



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

April 20, 2018

Dave Hugg  
City of Dover  
Department of Planning & Inspections  
15 Lookerman Plaza  
P.O. Box 475  
Dover, DE 19903

RE: PLUS review 2018-03-01; City of Dover Comprehensive Plan Pre-Update

Dear Dave:

Thank you for meeting with State agency planners on March 28, 2018 to discuss the Pre-Update review of the City of Dover's Comprehensive plan. State agencies have reviewed the documents submitted and offer the following comments. We hope that these comments and recommendations assist the City as the Plan Update is being prepared. Additionally, these comments reflect only issues that are the responsibility of the agencies represented at the meeting.

***Certification Comments:*** These comments must be addressed in order for our office to consider the plan update consistent with the requirements of Title 22, § 702 and Title 29, § 9103 of the Del. Code.

- The Office of State Planning Coordination has developed a Comprehensive Plan Checklist based on the requirements found in Title 22, § 702 of Delaware Code. The checklist can be downloaded from our website here: <http://stateplanning.delaware.gov/docs/comprehensive-plan-checklist-guide.pdf>.
- The City of Dover has a population of greater than 2,000 persons. As such, the following requirements must be included in the updated comprehensive plan to be considered for certification: clearly articulated positions on population growth, housing growth, expansion of boundaries, development of adjacent areas, redevelopment potential, community character, general use of land, critical community development infrastructure and key infrastructure issues. Demonstration of coordination with State, County and other municipalities is also required for certification. In Dover's case, the City must

demonstrate coordination with Kent County and the towns of Camden and Wyoming at a minimum. In addition, the plan must describe the physical, demographic and economic conditions and contain policies, statements, goals and planning components addressing land use, transportation, economic development, affordable housing, community facilities, open space and recreation, protection of sensitive areas, community design, water and wastewater systems, protection of historical and cultural resources, annexation and any other elements which the community feels will best promote health, safety, prosperity and general welfare.

**Recommendations:** Our office strongly recommends that the Town consider these recommendations from the various State agencies as you review your plan for final approval.

**Office of State Planning Coordination – Contact: David Edgell 739-3090**

- Based on the discussion at the PLUS meeting, our understanding is that the City intends to update the current plan document. The current document is a very well organized and detailed comprehensive plan that met all of the certification requirements when it was originally written. The document should be a good foundation to work from.
- There have been (at least) seven Plan Amendments adopted to into the 2009 Dover Comprehensive Plan, as well as several “minor variations” as per our PLUS MOU. It is recommended that the Plan Update integrate the information contained into these amendments into the plan document, to the extent the information is still relevant and desired by the community.
- In addition to addressing all of the Certification requirements, it is recommended that the updated comprehensive plan address any additional planning issues that are important to the City.
- Please be aware that Kent County is currently updating the County’s comprehensive plan. It is recommended that the City provide input through the County’s plan update process in regards to future land use, growth and infrastructure issues surrounding the City. The City’s vision for the “development of adjacent areas” and “expansion of boundaries” should be discussed with the County as they develop their plan. Please contact the Kent County Department of Planning Services directly for information regarding their plan update schedule and opportunities for the City to provide input.
- Please be aware that the Town of Camden is in the process of drafting their comprehensive plan. It is recommended that the City provide input through the Town’s plan update process in regards to and future land use, growth or infrastructure issues that may concern both jurisdictions.
- There are some annexation areas in the City of Dover plan and the 2011 Town of Wyoming plan that overlap. These areas are identified as “areas of common interest.” It

is recommended that Dover and Wyoming coordinate to ensure harmony between the two annexation plans. These areas overlap at this point in time. When both plans were previously adopted and certified there was an understanding that both municipalities would work together should development be proposed and agree upon utilities and annexation at that time. The agreement regarding these properties should be revisited and updated as a part of Dover's comp plan update process. Please note that should there be any question regarding the agreement and future collaboration between the two jurisdictions it may be considered a "Certification Issue" and the OSPC will engage both communities on a resolution to this issue prior to the plan being considered for certification.

