



STATE OF DELAWARE
EXECUTIVE DEPARTMENT
OFFICE OF STATE PLANNING COORDINATION

April 20, 2017

Mr. Andrew Collins
Larson Engineering Group, Inc.
910 South Chapel Street, Suite 200
Newark, DE 19713

RE: PLUS review 2017-03-09; South Chapel Street Dunkin Donuts

Dear Andrew,

Thank you for meeting with State agency planners on March 22, 2017 to discuss the South Chapel Street Dunkin Donuts project. According to the information received, you are seeking review of a site plan and rezoning of 1.2 acres from ON to CN in anticipation of the construction of a 2,168 square foot retail food establishment.

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

Code Requirements/Agency Permitting Requirements

Department of Transportation – Contact Bill Brockenbrough 760-2109

- The site access on South Chapel Street (Delaware Route 72) will need to be designed and built in accordance with DelDOT's Development Coordination Manual (formerly the Standards and Regulations for Subdivision Streets and State Highway Access), which is available at

<http://www.deldot.gov/information/business/subdivisions/changes/index.shtml>.

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DelDOT anticipates requiring submission of a preliminary entrance plan as part of the Initial Stage submission to verify prior to issuance of DelDOT's Letter of No Objection to Recordation (LONOR) that the entrance can be constructed within the available right-of-way.

- Pursuant to Section P.3 of the Manual, a Pre-Submittal Meeting will be required before plans are submitted for review. This meeting is scheduled for March 29, 2017.
- Section P.5 of the Manual addresses fees that are assessed for the review of development proposals. DelDOT anticipates collecting the Initial Stage Fee when the record plan is submitted for review and the Construction Stage Fee when construction plans are submitted for review.
- Per Section 2.2.2.1 of the Development Coordination Manual, Traffic Impact Studies (TIS) are warranted for developments generating more than 500 vehicle trip ends per day or 50 vehicle trip ends per hour in any hour of the day. DelDOT calculates that a 2,168 square foot coffee/donut shop with a drive-through window would generate 1,775 vehicle trip ends per day and 218 vehicle trip ends per hour during the weekday morning peak hour. Therefore the TIS volume warrants are met.

Where volumes are low enough, less than 2,000 vehicle trip ends per day and less than 200 vehicle trip ends per hour, DelDOT can allow the applicant to pay an Area Wide Study Fee in lieu of providing a TIS. See Section 2.2.2.2 of the Manual for more information in this regard. The fee, if paid, would be \$10 per vehicle trip end per day and would not relieve the applicant of the responsibility to provide a Traffic Operational Analysis or off-site improvements if DelDOT identifies the need for them in the plan review process. However, based on the peak hour volume, DelDOT cannot accept the fee in lieu in this instance.

To obtain a scope of work for the TIS, the developer's engineer may submit a Meeting Request Form and a Scoping Meeting Information Form, both of which are available under the Forms tab at <http://deldot.gov/information/business/subdivisions/index.shtml>.

- As necessary, in accordance with Section 3.2.5 and Figure 3.2.5-a of the Manual, DelDOT will require dedication of right-of-way along the site's frontage on South Chapel Street. By this regulation, this dedication is to provide a minimum of 30 feet of right-of-way from the outermost edge of the through lane. The following right-of-way dedication note is required, "**An X-foot wide right-of-way is hereby dedicated to the State of Delaware, as per this plat.**"
- In accordance with Section 3.2.5.1.2 of the Manual, DelDOT will require the establishment of a 15-foot wide permanent easement across the property frontage on South Chapel Street. 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.”**

- In accordance with Figure 3.2.5-c of the Manual, sidewalks should have a minimum of a 3-foot grass buffer between the back of curb and the sidewalk.
- As per the Delaware Strategies for State Policies and Spending, this development is in Investment Level 2. Referring to Section 3.5.4.2.A of the Manual, developments in Level 1 and 2 Areas are required to install a sidewalk or Shared Use Path along their frontage. A fee in lieu of construction is acceptable where a physical impossibility exists but DelDOT sees no such impossibility in this instance.
- In accordance with Section 3.8 of the Development Coordination Manual, storm water facilities, excluding filter strips and bioswales, shall be located a minimum of 20 feet from the ultimate State right-of-way along South Chapel Street.
- In accordance with Section 5.2.5.6 of the Manual, a separate turning template plan shall be provided to verify vehicles can safely enter and exit the site entrances. As per Section 5.2.3 of the Manual, the entrances shall be designed for the largest vehicle using the entrance. This plan should address movements between South Chapel Street and the entrances at both ends of the site.
- In accordance with Section 5.14 of the Manual, all existing utilities must be shown on the plan and a utility relocation plan will be required for any utilities that need to be relocated.
- This project is located within the regulated airspace zones of New Castle Airport (ILG), which is a public-use facility. Federal Aviation Regulation (FAR) Part 77 imposes height restrictions on any structures within these zones. DelDOT requires that the applicant for this project submits a “Proposed Construction/Alteration in Airport Zones Notification Form” in accordance with Delaware Code (2 Del. C. § 602).

