



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

July 23, 2015

Mr. Rob Pierce
City of Milford
201 Walnut Street
Milford, DE 19963

RE: PLUS review 2015-06-02, City of Milford Comprehensive Plan Amendment

Dear Rob,

Thank you for meeting with State agency planners on June 24, 2015 to discuss the proposed comprehensive Plan Amendments for the City of Milford. The amendments addresses proposed changes of certain parcels in Milford's Proposed Land Use Map.

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

- This application represents a series of amendments to the Milford Comprehensive Plan. We understand that these amendments have been awaiting action for some time, and that it is important for the City to move forward with them expediently. While we would have preferred that these were included in the Plan Update that is underway, we understand the time constraints. We have no comments on the individual plan amendments. Our office encourages the City to prepare an overall Plan Update to integrate these and other changes.

Department of Transportation – Contact: Bill Brockenbrough 760-2109

- DelDOT has no regulatory requirements with regard to any of the proposed Comprehensive Plan changes or rezoning applications. However, all of the proposed changes are prompted by currently pending or proposed future changes in land use that could require DelDOT participation in the City's site plan approval process, as per Section P.3 of the Development Coordination Manual and could require the developers to

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

obtain entrance plan approvals and entrance permits from DeIDOT, again as per Section P.3 of the Development Coordination Manual.

In all cases, the City should refer the applicants or their engineers to our Subdivision Review Coordinator for Kent County, Ms. Wendy Polasko, to determine what approvals they will need to obtain. We recognize that two of the proposed changes refer to parcels in Sussex County. Ms. Polasko's responsibilities include all of Milford, regardless of County. Ms. Polasko may be reached at (302) 760-2542.

With particular regard to the Perdue Farms parcels, we may be able to significantly limit our review if the company proposes no changes to its access or the volume of traffic using that access. However, we will need to determine those conditions apply.

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

Habitat and Wildlife.

- Note that the following comments apply to any projects that will result in the clearing of an acre or more (≥ 1) of trees:

Due to population declines largely caused by white nose syndrome, a fungal disease known only to affect bats, Northern Long-eared Bat (NLEB – *Myotis septentrionalis*) have been listed as federally threatened under the U.S. Endangered Species Act. Note that any project that proposes to clear an acre or more (≥ 1) of trees will be subject to review by the U.S. Fish and Wildlife Service. For more information, please contact Julie Thompson at Julie_Thompson@usfws.gov or 410-573-4595.

Perdue Real Estate Holdings, Inc. (PERDUE)

Source Water Protection Areas.

- The parcel intersects two undelineated wellhead protection areas for public wells owned by the City on the southeast side (see image). In developing this area, the City should consider their source water protection ordinances.



Air Quality.

- The Division of Air Quality (DAQ) notes that this area currently appears to be used for parking and that the Perdue site has a mix of residential and commercial neighbors. Between Perdue and its neighbors stands an established vegetative buffer. Please be advised that the following regulations may apply to this project:

Table 1: Potential Regulatory Requirements	
Regulation	Requirements
7 DE Admin. Code 1102 - Permits	<ul style="list-style-type: none"> • Report and obtain approval of equipment which has the potential to discharge air contaminants into the atmosphere • Submit any relevant information that the DAQ may request. Relevant information includes information that, in the DAQ’s opinion, is relevant to any permit application/registration or that is necessary to determine the applicability of or compliance with any State or Federal requirement, any permit term or condition, or any condition of registration. Such information also includes a permit application or a registration form, or a corrected or supplemented application/registration.
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.

	<ul style="list-style-type: none"> • 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>.

Additional measures may be taken to substantially reduce the air emissions associated with Perdue’s expansion. 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 energy efficiency translates into a percent reduction in pollution. The Energy Star Program is an 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.
- **Constructing with high albedo, high solar reflectance materials.** This includes roofing and hardscape. These materials help to reduce heat island impacts and, by extension, help to minimize the potential for localized ground-level ozone formation. These materials also help reduce demands on air conditioning systems and save on energy costs.
- **Providing shade for parking areas.** Approaches may include architectural devices, vegetation, or solar panels. Providing shade for parking areas helps to reduce heat island impacts, and, by extension, helps to minimize the potential for localized ground-level ozone formation. Such measures can also have the additional benefit of channeling or infiltrating stormwater.
- **Encouraging the use of safe multimodal transportation.** This measure can significantly reduce mobile source emissions. For every vehicle trip that is replaced by the use of a sidewalk, bike path, or mass transit, 7 pounds of VOC and 11.5 pounds of NOx are reduced each year. There is an existing DART bus stop within walking distance of the property on North Rehoboth Boulevard at the intersection of North Walnut Street and NW 10th Street. The stop is served by route 303, which extends from points north in Dover to points south in Georgetown.
- **Using retrofitted diesel engines during construction.** This includes equipment that is 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/maintaining trees in vegetative buffer areas.** Native trees reduce emissions by trapping dust particles and 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 development.

