



STATE OF DELAWARE
EXECUTIVE DEPARTMENT
OFFICE OF STATE PLANNING COORDINATION

March 24, 2014

Jayme Baer
111 Patriot Drive, Suite D
Middletown, DE 19

RE: PLUS review 2014-02-04, Northeast Christian Church

Dear Jayme Baer,

Thank you for meeting with State agency planners on February 26, 2014 to discuss the proposed plans for the Northeast Christian Church. According to the information received, you are seeking review of a proposed 36,000 square foot church on 22.92 acres along Cedar Lane Road near Middletown, DE.

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 project is located in Investment Level 2 according to the *State Strategies for 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.

Code Requirements/Agency Permitting Requirements

State Historic Preservation Office – Contact Terrence Burns 736-7404

There is a known historic property on this parcel, the T. J. Houston House (N-5131), which was determined eligible for the National Register of Historic Places in accordance with National Park Service Standards. The Pomeroy and Beers Atlas of 1868 and the USGS Topographic Map of 1931 both indicate this house. The State Historic Preservation Office requests that the church give consideration to preserving and reusing the house within their development plan. The developer should also be aware of the Delaware Unmarked Human Burials and Human Skeletal Remains Law, which is outlined in Chapter 54 of Title 7 of the Delaware Code.

122 Martin Luther King Jr. Blvd. South – Haslet Armory · Third Floor · Dover, DE 19901
Phone (302)739-3090 · Fax (302) 739-5661 · www.stateplanning.delaware.gov

Abandoned or unmarked family cemeteries are very common in the State of Delaware. They are usually in rural or open space areas, and sometimes near or within the boundary of an historic farm site. Even a marked cemetery can frequently have unmarked graves or burials outside of the known boundary line or limit. Disturbing unmarked graves or burials triggers the Delaware's Unmarked Human Burials and Human Skeletal Remains Law (Delaware Code Title 7, Chapter 54), and such remains or discoveries can result in substantial delays while the procedures required under this law are carried out. If there is a discovery of any unmarked graves, burials or a cemetery, it is very costly to have them archaeologically excavated and the burials moved. The Division of Historical & Cultural Affairs recommends that owners and/or developers have a qualified archaeological consultant investigate their project area, to the full extent, to see if there is any unmarked cemetery, graves, or burial sites. In the event of such a discovery, the Division of Historical & Cultural Affairs also recommends that the plans be re-drawn to leave the full extent of the cemeteries or any burials on its own parcel or in the open space area of the development, with the responsibility for its maintenance lying with the landowner association or development. If you would like to know more information that pertains to unmarked human remains or cemeteries, please check the following websites for additional information: www.history.delaware.gov/preservation/umhr.shtml and www.history.delaware.gov/preservation/cemeteries.shtml.

Therefore, prior to any demolition or ground-disturbing activities, the developer should consider hiring an archaeological consultant to examine the parcel for potential historic or cultural resources, such as a potential archaeological site, a cemetery or unmarked human remains. Furthermore, the developer should also include a sufficient landscaping protection or barrier between the proposed development, and the T. J. Houston House (N-5131), in order to protect it from any adverse sound and visual effects. In addition, 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 cultural or historic resources. Owners and developers who may plan to apply for an Army Corps of Engineers permit or for federal funding, such as HUD or USDA grants, should be aware of the National Historic Preservation Act of 1966 (as amended). Regulations promulgated for Section 106 of this Act stipulate that no ground-disturbing or demolition activities should take place before the Corps or other involved federal agency determines the area of potential effect of the project undertaking. These stipulations are in place to allow for comment from the public, the Delaware State Historic Preservation Office, and the Advisory Council for Historic Preservation about the project's effects on historic properties. Furthermore, any preconstruction activities without adherence to these stipulations may jeopardize the issuance of any permit or funds. If you need further information or additional details pertaining to the Section 106 process and the Advisory Council's role, please review the Advisory Council's website at www.achp.gov.