This notification form can be submitted during the plan approval process with the local land use jurisdiction, but DelDOT’s Office of Aeronautics is willing to test hypothetical height numbers to prevent any future project complications. Please contact Josh Thomas with the Office of Aeronautics at (302) 760-4834 with any questions or concerns. A copy of the notification form can be found at this address:

http://www.deldot.gov/information/community_programs_and_services/airports/pdfs/aviation_obstruction_review_form.pdf

Department of Natural Resources and Environmental Control – Contact Michael Tholstrup 735-3352

Executive Summary.

Development of this parcel will result in increased impervious surface and new sources of greenhouse gas emissions. Opportunities exist to reducing the environmental impact on-site. As discussed at the PLUS meeting, the Department recommends working with the New Castle County Land Use Department in reviewing the source water protection ordinance in the Unified Development Code.

The State of Delaware is threatened by climate change and has a goal of reducing greenhouse gas emissions by 30 percent by 2030. Appropriate development and re-development that provides access to public transportation, opportunities to walk and bike to shopping and recreation, and that employs energy efficient building standards are among key strategies to meet these goals. DNREC encourage the use of high performance building standards and consideration of alternative energy sources to promote clean sustainable energy and reduce greenhouse gas emissions. This could mean siting the buildings to take advantage of solar and geothermal systems, and/or including infrastructure for electric vehicle charging stations (funding assistance may be found at www.de.gov/cleantransportation). DNREC further recommend an abundant use of native vegetation and shade trees throughout the landscape,.

The following pages provide information about applicable regulations and detailed recommendations associated with this project, from various DNREC Divisions. DNREC would like to be a partner in creating appropriate development that protects and highlights the environment as a natural amenity of the landscape. The Department has resources and expertise that are available to help make this a reality, often at no expense to the landowner.

Water Quality and TMDLs.

- This project is located in the greater Piedmont drainage area, specifically within the greater Christina River Basin. In the Christina River Basin, post-development nitrogen and phosphorus loading must be capped at the pre-development or baseline loading rate (or a 0% post-construction increase in Delaware's portion of the Christina River Basin) to meet the required Total Maximum Daily Loads (TMDLs) for each nutrient. Moreover, reductions in bacteria that range from 29 percent to 95 percent (High Flow) is also required (depending upon location). TMDLs for nitrogen, phosphorus, and bacteria have been promulgated through regulation in most of the State of Delaware's water bodies. A TMDL is the maximum level of pollution allowed for a given pollutant below which a "water quality limited waterbody" can assimilate and still meet State water quality standards (e.g., dissolved oxygen, nutrients, and bacteria; *State of Delaware Surface Water Quality Standards, as amended July 11, 2004*) to the extent necessary to support use goals such as, swimming, fishing, drinking water and shell fish harvesting. TMDLs are required by federal law (Section 303(d) of the 1972 Clean Water Act), and the states are charged with developing and implementing specific land use practices that support these goals. The specific required nutrient and bacterial requirements for the various stream segments in the Basin, and background information is outlined in the report

entitled “*Christina River Basin High Flow TMDL*” by the EPA. This report can be retrieved here: <http://www.dnrec.delaware.gov/swc/wa/Pages/WatershedAssessmentTMDLs.aspx>

Source Water Protection.

- DNREC has determined that the entire project falls within Level 2 Source Water Protection Area (Christina River) for New Castle County. In addition, the entire project falls within a wellhead protection area for the City of Newark’s public water system (see map).

Level 2 Source Water Protection Areas are the delineated watershed upstream from a surface water intake that supplies water to a drinking water system. Land use or land activity within this area has the potential to influence water quality or quantity to the public drinking water system.

Wellhead protection areas are surface and subsurface areas surrounding a public water supply well where land use activities or impervious cover may adversely affect the quantity and quality of ground water moving toward such wells.

In addition, because the wellhead protection area is an existing source of public drinking water and the excellent ground-water recharge area so readily affects the underlying aquifer, the storage of hazardous substances or wastes should not be allowed within these areas unless specific approval is obtained from the relevant state, federal, or local program.