Amberwood Subdivision – Crop Production Services, Inc. (HOLLY HILL ROAD)

Source Water Protection Areas.

- The parcels proposed for rezoning from R-3 to I-2 are within an excellent groundwater recharge potential area. The City's zoning designation of I-2 represents a General

Industrial District. It appears that this zoning change is inconsistent with the City's Code of Ordinances §230-19.5 - Source Water Protection District.



Site Visit Request.

- Our Division of Fish and Wildlife scientists have not surveyed the project area. In order to provide more informed comments, we request the opportunity to conduct a survey of the forest within the project area. Specifically, we would like to evaluate the habitat and determine the potential for species of conservation concern prior to the initiation of any projects that disturb the forest or wetlands on site. Please note that our scientists have extensive knowledge of the flora and fauna of the state. The survey will be conducted at no expense to the landowner. Please contact Kate Fleming at (302) 735-8658 or at Kate.Fleming@state.de.us if the landowner will grant a site visit.

Bald Eagle.

- There is an active Bald Eagle (*Haliaeetus leucocephalus*) nest adjacent to the parcels proposed for rezoning. Bald eagles and their nests are protected under the federal Bald and Golden Eagle Protection Act (BGEPA). The U.S. Fish and Wildlife Service (USFWS) developed *National Bald Eagle Management Guidelines*, to help landowners and others minimize impacts to eagles, including disturbance, which is prohibited by the BGEPA. The guidelines focus on minimizing disturbance through the use of suggested buffer zones (330 ft. to 660 ft. from a nest) and time-of-year restrictions for certain activities in several categories. Portions of the areas proposed for rezoning do fall within these buffer zones. It will be necessary to contact Craig Koppie with the USFWS prior to engaging in any activities that may disturb the nest and nesting eagles. For more information, please contact Craig Koppie of the USFWS at (410) 573-4534 or Craig_Koppie@fws.gov.

Northern Long-Eared Bat.

- Due to population declines largely caused by white nose syndrome, a fungal disease known only to affect bats, Northern Long-eared Bat (NLEB – *Myotis septentrionalis*) have been listed as federally threatened under the U.S. Endangered Species Act. Note that any project that proposes to clear an acre or more (≥ 1) of trees will be subject to review by the U.S. Fish and Wildlife Service. For more information, please contact Julie Thompson at Julie_Thompson@usfws.gov or 410-573-4595.

Swamp Pink.

- Swamp pink (*Helonias bullata*) is a federally listed plant that has been documented just downstream of this project site, and as such, could potentially occur in the wetlands found along the eastern border of the project area. This species appears to be very sensitive to sedimentation. Note that a site visit will be necessary to determine if swamp pink is present on site.

Wetland Buffers.

- Although we have never surveyed this property, there are records of rare plants and freshwater mussel species within the tributary system that empties into Haven Lake as well as rare species within the Lake. Because of the State's concern regarding water quality, rare species and the amount of funding and staff time that is spent to manage water quality problems within State-owned ponds, wetland buffers of a minimum of 100 feet should be retained.

Air Quality.

- DNREC believes that rezoning to Industrial could potentially change future land use compatibility, giving way to additional industrial and/or commercial uses in a largely agricultural part of Milford. DNREC further believes that such development would introduce negative impacts to human health and the environment through increased air pollution and decreased air benefits. Please note that DNREC encourages sustainable growth practices that:
 - Control sprawl;
 - Preserve rural and forested areas;
 - Identify conflicting land use priorities;
 - Encourage growth on previously developed sites and denser communities while at the same time protect our diminishing land base;
 - Coordinate transportation, environment, and climate protection plans with land use plans; and
 - Demonstrate that communities can achieve the qualities of privacy, community, and contact with nature without degrading the natural environment or generating unacceptable environmental costs in terms of congestion, use of natural resources, or pollution.

Wilkins Road Area

Source Water Protection Areas.