Office of the State Fire Marshal – Contact: R.T. Leicht 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 1000 gpm for 1-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 the site of a Place of Assembly, 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.
 - Buildings greater than 10,000 Sq.Ft. are required to meet fire lane marking requirements
 - Show Fire Department Connection location (Must be within 300 feet of fire hydrant), and detail as shown in the DSFPR.
 - Show Fire Lanes and Sign Detail as shown in DSFPR

- **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.
 - 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

Department of Natural Resources and Environmental Control – Contact Kevin Coyle 735-3495

- **TMDLs.** The project is located in the greater Delaware River and Bay drainage, specifically within the Appoquinimink 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 (under the auspices of Section 303(d) of the Clean Water Act). 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. The TMDL for the Appoquinimink River watershed calls for a 60 percent reduction in nitrogen and phosphorus from baseline conditions. The TMDL also calls for an 8 percent (freshwaters) reduction in bacteria from baseline conditions.

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 or areas of open space in excess of 10 acres. This project’s open space may exceed this 10-acre threshold. Please contact the Delaware Nutrient Management Program at 739-4811 for further information concerning compliance requirements or view the following weblink for additional information:
<http://dda.delaware.gov/nutrients/index.shtml>

John Martin, (302) 739-9939, John.Martin@state.de.us

- **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 05-CPCN-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.

Ricardo Rios, (302) 739-9944, Ricardo.Rios@state.de.us

- **Sediment and Stormwater Program.** A sediment and stormwater plan will be required for 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 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. 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 Department of Land Use at (302) 395-5470 for details regarding submittal requirements and fees.

James Sullivan, (302) 739-9921, James.Sullivan@state.de.us

- **Water Resource Protection Areas.** The DNREC Water Supply Section, Ground-Water Protection Branch (GPB) has determined that a significant portion of the project falls within an excellent groundwater recharge potential area for the New Castle County (see attached map). GPB acknowledges that Sheet 3 of the site plan indicates that a portion of excellent groundwater recharge potential area is to remain undisturbed.

New Castle County (NCC) refers to excellent ground-water recharge potential areas as 'recharge areas'. Recharge areas are characterized as deposits of coarser grained material that have the best ability to transmit water vertically through the unsaturated zone to the water table. The NCC recharge areas were mapped using the methods described in the Delaware Geological Survey Open File Report No. 34, "Methodology for Mapping Ground-Water Recharge Areas in Delaware's Coastal Plain" (Andres, 1991), and depicted in a series of maps prepared by the Delaware Geological Survey (Butoryak and Tally, 1993).

The soils in recharge areas are able to transmit water very quickly from the land surface to the water table. This map category (excellent) is an indicator of how fast contaminants will move and how much water may become contaminated (Andres, 2004). Land use activities or impervious cover on areas of excellent ground-water recharge potential may adversely affect ground water in these areas.

GPB recommends:

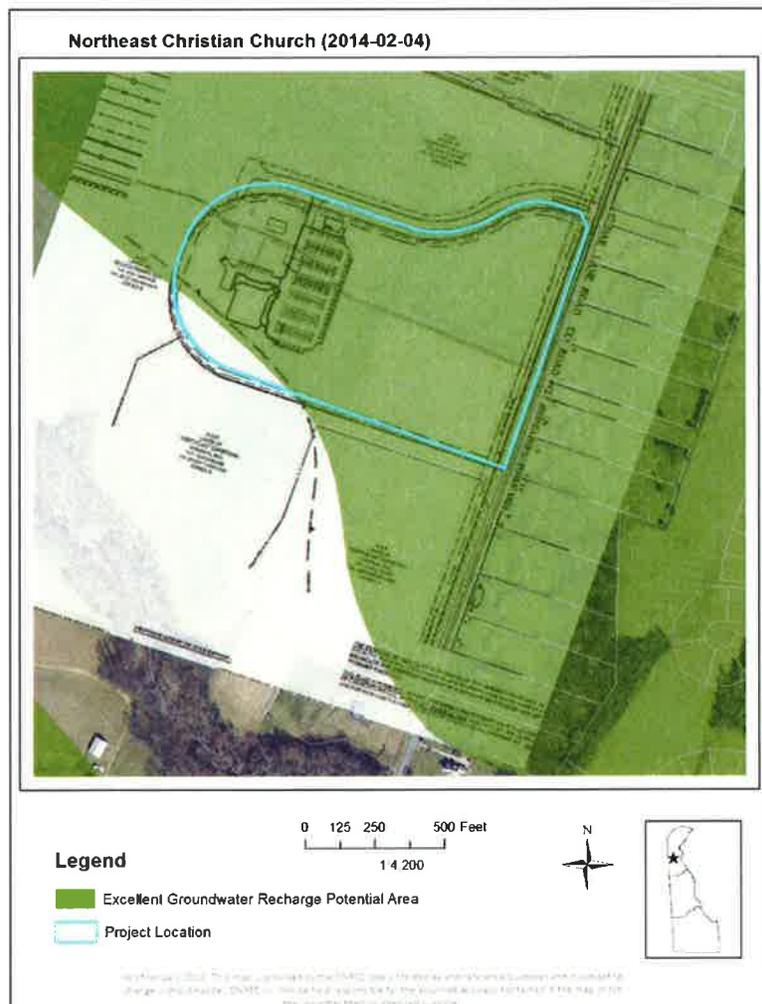
- Pretreatment of parking area runoff to remove dissolved chemical and nutrient loads prior to infiltration
- Use Better Management Practices in the design, construction, and maintenance of the stormwater management system designed to address water quality with respect to nutrient and other pollutant loads.

