



STATE OF DELAWARE
EXECUTIVE DEPARTMENT
OFFICE OF STATE PLANNING COORDINATION

March 28, 2018

James Taylor
5400 Limestone Road
Wilmington, DE 19808

RE: PLUS review 2018-02-02, Dover Shopping Center & Apartment Complex

Dear James,

Thank you for meeting with State agency planners on February 28, 2018 to discuss the Dover Shopping Center & Apartment Complex project. According to the information received, you are seeking a review of a site plan for 76,570 square feet of commercial space and a 240 unit apartment complex on 25.01 acres along Rt. 13 in Dover.

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 the City of Dover is the governing authority over this land, the developers will need to comply with any and all regulations/restrictions set forth by the City.**

Strategies for State Policies and Spending

- This project is located in Investment Level 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. Thus, the Office of State Planning Coordination has no objections to this development.

Code Requirements/Agency Permitting Requirements

Department of Transportation – Contact Bill Brockenbrough 760-2109

- The site access on US Route 13 and Leipsic Road (Kent Road 88) must be designed in accordance with DelDOT's Development Coordination Manual. A copy of the Manual is available at <https://www.deldot.gov/Business/subdivisions/index.shtml?dc=changes>.

- Pursuant to Section P.3 of the Manual, a Pre-Submittal Meeting is required before plans are submitted for review. The form needed to request this meeting and guidance on what will be covered there and how to prepare for it is located at https://www.deldot.gov/Business/subdivisions/pdfs/Meeting_Request_Form.pdf?08022017.
- 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 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. From the PLUS application, the total daily trips are estimated at 5,449 vehicle trip ends per day. Therefore a TIS is warranted for this development.

Presently, in accordance with Section 2.4 of the Manual, DelDOT is working with the City of Dover to create a Transportation Improvement District (TID) in the US 13/Bay Road Corridor. When the District is fully established, the developer would have the option of paying a fee in lieu of doing a TIS and off-site improvements based on that study. With that said, DelDOT does not have a projected date for establishment of the TID. DelDOT recommends that the applicant have their traffic engineer request a TIS scoping meeting when they ready to proceed with a TIS. The required Scoping Meeting Information Form is available at <https://www.deldot.gov/Business/subdivisions/pdfs/AppendixO.pdf>.

- 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 US Route 13 and Leipsic Road. By this regulation, this dedication is to provide a minimum of 30 feet from the outermost edge of the through lanes on US Route 13 and 40 feet from the physical centerline of Leipsic Road. 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 both US Route 13 and Leipsic Road. 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 Section 3.5.4.2.A.3 of the Manual, DelDOT will require construction of a sidewalk or Shared Use Path along the property frontage on both US Route 13 and Leipsic Road.
- In accordance with Section 5.2.9 of the Manual, the Auxiliary Lane Worksheet should be used to determine whether auxiliary lanes are warranted at the site entrances and how long

those lanes should be. The worksheet can be found at http://www.deldot.gov/information/business/subdivisions/auxiliary_lane_worksheet.xls.

- 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.

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 protect and preserve water resources and reduce the environmental impact of development, on-site. As discussed at the PLUS meeting, the Department recommends appropriate consideration of source water protections to protect the overall health of the community. Also, avoiding development on hydric soils and including waste reduction and resource conservation measures will improve long term regional sustainability.

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 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 encourages 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 recommends an abundant use of native vegetation and shade trees throughout the landscape, as well as green infrastructure, where practicable, to absorb carbon dioxide, protect water quality and provide relief to residents on hot days.

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.

Source Water Protection.

- DNREC has determined that the entire project falls within an area of excellent ground-water recharge potential for the City of Dover.

Excellent Ground-Water Recharge Areas are those areas mapped by the Delaware Geological Survey where the first 20 feet of subsurface soils and geologic materials are exceptionally sandy. These soils 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.