### **Department of Transportation – Contact Bill Brockenbrough 760-2109**

- The State Scenic and Historic Highways Program, addressed on page 60 of the 2008 Plan has changed significantly and there is now a State Scenic and Historic Byway traversing the city. This route is the Harriet Tubman Underground Railroad Byway. The Green is a key location and contributing hub of this byway and a tourist destination. Each municipality has treated byways differently, but the presence of the byway, and potential planning measures to address it should be included in the new Plan.
  - If the structure of the 2008 Plan is retained, Chapter 6, Historic Preservation, would be the first logical place to address the Harriet Tubman Underground Railroad Byway and also the Delaware Bayshore Byway (referenced in the 2008 Plan as the Route 9 Coastal Heritage Highway). Chapter 9, Transportation, is another logical place and DelDOT would recommend that both chapters at least mention the byway(s) and refer to the other chapter as appropriate. DelDOT recommends that future transportation plans and possible transportation objectives and preservation goals should be included in the Plan with reference to similar transportation or preservation goals under the byway's Corridor Management Program, i.e. the byway's own comprehensive plan.
  - For information and assistance in more fully incorporating the byways into the Plan, DelDOT recommends that the County contact Mr. Michael Hahn, Byways Coordinator, in DelDOT's Local Systems Improvement Section. Mr. Hahn may be reached at (302) 760-2131 or at [MichaelC.Hahn@state.de.us](mailto:MichaelC.Hahn@state.de.us). A smart map of all of Delaware's byways, including this one, is available at <http://deldot.maps.arcgis.com/apps/webappviewer/index.html?id=03d5049bc49041658cfecad5fd6ba8b9>.
- On page 92, the 2008 Plan discusses truck travel. While it may still be too early to quantify the effects, DelDOT expects the recently completed POW/MIA Parkway (discussed in the 2008 Plan as the West Dover Connector) to make a significant difference for truck traffic on the west side of the city. Completion of the road should be reflected in the new Plan.

- On page 94, the 2008 Plan discusses pedestrians and bicycle facilities. Since 2008, the City has made significant progress in this area and has more projects planned. The new plan should discuss the City's accomplishments and plans, citing specific projects where possible.
- On page 95, the 2008 Plan describes the Delaware Airpark as being owned by the State. It is owned by the Delaware River and Bay Authority.
- DelDOT offers several comments on the Roadway Systems section, on pages 95 through 97 of the 2008 Plan:
  - The first paragraph on page 96 begins "The roadways in the City range in character from four-lane highways to local streets." From Scarborough Road to Bay Road, US 13 has six lanes.
  - Also on page 96, there is recognition of the need, at that time, to align the City's functional classification system with the Federal Highway Administration's (FHWA) system. Regardless of whether that work has been done, the City should be aware that the FHWA system changes over time. DelDOT recommends that the City periodically contact Mr. Kevin Gustafson in their Decision and Data Support Section to verify that their system current and to update it as necessary. If that is not presently being done, this Plan update would be a good occasion to do so. Mr. Gustafson may be reached at (302) 760-2142 or [Kevin.Gustafson@state.de.us](mailto:Kevin.Gustafson@state.de.us).
  - Further to the point just mentioned, elsewhere on page 96, US Route 113 is listed among Dover's principal arterials. Historically, that was correct but for some time US Route 113 has begun at Milford and extended south from there. The change was made in response to reports that signing Bay Road and a section of Delaware Route 1 as US Route 113 was confusing drivers.
- The Transportation Goals section of the 2008 Plan includes, in Table 9-6, a prioritized list of 11 transportation projects that the City wanted DelDOT to pursue. The top two items on that list, i.e. the bus station and POW/MIA Parkway are now complete. The list and the supporting text that precedes it will need to be updated.
- The 2014 Addendum to Chapter 9, to address the US Route 13/Bay Road Corridor Transportation Improvement District (TID), should be incorporated into the body of the transportation chapter in the new Plan. For various reasons, work on creating the TID has not progressed as quickly as DelDOT or the City anticipated in 2014 so no substantive changes to text of the addendum seem necessary. DelDOT remains committed to working with the City to create the TID.