The construction phase of stormwater management ponds require excavation, hauling, and grading. The heavy equipment used in this phase has the capacity to compact and degrade the structure of the strata that defines the area as an excellent ground water recharge area (Schueler, 2000a). Changes to the structural soil properties may cause significant reduction in recharge capacity. Installing storm-water management ponds in excellent

ground-water recharge areas has the potential to contaminate the ground water beneath it and infiltrate into the aquifer (Schueler, 2000b).

In addition, because the excellent ground water recharge area can so quickly affect the underlying aquifer if contaminants are spilled or discharged across the area, the storage of hazardous substances or wastes should not be allowed within the area unless specific approval is obtained from the relevant state, federal, or local program.

Anne Mundel, (302) 739-9945, Anne.Mundel@state.de.us



References

- Andres, A. Scott, 1991, Methodology for Mapping Ground-Water Recharge Areas in Delaware's Coastal Plain: Delaware Geological Survey Open File Report No. 34, p. 18.
- Butoryak, Kathleen R. , and Talley, John H., 1993, Delineation of Ground-Water Recharge Resource Protection Areas in the Coastal Plain of New Castle County,

Delaware: Delaware Geological Survey Project Report for the Water Resources Agency for New Castle County, p. 26.

- Schueler, T. R., 2000a, The Compaction of Urban Soils, *in* Schueler, T.R., and Holland, H.K., eds., *The Practice of Watershed Protection*: Ellicott City, MD, Center for Watershed Protection, p. 210 - 218.
- Schueler, T. R., 2000b, Pollutant Dynamics of Pond Muck, *in* Schueler, T.R., and Holland, H.K., eds., *The Practice of Watershed Protection*: Ellicott City, MD, Center for Watershed Protection, p. 453 - 460.

Tank Management. 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 are no confirmed leaking underground storage tank (LUST) projects located within a quarter mile from the proposed project area.
- No environmental impacts are anticipated; however, 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

Elizabeth Wolff, (302) 395-2500, Elizabeth.Wolff@state.de.us

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 to your project:

Table 1: Potential Regulatory Requirements	
Regulation	Requirements
7 DE Admin. Code 1106 - Particulate Emissions from Construction and Materials Handling	<ul style="list-style-type: none"> • 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.

7 DE Admin. Code 1113 – Open Burning	<ul style="list-style-type: none"> Prohibit open burns statewide during the Ozone Season from May 1-Sept. 30 each year. Prohibit the burning of land clearing debris. Prohibit the burning of trash or building materials/debris.
7 DE Admin. Code 1135 – Conformity of General Federal Actions to the State Implementation Plan	<ul style="list-style-type: none"> 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)
7 DE Admin. Code 1141 – Limiting Emissions of Volatile Organic Compounds from Consumer and Commercial Products	<ul style="list-style-type: none"> Use structural/ paint coatings that are low in Volatile Organic Compounds. Use covers on paint containers when paint containers are not in use.
7 DE Admin. Code 1144 – Control of Stationary Generator Emissions	<ul style="list-style-type: none"> Ensure that emissions of nitrogen oxides (NO_x), non-methane hydrocarbons (NMHC), particulate matter (PM), sulfur dioxide (SO₂), carbon monoxide (CO), and carbon dioxide (CO₂) from emergency generators meet the emissions limits established. (See section 3.2). Maintain recordkeeping and reporting requirements.
7 DE Admin. Code 1145 – Excessive Idling of Heavy Duty Vehicles	<ul style="list-style-type: none"> Restrict idling time for trucks and buses having a gross vehicle weight of over 8,500 pounds to no more than three minutes.