DNREC recommends referring to NCC Unified Development Code for regulations regarding development in these areas.

Water Supply.

- 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 four weeks to process, which allows the necessary time for technical review and advertising.
- A potential contamination source exists in the area, and any well permit applications will undergo a detailed review that may increase turnaround time and may require site specific conditions/recommendations:
 - Underground Storage Tank site: Exxon #27249 Castle Mall located within 1000 feet of the proposed project.

Sediment and Erosion Control/Stormwater Management.

- A detailed sediment and stormwater plan will be required prior to any land disturbing activity taking place on the site. Contact the reviewing agency to schedule a pre-application meeting to discuss the sediment and erosion control and stormwater management components of the plan. The site topography, soils mapping, pre- and post-development runoff, and proposed method(s) and location(s) of stormwater management should be brought to the meeting for discussion. The plan review and approval as well as construction inspection will be coordinated through the New Castle County Department of Land Use Engineering Section. Contact the Department of Land Use at (302) 395-5470 for details regarding submittal requirements and fees.

Air Quality.

- The applicant shall comply with all applicable Delaware air quality regulations. Please note that the following construction phase 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 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>

Tank Management.

- 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.
- 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 (800) 662-8802; and
 - The DNREC Tank Management Section (302) 395-2500.

State Historic Preservation Office – Contact Terrence Burns 736-7404

- There is no known archaeological site or National Register listed property on this parcel. If any project or development proceeds, be aware of the Unmarked Human Burials and Human Skeletal Remains Law, in Chapter 54 of Title 7, of the Delaware Code.
- 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 (Del. C. Title 7, Ch. 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 see more information, please review the following websites: 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 hire an archaeological consultant, to examine the parcel for archaeological resources and plan to avoid those sites or areas.

- If there is federal involvement, 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 the following: www.achp.gov.

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 be advised that all new plan submittals and re-submittals, including major, minor and commercial plans, shall now be uploaded via the PDCA (Planning Development Coordination Application) with any review fee paid online via credit card or electronic check. Guidance on how to do this is available on our website at <http://www.deldot.gov/information/business/subdivisions/>
- The subject plan assumes access to the south through an adjacent parcel (Tax Parcel No. 1100610143), which is presently owned by a related company. DelDOT anticipates requiring the developer to obtain, and show on the plan, a cross-access easement ensuring continued access to South Chapel Street through Tax Parcel No.1100610143. DelDOT also anticipates requiring the developer to provide a cross-access easement in favor of Tax Parcel No.1100610143, ensuring access through the subject land to Kenmar Drive and the signalized intersection of South Chapel Street and Kenmar Drive.

- Be advised that the Standard General Notes have been updated and posted to the DelDOT website. Please begin using the new versions and look for the revision date of August 31, 2016. The notes can be found at http://www.deldot.gov/information/business/subdivisions/2016/Sheet_Notes.doc?083116

Department of Natural Resources and Environmental Control – Contact Michael Tholstrup 735-3352

Soils Assessment.

- Based on the soils survey mapping update, the primary soil mapping mapped on subject parcel is Urban Land (Up). Urban Land has been extensively modified by filling and grading practices and no longer has any specific features that can define its' suitability for development.

Additional information on TMDLs and water quality.

- Pollution Control Strategy (PCS): Although a Pollution Control Strategy (PCS) to achieve the required TMDL nutrient and bacterial load reduction requirements has been established for the Christina Basin, attainment of the load reduction(s) is hampered by circumstance that the strategies for this watershed are entirely voluntary in nature. The web link for the Christina watershed PCS strategies is as follows: <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, which would:
 - Provide additional native tree, shrub and/or native herbaceous vegetation plantings in areas of open space, wherever possible.
 - 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, ponds, and roads) included in the calculation for surface imperviousness. Omission of any of the above-stated forms of surface imperviousness will result in an underestimate of the actual post-development surface imperviousness, and the environmental impacts associated with that imperviousness.
 - Employ green-technology storm water management and a rain garden(s) (in lieu of open-water management structures) as BMPs to mitigate or reduce nutrient and bacterial pollutant runoff.
 - Use pervious paving materials (when compatible or consistent with water quality concerns in areas of excellent recharge/ well-head protection areas as determined by DNREC hydrogeologist(s)) instead of conventional paving materials (e.g., asphalt or concrete) - wherever possible - to help reduce the

amount of water and pollutant runoff draining to adjoining streams and wetlands in the greater Christina River Basin. Pervious pavers are especially recommended for commercial areas – such as this project – with a significant portion of the project area designated for parking.