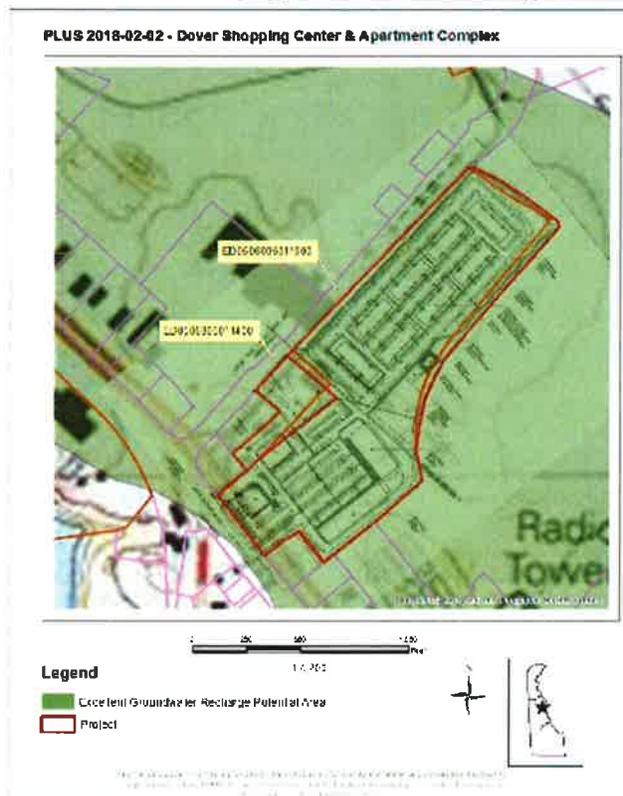
The City of Dover has a source water ordinance in place with conditions for development within areas of excellent groundwater recharge potential. Section 29.7 regulates development in areas of excellent recharge. The Section requires reduction of impervious surfaces for redevelopment and limits impervious cover for new construction. This project does not appear to meet the requirements of the City of Dover's Source Water Protection Overlay Zone requirements.

- DNREC recommends review by the City of Dover and adherence to the City of Dover's Source Water Protection Overlay Zone requirements.
- In addition, because the excellent ground water recharge area can readily 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.

References:

Andres, A. Scott, 2004, Ground-Water Recharge Potential Mapping in Kent and Sussex Counties, Delaware: Delaware Geological Survey Report of Investigations No. 66, p. 14.

<http://www.udel.edu/dgs/Publications/pubform.html#investigations>



Water Quality: TMDLs.

- The project is located in the greater Delaware River and Bay drainage area, specifically within the St. Jones and Leipsic River watersheds. 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) for both watersheds. 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. The nutrient TMDL for the St. Jones River & Leipsic River watersheds call for a 40 percent reduction in nitrogen and phosphorus from baseline conditions. The TMDL also calls for a 90 percent and 75 percent reduction in bacteria from baseline conditions in the St. Jones and Leipsic River watersheds, respectively. Information about the TMDL nutrient and bacterial load for these watersheds can be viewed here: <http://www.dnrec.delaware.gov/swc/wa/Pages/WatershedAssessmentTMDLs.aspx>
- A nutrient management plan is required under the *Delaware Nutrient Management Law* (3 *Del.C.*, 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 (302) 739-4811 for further information concerning compliance requirements, or view additional information here: <http://dda.delaware.gov/nutrients/index.shtml>

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.
- Potential Contamination Sources exist 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. In this case, there are (2) Underground Storage Tank sites associated with:
 - Dover Amoco,
 - Sunoco,

There is (1) Leaking Underground Storage Tank site located within 1,000 feet of the proposed project, associated with:

- Dover Pizza Hut,

Should you have any questions concerning these comments, please contact Rick Rios, at (302) 739-9944.

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 Kent Conservation District. Contact Jared Adkins, Program Manager, at (302) 741-2600, ext. 3, 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 regulations in Table 1 – Potential Regulatory Requirements may apply to your project.

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 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>.

Recycling.

- Delaware Law (7 *Del.C.*, §6053) and Regulations (7 *Del. Admin. C.* §1305) specify that the ‘commercial sector’ shall participate in a comprehensive recycling program. As such, all those involved with the planning of the facilities should allocate space for collection

of recyclables that would be typically generated. For example, space for a recycling dumpster should be provided adjacent to each trash dumpster.

