



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

January 20, 2014

Ms. Eileen Fogarty
New Castle County
87 Reads Way
New Castle, DE 19720

RE: PLUS review 2014-12-03, New Castle County Ordinance 14-127

Dear Ms. Fogarty,

Thank you for sending a representative from your office to meet with State agency planners on December 17, 2014 to discuss the proposed New Castle County Ordinance 14-127. According to the information received, you are seeking review of an ordinance for a text amendment to the UDC regarding Parking Structure GFA in determining whether a plan meets the definition of a minor land development.

Please note that changes to the ordinance, 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 Office of State Planning Coordination has no objection to the ordinance as written.

The Department of Natural Resources and Environmental Control is generally supportive of efforts to promote more compact parking site areas/reduce impervious cover and the preservation of open space on a parcel of land.

According to DelDOT, a parking structure built as an alternative to surface parking does not contribute to the trip generation of a development. To at least some extent, the floor area criteria for defining a minor land development are surrogates for trip generation criteria. Therefore the floor area of any parking structures that replace surface parking otherwise required by code ought to be excluded. For this reason, DelDOT supports the proposed ordinance.

There were no other comments from State agencies.

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Should the ordinance be adopted please forward a copy to OSPC for our files. 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 on a white background.

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

CC: George Haggerty