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

Deanna Morozowich, (302) 739-9402, Deanna.Morozowich@state.de.us

Department of Transportation – Contact Bill Brockenbrough 760-2109

- Per Section 2.3.1 of the Standards and Regulations for Subdivision Streets and State Highway Access, Traffic Impact Studies (TIS) are warranted for developments generating more than 400 vehicle trip ends per day or 50 vehicle trip ends per hour. DelDOT is aware that New Castle County has a similar requirement with regard to hourly trip generation and on Sundays we would expect a church of the size proposed to warrant a TIS on both a daily and an hourly basis. With that said, we anticipate waiving our requirement for a TIS in lieu of the church’s participating in a Transportation Improvement District (TID).
- For several years now, DelDOT has been engaged in a planning study, from which we hope to create a Southern New Castle County (SNCC) TID for the area bounded by Marl Pit Road, the Chesapeake and Delaware Canal, US Route 13 and Delaware Route 71. The object of a TID is to provide more for comprehensive land use and transportation planning while making it easier to develop in ways and locations that are consistent with the local comprehensive plan(s). In the spring of 2013, DelDOT adopted expanded regulations regarding TIDs (available at

http://www.deldot.gov/information/pubs_forms/revisions_to_ASR/TrafficImpactStudiesDraftRegulationAmendment130214.pdf) that outline a process that differs in some respects from the work done to date on this particular TID. We are working with New Castle County and area developers, including the church, to begin implementing the TID. Recently, the church and several other developers in the area have entered recoupment agreements with DelDOT and New Castle County. Under these agreements, as the developers build their projects they will make payments through the County to DelDOT in lieu of doing a TIS and building off-site improvements. More information on the SNCC TID is available from our Assistant Director for Development Coordination, Mr. Marc Coté. Mr. Coté can be reached at 302) 760-2165.

- Because the site would generate more than 200 vehicle trip ends per day (on Sundays) a Traffic Operational Analysis may be required as part of the site plan review, in accordance with Section 2.14 (formerly 3.9) of the Standards and Regulations. As the site access would be by easement through an access road to be owned by the MOT Charter High School, we would expect the school to have responsibility for any TOA we might require. We mention the possible requirement now on the chance that the church might move forward with their plans before the school moves forward with theirs.
- The site access on Cedar Lane Road (New Castle Road 427) must be designed in accordance with DelDOT's Standards and Regulations for Subdivision Streets and State Highway Access, which is available at http://www.deldot.gov/information/pubs_forms/manuals/subdivisions/pdf/SubdivisionManualRevision1proposed060110.pdf.
- In accordance with Section 3.6.5 and Figure 3-3 of the Standards and Regulations for Subdivision Streets and State Highway Access, DelDOT will require dedication of right-of-way along the site's frontage on Cedar Lane Road (New Castle Road 427) to provide a minimum of 40 feet of right-of-way from the road centerline. The right-of-way dedication note has been revised to the following, "**An X-foot wide right-of-way is hereby dedicated to the State of Delaware, as per this plat.**" Preliminarily, it appears that the sketch plan already meets this requirement.
- In accordance with Section 3.6.5 of the Standards and Regulations for Subdivision Streets and State Highway Access, DelDOT will require the establishment of a 15-foot wide permanent easement across the property frontage on Cedar Lane Road (New Castle Road 427) for a future 10-foot wide pedestrian/bike path. The location of the easement shall be outside the limits of the ultimate right-of-way. The easement area can be used as part of the open space calculation for the site. The following note is required, "**A 15-foot wide permanent easement is hereby established to the State of Delaware, as per this plat.**"
- The proposed church site, while not directly adjacent, is relatively close to the right-of-way for an as-yet unbuilt section of US Route 301. Therefore, in accordance with Section 3.7 of the Standards and Regulations for Subdivision Streets and State Highway Access, DelDOT will require a noise analysis and may require mitigation measures to buffer the campus from the highway noise. We

recommend that the noise analysis be done and that any needed mitigation measures be included in the development of the subdivision 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.