- The Universal Recycling Law (7 *Del.C.*, §6053) and Regulations (7 *Del. Admin. C.* §1305) require all waste service providers to provide recycling collection to their residential customers including multi-family residential settings. Property owners/managers must provide information to residents and help facilitate services. Every trash dumpster should have an adjacent recycling dumpster. Those involved with the planning of new facilities should allocate space for collection of recyclables.
- For more information or assistance related to recycling requirements, benefits, tools, and assistance please call Don Long, at (302) 739-9403.

State Historic Preservation Office – Contact Terrence Burns 736-7404

- There are no known archaeological sites, or known National Register-listed or eligible properties on the parcel. If any project or development proceeds, the developer should be aware of the Unmarked Human Burials and Human Skeletal Remains Law. Prior to any demolition or ground-disturbing activities, the developer should hire an archaeological consultant to examine the parcel for archaeological resources, including unmarked human burials or human skeletal remains, to avoid those sites or areas.
- Abandoned or unmarked family cemeteries are very common in the State of Delaware. They are usually in rural or open space areas, within or near the boundary, of a 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.
- 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

- Preliminarily, the right-turn-only access proposed near the proposed restaurant will not be permitted. The same movement would be served by a proposed access about 300 feet to the south and, less directly, by Leipsic Road about 350 feet to the north. DelDOT acknowledges that there is an existing right turn into a Pizza Hut restaurant even closer to Leipsic Road. DelDOT seeks to close that access in the future if possible and anticipates, in accordance with Section 3.5.7.4 of the Manual, requiring a cross-access easement such that the Pizza Hut parcel (Tax Parcel No. 2-05-068.05-01-10.00-00001) could be accessed through the subject development if the Pizza Hut parcel is ever redeveloped.
- Again referring to Section 3.5.7.4 of the Manual, DelDOT anticipates requiring cross access easements to the adjoining parcels presently occupied by the Speedway Café and Cash Point Car Title Loans, respectively Tax Parcel Nos. 2-05-068.05-01-13.01-00001 and 2-05-068.09001-08.00-00001.
- Section 3.5.4.3 of the Manual addresses DelDOT standards for walkways interior to developments other than residential subdivisions. DelDOT recommends generally that these standards be followed and specifically that a crosswalk be provided across the Private Drive that would separate the existing hotel and the proposed shopping center from the proposed apartments. The crosswalk would facilitate access between the apartments and the proposed shopping center.
- The applicant should expect a requirement that all PLUS and Technical Advisory Committee (TAC) comments be addressed prior to submitting plans for review.

- Please be advised that as of August 1, 2015, 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 <https://www.deldot.gov/Business/subdivisions/index.shtml>.
- Please 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 December 8, 2017. The notes can be found at <https://www.deldot.gov/Business/subdivisions/index.shtml>.

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

Additional information on recycling and reducing water use.

- Materials and resources utilized for new development should be considered, including regionally available recycled content (i.e. carpet, concrete, countertops, furniture, siding, etc.), rapidly renewable material and certified woods.
- Construction Waste Management should include policies which promote efficient material use and recycling of project debris.
- Employ systems and appliances that increase water efficiency and reduce water use.
 - Low-flow and high-efficiency items
 - Waterless urinals
 - graywater recycling systems
 - Rainwater catchment

Additional information on TMDLs and water quality.

- A Pollution Control Strategy (PCS) to achieve the required TMDL nutrient and bacterial load reduction requirements has been established for the St. Jones watershed. Although PCS strategies for the Leipsic River watershed have not been developed to date, the PCS strategies for the St. Jones watershed can be viewed here: <http://www.dnrec.delaware.gov/swc/wa/Pages/WatershedManagementPlans.aspx>

In support of the PCS, the applicant is strongly urged to reduce nutrient and bacterial pollutants through voluntary commitment to the implementation of the following recommended best management practices:

- Maintain as much of the existing open space as possible in this parcel. DNREC further suggests additional native tree, shrub and/or native herbaceous vegetation plantings in available open space, wherever possible.
- 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; thus providing applicants and governmental entities with quantitative information about the project’s impact(s) on baseline water quality. DNREC strongly encourages the applicant/developer use this protocol to design and implement the most effective best management practices. Please contact John Martin of the DNREC Division of Watershed Stewardship, at (302) 739-9939 for more information on the protocol.

Additional information on air quality.