**State Historic Preservation Office – Contact: Carlton Hall 302-736-7404**

- The State Historic Preservation Office would like to hear more details about how the city's plans to collaborate and work with diverse groups and governments.

**State Housing Authority – Contact: Karen Horton 739-4263**

- According to Title 22, Section 702 Del C., municipalities with population greater than 2,000 persons, must include policies, statements, goals, and planning components to define the community's strategy for providing affordable housing for current and future residents.
- DSHA encourages the City to incorporate demographic trends into the Housing Analysis. A growing body of research indicates that Delaware, like the rest of the nation, is in the midst of a significant market shift. Baby boomers that once drove suburban development are now aging and are looking to downsize into something more manageable. The Delaware Population Consortium (DPC) projections for the next ten years indicate that not only will there be a large amount of suburban homes placed on the market by baby boomers, but that there will be a *decline* in households in age ranges that typically seek large homes. These same DPC projections show growth in the younger age ranges most likely at stages in their life and income to support entry-level homes.

In addition, many families did not recover from the national economic crisis unscathed. Many families lost their homes, or suffered significant credit damage making it difficult to return quickly to homeownership. As households reverted from ownership to renting, or postponed purchasing a home, both nationally and in Delaware the 2000s marked the highest decade-long growth in renter households in the last 60 years. This trend is only expected to continue. This is resulting in a tighter rental market pushing rents up. These stressors are compounded for persons with disabilities and other vulnerable households. At the same time, development is more complex than ever, resources to reduce costs remain scarce and bridging affordability gaps using existing programs is a perpetual challenge. All of these factors indicate that it is critical that communities proactively provide a variety of housing options to meet the needs of their residents.

- Over the last few years, there has been a proliferation of Criminal Activity Nuisance Ordinances (CANO) throughout Delaware. However, depending how they are written and implemented, these ordinances can have the effect of subjecting tenants to eviction for a broad range of offenses and presents several concerns, particularly:
  - Discouraging crime victims who need emergency aid from calling for assistance or to report a crime, particularly survivors of domestic violence where additional protections were recently enacted under the Violence Against Women Act (VAWA).
  - The federal Fair Housing Act (FHA), which protects tenants from discriminatory housing policies and practices. Tenants' rights to be free from discrimination, to contact the government for assistance, and to receive due process can be curtailed in the implementation of these ordinances.

We understand that the City of Dover adopted this type of ordinance in 2013. There are legitimate concerns about nuisance properties and the problems they create for the

neighborhood and community. Unfortunately, the ordinance in place in Dover does raise some concerns, especially in light of recent court decisions related to fair housing. In 2015, the Supreme Court upheld the application of citing disparate impact in housing discrimination cases in Texas Dept. of Housing & Community Affairs v. The Inclusive Communities Project, Inc. In recent years, the U.S. Department of Housing and Urban Development (HUD) has vigorously pursued violations, including CANO ordinances:

- Briggs v. Borough of Norristown, PA
- Conciliation Agreement between HUD and City of Berlin, NH

HUD has also pursued several fair housing-related cases with Delaware jurisdictions and HOAs. While none are related to CANO ordinances to date, jurisdictions should be very careful to consider fair housing issues in the development and implementation of local ordinances. Even local efforts which are intended to improve neighborhood conditions in distressed areas can have a disparate impact on protected classes.

As a result, as the City of Dover updates its Comprehensive Plan, we strongly recommend that the City of Dover revisit Ordinance #2013-04 as part of the update. DSHA would be glad to work with you to ensure the ordinance is revised in a manner that addresses the above concerns.