- 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) resulting from the conversion of individual or combined land parcels to a changed land use(s); thus providing applicants and governmental entities with quantitative information about the project’s impact(s) on baseline water quality. DNREC strongly encourage the applicant/developer use this protocol to help them design and implement the most effective BMPs. Please contact John Martin (Division of Watershed Stewardship) at 302-739-9939 for more information on the protocol.

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. For more information, please visit online: <http://www.dnrec.delaware.gov/tanks/Pages/default.aspx>

Additional information on air quality.

- New Castle County is currently designated as nonattainment for the 2008 ozone National Ambient Air Quality Standards (NAAQS) and is considered maintenance for the particulate matter (PM) standard. These negative impacts are attributable to:
 - Emissions that form ozone and fine particulate matter;
 - The emission of greenhouse gases which are associated with climate change, and
 - The emission of air toxics.
- Based on the information provided, mobile source emissions were quantified. Table 2 – Projected Air Quality Emissions represents the potential impact the South Chapel Street Dunkin Donuts project may have on air quality.

Table 2: Projected Air Quality Emissions for South Chapel Street Dunkin Donuts (Based on projected estimate of 1,710 trips during peak season)					
Emissions Attributable to South Chapel Street Dunkin Donuts (Tons per Year)	Volatile Organic Compounds (VOC)	Nitrogen Oxides (NOx)	Sulfur Dioxide (SO ₂)	Fine Particulate Matter (PM _{2.5})	Carbon Dioxide (CO ₂)
	5.67		*	*	*

Mobile emissions		7.48			
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Note that emissions associated with the actual construction of the commercial dining building, including automobile and truck traffic from working in, or delivering products to the site, as well as site preparation, earth moving activities, road paving and other miscellaneous air emissions, are not reflected in the table above.

- **Native Tree Plantings:** To offset the impact of the subdivision on the surrounding area, the applicant is encouraged to make every attempt to preserve as many natural trees as possible and add tree plantings in common areas. Trees can significantly reduce automobile emissions including air pollutants (NOx, VOCs, and particulate matter) by trapping gas fumes and replenishing the oxygen into the ambient air. In addition, trees also reduce the effects of heat islands by helping to cool asphalt and pavement which also lessens the chances of ozone formation. Such measures can be used to channel or infiltrate storm water. They also have the added benefit of creating an urban tree canopy that provides shade for parking areas as well as reduces home cooling costs.
- **Energy Efficiency:** Constructing with only energy efficient products can help your facility immensely, not only in terms of environmental sustainability but financially. Energy Star qualified products are up to 30 percent 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. Providing shade for parking areas can also be of added benefit to this facility. Some approaches may include architectural devices, vegetation, or solar panels. For more about energy efficient options, please see: <https://www.energystar.gov/> or <https://www.epa.gov/greeningepa/energy-efficiency-epa>.
- **Multi-modal travel:** A component of improving existing air quality levels is to maximize multi-modal travel through bike lanes, sidewalks and convenient access to transit opportunities. DNREC encourages the developer to improve its existing sidewalks and crosswalks and to add sharrows or bike lanes where needed to encourage multi-modal travel opportunities. Sharrows and striping are the easiest and most cost effective option. Multi-modal travel can significantly reduce mobile source emissions. 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.
- **Clean Fuel Measures:** This measure helps to reduce localized air pollution by supporting the use of clean vehicles. It is recommended that at least one parking spot be allotted for the use of alternative fueled vehicle parking and/or charging.

According to the EPA's Office of Transportation and Air Quality, the average passenger car emits 10,034.28 lbs. of cumulative emissions reduction of per year.

For a site map of local alternative fueling sites, please visit the Alternative Fuels Data Center website here: <http://www.afdc.energy.gov/locator/stations/>.

- Should the developer have any more questions or concerns, the DNREC Division of Air Quality (DAQ) point of contact is Lauren DeVore, and she may be reached at (302) 739-9437 or lauren.devore@state.de.us. The applicant is encouraged contact DAQ to discuss the emission mitigation measures that will be incorporated into the Dunkin Donuts project. DNREC look forward to working together with you on this project to achieve our shared air quality, healthy community and quality of life goals.

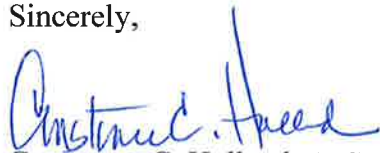
Delaware State Fire Marshall's Office – Contact John Rudd 739-4394

- Preliminary meetings with fire protection specialists are encouraged prior to formal submittal. It is reported that a meeting has already occurred with staff at the State Fire Marshal's Office.

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