- New homes may emit, or cause to be emitted, additional air contaminants into Delaware’s air, which will negatively impact public health, safety and welfare. Air emissions generated from new homes include emissions from the following activities:
 - Area sources such as painting, maintenance equipment and the use of consumer products like roof coatings and roof primers.
 - The generation of electricity, and
 - All transportation activity.

- Based on the information provided, mobile source emissions for the project were quantified. Table 2 represents the potential impact the Dover Shopping Center and Apartment Complex project may have on air quality.

Emissions Attributable to Dover Shopping Center and Apartment Complex (Based on Average Annual Daily Traffic (AADT) of 5,449 vehicle trips per day)	Volatile Organic Compounds (VOC)	Nitrogen Oxides (NOx)	Sulfur Dioxide (SO ₂)	Fine Particulate Matter (PM _{2.5})	Carbon Dioxide (CO ₂)
Mobile emissions	18.09	23.86	*	*	*

(*) Indicates data is not available.

Note that emissions associated with the actual construction of the Dover Shopping Center and Apartment Complex, including automobile emissions from traffic and from the Dover International Speedway and truck traffic from working in, or delivering products to or from the site, as well as site preparation, earth moving activities, road paving and other miscellaneous air emissions are not reflected in the table above.

- Site/Project-Specific Recommendations:

- Planting of native shade trees to clean the air of localized pollutants and cut down on residential energy/cooling costs.
 - The use of reclaimed asphalt pavement (RAP), which reduces heat island effects on paved surfaces, reduces landfill waste, is a sustainable pavement and more economically feasible than other pavement types.
 - Use only the minimum number of parking spaces to reduce the amount of impervious surface cover.
 - Use of energy efficient products in construction to lessen the power source emissions of the project and costs.
 - Electric vehicle charging in common areas to facilitate the expansion of a clean fuel infrastructure.
 - Expansion of the bicycle/pedestrian network through sidewalks, bike lanes and racks which promote alternative forms of transportation. According to the DelDOT Gateway application, this project has an opportunity to connect to a statewide bicycle route off of Dover/Leipsic Road.
 - Expansion of the transit network in order to facilitate transit service to the new development.
 - Beautification and landscaping to generate a context-sensitive design that would blend in well with surrounding land uses while also helping to mitigate the pollution potential of the project.
- **Tree Buffer or Canopy:** Some green streetscape elements that the Dover Shopping Center and Apartment Complex could incorporate area tree buffer or expansion of the City of Dover's tree canopy. According to the Delaware Forest Service, in 2014, Dover's urban tree canopy was 25.7 percent (3,844.6 acres).

Native, low VOC emitting trees reduce emissions by trapping dust particles and replenishing oxygen. Every effort should be made to ensure as many existing, native trees are preserved as possible. 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.

All urban trees that are selected should be native to Delaware and preferably low VOC emitting trees. Every tree has a different biogenic emissions rate by which they release VOC's into our atmosphere. As a general rule, the best trees to plant are those that have a large leaf surface area at maturity, contain leaf characteristics that are amenable to particle collection from particulate matter (PM) such as those that have hairy or sticky leaves and have high transpiration rates which result in relatively high temperature reduction.

- **Energy Efficient Options:** Constructing with only energy efficient products can help your housing units and commercial space 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 as well as third-party certifications and building materials (i.e. LEED, Greenseal, EcoLogo). Every percentage of energy efficiency translates into a percent reduction in pollution.

Economic benefits include:

- Reduced operating costs
- Enhanced asset value and profits
- Enhanced occupant comfort and health
- Improved air, thermal, and acoustic environments

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. 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 storm water. 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 and sidewalks. DNREC was pleased to see sidewalks are included in the future development. DNREC encourages the developer to include 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. According to the DelDOT Gateway application, there is also an opportunity to connect to a statewide bicycle route off of Dover Leipsic Road in Dover. Please see the following link for more details: <http://deldot.maps.arcgis.com/apps/webappviewer/index.html?id=c33fdabe66be4f9799bceb92da5900ba>. 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 NO_x are reduced each year.

Also, for more information on the impacts of multimodal access on air quality please see the EPA's website at: <https://www3.epa.gov/otaq/>.

- Transit Expansion: Transit services are a vital component in addressing transportation equity as well as air quality impacts. Transit's inclusion as a viable transportation option reduces greenhouse gas (GHG) emissions by assisting in compact development (transit-oriented development), conserving land and also reduces congestion by taking single occupancy vehicles off of the road.