- DSHA offers the following information as the City prepares its Comprehensive Plan Update:
  - The *2015-2020 Statewide Housing Needs Assessment* (HNA) is a great resource and can be found at the below link. There is the full document, executive summaries, handouts, a reporting portal (that takes you to an interactive map).  
<http://www.destatehousing.com/FormsAndInformation/needs.php>
  - In addition to the HNA, the following housing information is available on DSHA's 'Research and Plans' website  
<http://www.destatehousing.com/FormsAndInformation/datastats.php>. DSHA updates this data regularly and produces the following reports:
    - Kent County Housing Fact Sheet –  
[http://www.destatehousing.com/FormsAndInformation/datastatmedia/ds\\_kent\\_fs.pdf](http://www.destatehousing.com/FormsAndInformation/datastatmedia/ds_kent_fs.pdf)
    - Median Home Price and Affordability Gap data for each year for the most recent quarter and the past 10 years -  
<http://www.destatehousing.com/FormsAndInformation/affordgap.php>
    - Sheriff Sale data from 2008 to 2018 by Zip Code –  
[http://www.delawarehomeownerrelief.com/media/sheriffsale\\_2008\\_kent.pdf](http://www.delawarehomeownerrelief.com/media/sheriffsale_2008_kent.pdf)
    - Monthly Foreclosure and Sheriff Sale Data -  
<http://www.delawarehomeownerrelief.com/data.php>
- DSHA offers technical assistance to the City in reviewing tools and strategies to increase affordable housing opportunities within Dover.



- DSHA has developed a website, **Affordable Housing Resource Center**, to learn about resources and tools to help create housing for households earning 100% of median income or below. Our website can be found at: [www.destatehousing.com](http://www.destatehousing.com) "Affordable Housing Resource Center" under Other Programs.

If you have questions or would like more information on the above recommendations, please feel free to call me at (302) 739-4263 ext. 251 or via e-mail at [karenh@destatehousing.com](mailto:karenh@destatehousing.com).

**Department of Agriculture – Contact: Scott Blaier 698-4532**

- The Department supports the Land Development Plan Goal for Agriculture Land Uses on page 9.
- On page 57 please correct the typo (“There are two” not There two ...)
- Chapter 12 Land Development Plan
- Pages 159-160 discuss agricultural land uses. Please retain the spirit of this language as it is still relevant.
- Chapter 13 Growth and Annexation Plan
- Page 167 – Papen Farms (aka Farm Lands, LP) recently renewed their District Agreement for another 5 years, and their preserved land will remain in the Farmland Preservation Program until at least 2023.
- Page 181 - indicates one of the action items of the plan was to update its Agriculture (A) Zone – Has this been done ?
- Page 183 – One of the plan’s action items was to develop a Transfer of Development Rights Program . The Department support’s initiative, and is willing to assist the city if it decides to move forward.
- The Department encourages the city to continue working on its tree canopy and infrastructure goals. Please feel free to contact the department’s Urban Forester, Kesha Braunskill, for assistance (698-4578).

**The Department of Natural Resources and Environmental Control – Contact: Michael Tholstrup 739-9071**

**Source Water Protection.**

- The City passed and adopted a source water protection ordinances in compliance with 7 Del. C. 6082(b). This ordinance does not address wellhead protection areas for the City’s eastern well field that extends into the municipal boundaries (see map below). Nor does the map included in the 2008 Plan show all the public wells within the municipal boundaries. This may be a potential certification issue.