- There are two wellhead protection areas for public wells within the parcels proposed for rezoning (see image). In developing this area, the City should consider their source water protection ordinances. If the redevelopment is to be served by City water, the wells should be properly sealed.



Northern Long-Eared Bat.

- Due to population declines largely caused by white nose syndrome, a fungal disease known only to affect bats, Northern Long-eared Bat (NLEB – *Myotis septentrionalis*) have been listed as federally threatened under the U.S. Endangered Species Act. Note that any project that proposes to clear an acre or more (≥ 1) of trees will be subject to review by the U.S. Fish and Wildlife Service. For more information, please contact Julie Thompson at Julie_Thompson@usfws.gov or 410-573-4595.

Lands of Charles Wilkerson

Site Visit Request.

- Our Division of Fish and Wildlife scientists have not surveyed the project area. In order to provide more informed comments, we request the opportunity to conduct a survey of the forest and wetlands within the project area. Specifically, we would like to evaluate the habitat and determine the potential for species of conservation concern prior to the initiation of any projects that disturb the forest or wetlands on site. Please note that our scientists have extensive knowledge of the flora and fauna of the state. The survey will be conducted at no expense to the landowner. Please contact me at (302) 735-8658 or at Kate.Fleming@state.de.us if the landowner will grant a site visit.

Northern Long-Eared Bat.

- Due to population declines largely caused by white nose syndrome, a fungal disease known only to affect bats, Northern Long-eared Bat (NLEB – *Myotis septentrionalis*) have been listed as federally threatened under the U.S. Endangered Species Act. Note that any project that proposes to clear an acre or more (≥ 1) of trees will be subject to review by the U.S. Fish and Wildlife Service. For more information, please contact Julie Thompson at Julie.Thompson@usfws.gov or 410-573-4595.

Key Wildlife Habitat.

- Note that freshwater tidal scrub-shrub wetlands are documented in portions of the project area, along the southern border of the parcels in question. These habitats are considered Habitats of Conservation Concern according to the Delaware Wildlife Action Plan (<http://www.dnrec.delaware.gov/fw/dwap/Pages/default.aspx>), because it is rare in the state and has the potential to harbor a high diversity of Species of Greatest Conservation Need.

Wetland Buffers.

- To protect the function and integrity of wetlands, a minimum 100-foot buffer should be left intact around the perimeter. This recommendation is based on peer reviewed scientific literature that shows an adequately-sized buffer that effectively protects wetlands and streams, in most circumstances, is about 100 feet in width. Upland buffers also serve as habitat for many terrestrial species that are dependent on aquatic and wetlands habitats for a portion of their annual life cycle. Lot lines, roadways, and infrastructure should not be placed within this buffer zone. Buffers are an integral component of aquatic and wetland habitats, reducing the amount of sediments, pollutants, and other non-point source material that may affect the function and integrity of habitat and the condition and survivability of aquatic organisms.

Air Quality.

- DNREC notes that the Wilkerson properties are surrounded by croplands, forests, and wetlands. While the lands of Charles Wilkerson may not be an appropriate location for residential use, it is also likely that any industrial expansion would be incompatible with the topography and resources of the area. These properties are not far removed from the recently finalized Goat Island, which is part of the Mispillion Greenway and is considered an “outdoor classroom” with partnerships from both DNREC and the US Fish and Wildlife Service. DNREC encourages the City to consider the ecological dynamic and tourist appeal of this area before approving Industrial zoning requests.

Mispillion Realty, LLC

Air Quality.

- DNREC notes that there is a mix of uses surrounding the parcel in play: residential, institutional, commercial, and agricultural. Although Old Shawnee Road is an offshoot of Route 113, there is currently no public transportation in the area. Furthermore, Brookstone Trace and the neighboring properties are not designed to facilitate a walkable

or bike-friendly community, despite the wide shoulders along Old Shawnee Road that would suggest an environment for alternative transportation. As Brookstone Trace is expanded, the DAQ encourages the City and the developer to consider adding sidewalks and bike paths and extending these up to Old Shawnee Road. For every vehicle trip that is replaced by the use of a sidewalk or bike path, 7 pounds of VOC and 11.5 pounds of NOx are reduced each year.

Please be advised that the following regulations may apply to this project, should new homes or other structures be constructed on the reclassified parcels:

Table 2: 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>.

Old Armory Building

Air Quality.

