeowners, as well as significant expense for them and, often, taxpayers. 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.

Green Technology Stormwater Management:

- **Recommendation:** Require the applicant to use "green-technology" storm water management in lieu of "open-water" storm water management ponds whenever practicable.

Drainage Easements:

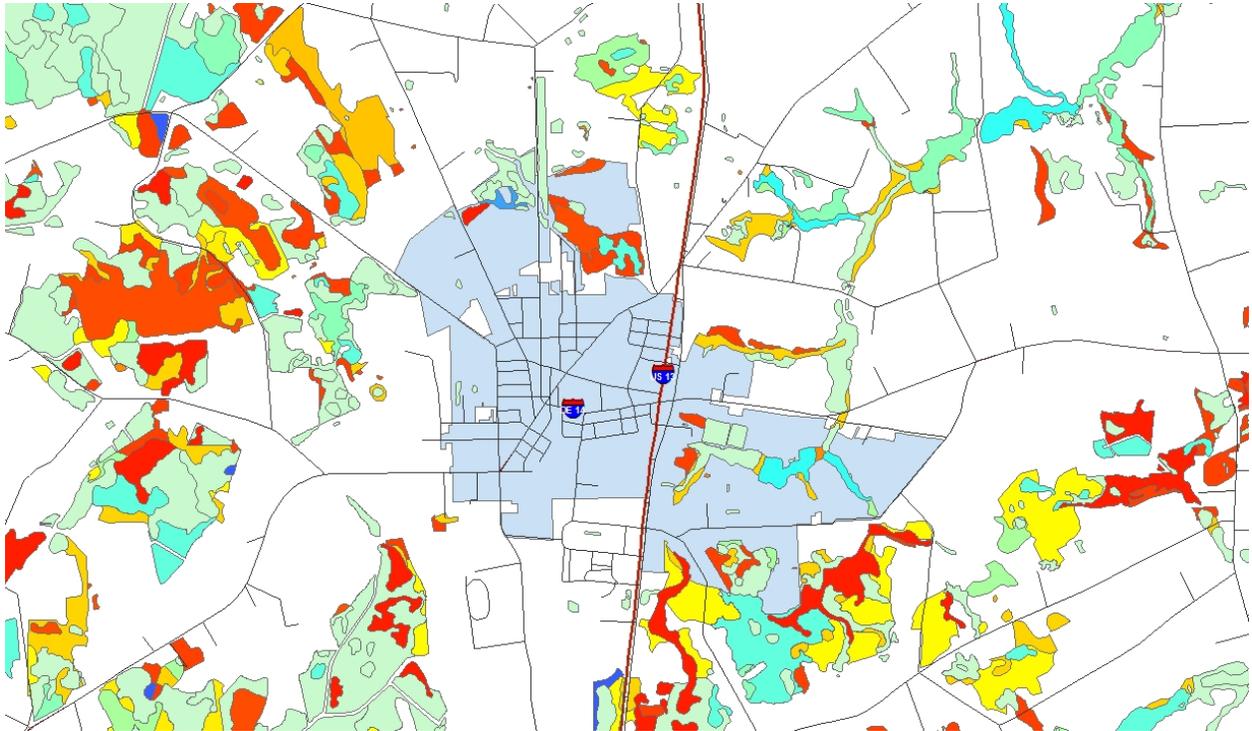
- **Recommendation:** The City should pursue drainage easements along waterways and storm drains where currently there is none.

Additional recommendations regarding stormwater management and drainage:

- **Recommendation:** Consider adding upgrades to stormwater infrastructure when developing a Capital Improvements Program.
- **Recommendation:** The City should incorporate a requirement for a stormwater and drainage review in the City's pre-approval requirements for new development requests. Proposed development projects should hold a project application meeting with the delegated agency, the Kent Conservation District, to discuss stormwater and drainage prior to the City reviewing and/or approving plans or issuing building permits. The Sediment and Stormwater Program is set to begin requiring a project application meeting for all proposed land disturbing activities that require a detailed Sediment & Stormwater Plan within the coming year. These meetings are structured to assist developers in the design process and for early notification of approval requirements. In order to schedule a project application meeting, the applicant must forward a completed Stormwater Assessment Study (SAS) to the appropriate Delegated Agency. A Stormwater Assessment Report will be generated as a result of the meeting. Please contact Elaine Webb with the DNREC Sediment and Stormwater Program if you have any questions regarding this new process. Please note that this process does not replace the State's PLUS process.
- **Recommendation:** As the City updates any land use or subdivision codes, the City should make a note of the Sediment and Stormwater requirements on any construction-related project application checklists, etc.
- **Recommendation:** Lines and grades: To help resolve drainage issues arising from new construction during and post construction, the City should have a lines and grades requirement for new construction. County/municipal building inspectors would be able to use approved lines and grades requirement to field verify prior to issuance of Certificate of Occupancy or building permit, as appropriate.
- **Recommendation:** The City should seek opportunities to improve water quality by incorporating best management practices when upgrading streets, sidewalks, and parking areas.

Exhibit 5, Wetlands and Floodplain Map

- **Recommendation:** Please consider re-naming Exhibit 5 a "Floodplain Map," instead of a "Wetlands and Floodplain Map." Not all wetlands are in floodplains, and not all floodplains contain wetlands. A floodplain map is not intended to map wetlands so it is not appropriate to be used as such. Please consider the following Statewide Wetland Mapping Project (SWMP) map as an additional exhibit in the appendices section (and naming the map a "Statewide Wetlands Mapping Project (SWMP) Map").



Approval Procedures:

1. Once all edits, changes and corrections have been made to the plan, please submit the completed document (text and maps) to our office for review. **Your PLUS response letter should accompany this submission.** Also include documentation about the public review process. In addition, please include documentation that the plan has been sent to other jurisdictions for review and comment, and include any comments received and your response to them.
2. Our office will require a maximum of 20 working days to complete this review.
 - a. If our review determines that the revisions have adequately addressed all certification items, we will forward you a letter to this effect.
 - b. If there are outstanding items we will document them in a letter, and ask the town to resubmit the plan once the items are addressed. Once all items are addressed, we will send you the letter as described above.
3. Once you receive our letter stating that all certification items have been addressed, the Planning Commission and Council should adopt the plan pending State certification. We strongly recommend that your Council adopt the plan by ordinance. The ordinance

should be written so that the plan will go into effect upon receipt of the certification letter from the Governor.

4. Send our office a copy of the adopted plan along with the ordinance (or other documentation) that formally adopts your plan. We will forward these materials to the Governor for his consideration.
5. At his discretion, the Governor will issue a certification letter to your City.
6. Once you receive your certification letter, please forward two (2) bound paper copies and one electronic copy of your plan to our office for our records.

Thank you for the opportunity to review this project. If you have any questions, please contact me at 302-739-3090.

Sincerely,

A handwritten signature in cursive script that reads "Constance C. Holland".

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