- The text of the Comprehensive Plan acknowledges that the ordinance adopted by the City included only municipal wells and not the wellhead protection areas around other public wells. Further noting that the ordinance needed to be updated to reflect the other public wells (Page 46, 2008 Plan). A review of the City of Dover’s online code accessed 2018-03-22 did not find any language supporting an update.
- The Compressive Plan must include:
  - Text of the comprehensive plan must include description of source water requirements in 7 Del.C. 6082(b), and include goals and objectives related to the protection of the resource. This text shall be placed within the water and sewer element of the local government’s comprehensive plan, as prescribed by Title 9 or Title 22 of the Delaware Code.
  - All municipalities and counties with a population of 2,000 or more persons (as reported in the most recent decennial Census) undergoing regular plan updates will be required to incorporate updated source water maps derived from the most current datasets<sup>1</sup> provided by the Department of Natural Resources and Environmental Control (DNREC). The map and plan text must clearly include the note that the regulatory provisions of any source water ordinance will refer to this map, as provided in the Comprehensive Plan update and as amended from time to time.
- The text of the comprehensive plan does include a discussion of their source water protection overlay. While the text references the Delaware General Assembly passing the Source Water Protection Act in 2001, it must reference the requirements of in 7 Del.C. 6082(b).

In addition, the discussion should be included in the Public Utilities and Infrastructure section of the Plan, as prescribed by Title 9 or Title 22 of the Delaware Code.

- Map should include all wellhead protection areas within the municipal boundaries. The map must be revised to include all wellhead protection areas within the municipal boundaries. Source water maps shall be derived from the most current datasets<sup>1</sup> provided by the Department of Natural Resources and Environmental Control (DNREC). This is a potential certification issue (7 Del. C. § 6082 (f)).

<sup>1</sup><http://opendata.firstmap.delaware.gov/datasets/delaware-well-head-protection-areas>

### Recommendations for Comprehensive Plan Content

#### **Air Quality.**

- DNREC supports the City of Dover in continuing its involvement in various city-wide initiatives like the Cool Cities program hosted by the Sierra Club which seeks to “develop and apply smart growth and smart energy solutions” will help combat the problem of air



pollution. DNREC also recommends continued deployment of air pollution mitigation and control strategies, including the following:

- Encouraging mixed-use development in Downtown Dover,
  - Allowing opportunities for the increased access/use of public transit,
  - Expansion of the current bicycle and pedestrian network,
  - Continued participation in the “Ozone Challenge,”
- DNREC would like to see a discussion of air quality impacts in the city, along with air quality and air pollution mitigation strategies, among its transportation goals.

As an added component to address air quality concerns in the area, the City of Dover is encouraged to add electric vehicle supply equipment (EVSE) and charging where feasible in common areas to accommodate cleaner vehicular transportation through the area. EVSE charging could be marketed as a unique selling point to help recover vacant properties. For more information about the various electric charging options and state programs that can provide financial and technical assistance, please see our website.

- [www.de.gov/cleantransportation](http://www.de.gov/cleantransportation).