Department of Transportation – Contact Bill Brockenbrough 760-2109

- Please refer to the DelDOT website for guidance as to whether a pre-submittal meeting is required and how to prepare for one. That guidance is available at <http://www.deldot.gov/information/business>.
- Please check to determine if any utilities will need to be relocated as part of this project.
- All PLUS comments should be addressed prior to submitting record, subdivision or entrance plans for review.

Department of Natural Resources and Environmental Control – Contact Kevin Coyle 735-3495

Soils Assessment. The soils on this parcel are moderately well drained to well drained, and have moderate to few limitations for development. The following soil mapping units were mapped on subject parcel:

- 1) Reybold-Queponco complex & Reybold silt loam – well drained
- 2) Woodstown loam – moderately well drained



Figure 1: NRCS soil survey mapping update in the immediate vicinity of the proposed project

Additional information on TMDLs and water quality. In response to concerns about the need for reducing nonpoint source nutrient (nitrogen and phosphorus) and bacterial pollutants to levels sufficient to meet the prescribed TMDL reduction requirements in the Appoquinimink watershed, a multifaceted and comprehensive process known as a Pollution Control Strategy (PCS) has been developed to enable such reductions. Specifically, a PCS is a combination of best management practices and control technologies that reduce nutrient and bacterial pollutant runoff loading in waters of a given watershed to level(s) consistent with the TMDL(s) reduction levels specified for that watershed. The PCS for the Appoquinimink River watershed consists of recommendations from the following four areas: agriculture, land preservation (open space), stormwater, and wastewater.. Additional information about Appoquinimink River PCS is available from the follow web link:

<http://www.dnrec.delaware.gov/swc/wa/Pages/WatershedManagementPlans.aspx>.

In further support of the PCS, the applicant is also strongly urged to reduce nutrient and bacterial pollutants through voluntary commitment to the implementation of the following recommended BMPs:

- Applicant should maintain as much of the existing open space as possible; we further suggest additional native tree and native herbaceous planting, wherever possible.
- 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 proposed project will significantly increase impervious cover which will subsequently increase surface water runoff impacts, wherever practicable, use pervious paving materials (instead of conventional asphalt and concrete) to mitigate said impacts. The parking area in the immediate vicinity of the proposed church is of particular concern, and is an area that would be especially practicable for the installation of pervious paving materials.
- 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. Please contact Lara Allison at 739-9939 for further information about rain gardens.
- 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 John Martin or Jen Walls at 302-739-9939 for further information on the protocol.

Habitat Conservation. According to site plans provided, this project may impact a small feeder stream that empties into Drawyers Creek. Drawyers Creek hosts a number of rare plant species and also a number of wetlands that have been identified as suitable for bog turtles (*Glyptemys muhlenbergii*). The bog turtle is a federally listed species, protected under the Endangered Species Act.

Although no rare, threatened and endangered species and/or unique natural communities have been identified directly in the proposed project area, construction at this site may impact the quality of water entering Drawyers Creek.

We strongly recommend project planners to use best management practices to minimize reduction of the quality of water entering Drawyers Creek.

Matthew Bailey, (302) 735-8677, Matthew.Bailey@state.de.us

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 TMS. If any ASTs greater than 12,500 gallons are installed, they are also subject to installation approval by the TMS.

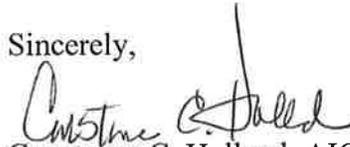
Delaware State Fire Marshall's Office – Contact: R.T. Leicht 739-4394

- 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, 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,



Constance C. Holland, AICP

Director, Office of State Planning Coordination

CC: New Castle County
Town of Middletown