- The Comprehensive Plan Amendment indicates that, in accordance with the agreement between the City and the State of Delaware, the City would like to change the zoning of the old Armory Building from Residential to Office Building in order to 1) prevent residential use or acquisition and 2) allow low profile, low traffic professional office use. The City requests to amend the future land use map to reflect the new classification.

DNREC notes that there is an existing DART bus stop within walking distance of the property on North Walnut Street. The stop is served by route 303, which extends from points north in Dover to points south in Georgetown. For every vehicle trip that is replaced by the use of a sidewalk, bike path, or mass transit, 7 pounds of VOC and 11.5 pounds of NOx are reduced each year.

If any building renovation is planned for this project, please be advised that asbestos and other regulations may apply. For a complete listing of all Delaware applicable regulations, please look at our website:
<http://www.awm.delaware.gov/AQM/Pages/AirRegulations.aspx>.

Table 3: 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	<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.

from Consumer and Commercial Products	
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.
Regulation 21 Section 10 – Emission Standards for Hazardous Air Pollutants, Asbestos	<ul style="list-style-type: none"> • Ensure no visible residue of asbestos materials remains in the work area after all asbestos materials are removed in accordance with NESHAP. • Display DANGER signs whenever airborne asbestos may be present in accordance with NESHAP and OSHA • Use wet removal techniques. • Dispose of all asbestos containing waste in clearly labeled sealed containers and store in a secure location awaiting transport to an authorized disposal facility, not to exceed a period of 45 days.

Instructions for Handling Asbestos.

- Please select a Certified Professional Service Firm (CPSF) from the attached list to inspect the facility and sample for Asbestos-Containing Materials (ACM). Once you receive the CPSF report detailing their findings as to how much, what type(s), and the location(s) of the ACM present, you can use that info to fill out the “Notification of Demolition or Renovation” form. If necessary, please select an asbestos abatement contractor from the list, and call to schedule the work to begin three weeks (or more) from the date you mail the form to EPA. When you choose an abatement contractor, please enter the remainder of the required info on the form, to include the name of the Abatement Contractor, name of the Hazmat Hauler who will haul the ACM, and the Hazmat landfill where the ACM will be taken. Once you have completed the form, please make four (4) copies of it, and then send the ORIGINAL to USEPA at the following address:

USEPA Region III
 Attn: Asbestos Coordinator
 1650 Arch Street
 Philadelphia, PA 19103

Send one copy to the DAQ:

DNREC/DAQ
c/o Mr. Thomas Postell
655 S. Bay Rd., Suite 5N
Dover, DE 19901

You must wait a minimum of ten business days after EPA receives your notification, prior to any activity which may disturb asbestos-containing materials (reasoning behind waiting three weeks to begin abatement work). This allows the EPA asbestos inspectors time to coordinate and schedule a site visit if they so desire.

Once the ACM has been abated, a post-abatement inspection by a CPSF asbestos inspector shall be performed to verify that all ACM has been removed.

Following asbestos removal and re-inspection, normal demolition procedures may be employed to complete the demolition process.

State Historic Preservation Office – Contact: Terence Burns 7367404

- There are no known archaeological sites or National Register-listed properties pertaining to the following parcels: the Perdue Real Estate, Amberwood Subdivision, Wilkins Road area, Mispillion Reality, and the City of Milford Armory. However, on lands of Charles Wilkerson, the J. H. Wilkerson and Son Brickworks, which was on the property, but demolished, is in the National Register of Historic Places. With this in mind, there may be archaeological resources, on the parcel that may be associated with that structure.

Therefore, prior to any demolition or ground-disturbing activities, the developer may want to hire an archaeological consultant to examine the parcel for any potential archaeological site or archaeological resources, such as cemetery, burial site, or unmarked human remains. Furthermore, 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

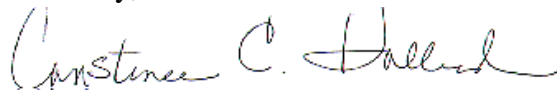
funds. If you need further information or additional details pertaining to the Section 106 process and the Advisory Council's role, please review the Advisory Council's website at www.achp.gov.

Please note that changes to the plan, could result in additional comments from the State. Additionally, the lack of comments reflect only issues that are the responsibility of the agencies represented at the meeting.

Once a decision has been reached on this proposed comprehensive plan amendment, please forward a copy of the plan amendment to the Office of State Planning Coordination for our records. The plan amendment must include a revised version of any maps that were updated as well as any text that was approved in amending the comprehensive plan.

Thank you for the opportunity to review this Comprehensive Plan amendment. 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