The future development lies along a Bus Route off of Leipsic Road, Bus Route 108 inbound and outbound. It is recommended that transit be utilized for this community. For more information on DART bus routes in your area, please see: www.dartfirststate.com and visit the "Bus Stop Map" application.

- **Electric Vehicle Charging Expansion:** The developer is recommended to include Electric Vehicle Supply Equipment (EVSE)/ charging where feasible in common areas. For example, near the clubhouse or near the pedestrian islands in the shopping center. Incorporating electric vehicle charging capabilities in homes could also be marketed as a unique selling feature while also accommodating Delaware's clean transportation goals.

For more information on this subject and what charging to make available please visit the following link: <https://www.chevyevlife.com/bolt-ev-charging-guide/>

Electric Vehicle Charging (EVSE) Expansion: Include electric vehicle supply equipment (ESVE)/ charging infrastructure where feasible, particularly in common areas.

Incorporating electric vehicle charging capabilities in common parking areas and homes could also be marketed as a unique amenity while also accommodating Delaware's clean transportation goals. More information can be viewed here: DE.Gov/cleantransportation

- **Development Beautification:** The developer is encouraged to beautify the development site with landscaping that would not only make the subdivision more attractive but also help to clean the air of any pollutants that could be emitted or transported by sources around the development area such as pollutants from mobile sources, construction or neighboring activities. This would reduce air quality impacts on residents while also incorporating a context-sensitive design that blends well with the surrounding development and existing land uses.
- The overall project enhancements will create valued upgrades to the existing community and add air quality benefits. 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 to contact DAQ to discuss any emission mitigation measures that will be incorporated into the Dover Shopping Center and Apartment Complex project. DNREC looks forward to working together with you on this project to achieve our shared air quality goals.

Soils Assessment.

- Based on soils survey mapping update, the primary soil mapping unit of concern in this parcel is Fallsington (FgA). Fallsington is a poorly-drained wetland associated (hydric) soil mapping unit that has severe limitations for development and should be avoided (i.e., considered unsuitable for development; Figure 1).

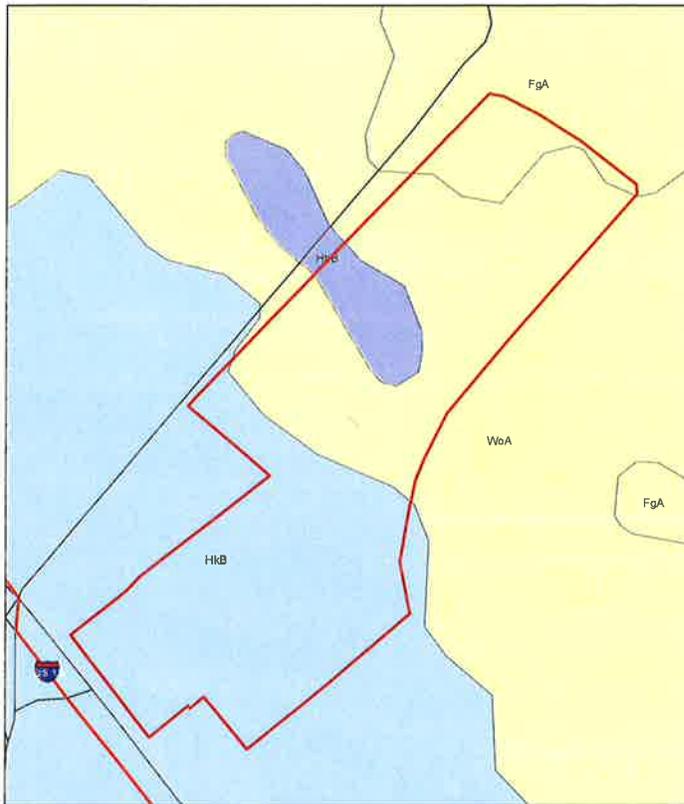
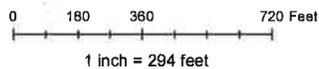


Figure 1: NRCS soil survey mapping update in the immediate vicinity of the proposed construction



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: Kent County
City of Dover