#### **Water Quality: TMDLs.**

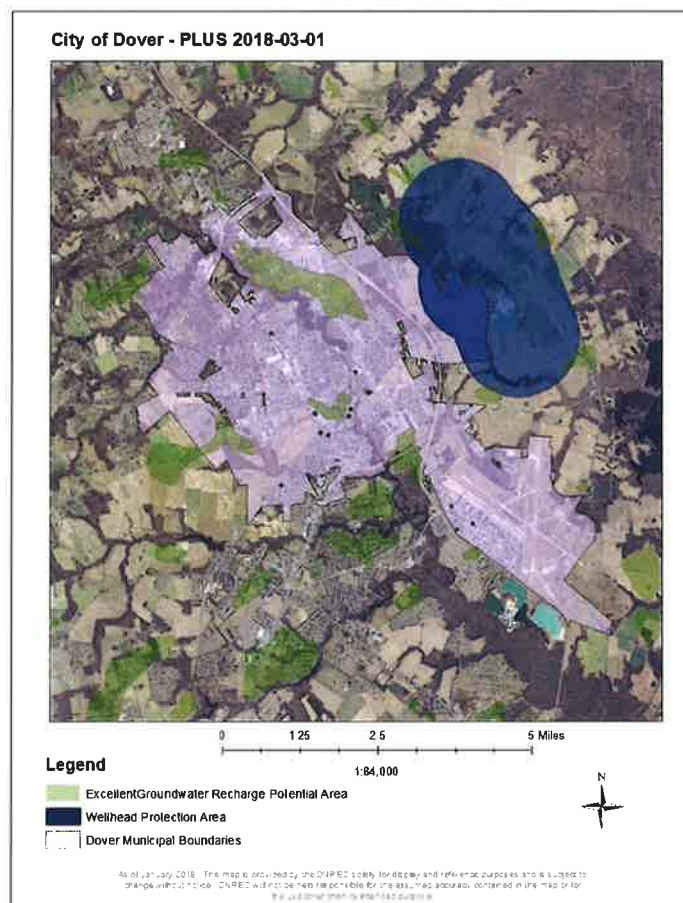
- DNREC would like to be a partner in working with the City of Dover to help meet TMDL nutrient and sediment reduction requirements necessary for restoring water quality and supporting beneficial uses (e.g., fishing, swimming, & drinking water) to waters of the St. Jones River watershed and the greater Delaware River Drainage. We recommend that the City of Dover be more proactive and make specific, actionable strategies to attain the TMDL nutrient and bacteria reductions necessary for restoring water quality.

Overall water quality stewardship would be greatly enhanced by addressing the impact of development and utilizing growth strategies, green infrastructure and other best management practices when dealing with sensitive habitat, wetlands and stormwater management. Upon review of your 2008 Comprehensive Plan, DNREC has identified some concerns and provided the below recommendations and resources for your consideration:

- Improve protection of freshwater wetlands where regulatory gaps exist (i.e., isolated wetlands and headwater wetlands).
- Develop an impervious surface mitigation plan which incentivizes the use of pervious paving materials where feasible.
- Exclude areas of structural Best Management Practices (BMPs) from consideration in the calculation for required open space; such as community

wastewater treatment areas, open-water stormwater treatment structures, and natural areas containing regulated wetlands.

- Prohibit development on hydric soil.
- Promote “green-technology” stormwater management in lieu of “open-water” stormwater management ponds whenever practicable.
- Utilize the Department’s TMDL nutrient loading budget protocol and promote the use of approved BMPs to meet the required TMDLs within an affected watershed.



### Climate Change.

- Since the development of the City of Dover’s 2008 Comprehensive Plan, an enormous amount of data and information has become available regarding climate change and its impacts to Delaware and we encourage you to utilize this information to make plans for Dover’s future.

The comprehensive planning process is a unique opportunity to view all aspects of Dover's future through a climate change lens to ensure that plans laid out today will be sustainable in the long term. We recommend that the City's comprehensive plan consider climate change in each major plan component, but particularly in the Housing, Environment, Transportation and Water sections.

- Climate change will result in three primary impacts for the state and City of Dover:
  1. **Sea Level Rise:** Sea level rise affects all tidal bodies of water, including the St. Jones River which winds through downtown Dover. Sea levels are anticipated to rise by 1.5 meters by the end of century, and as much as 0.6 meters (1.9 feet) by 2050. Sea level rise can lead to inundation of infrastructure and natural areas adjacent to waterbodies, water quality problems through saltwater intrusion into drinking water wells and wastewater treatment issues through rising water tables affecting septic systems.
  2. **Increased Heavy Precipitation Events:** Climate change is expected to result in more frequent heavy precipitation events. This can lead to flooding, especially in areas with inadequately sized drainage infrastructure. This flooding can result in safety hazards, inaccessible roadways, travel delays, and damage to buildings or other infrastructure.
  3. **Rising temperatures.** Rising temperatures will result in a longer growing season, heat waves, and more days where it doesn't cool off at night. This has many implications for infrastructure and human health. Air conditioning systems in buildings may not be sized appropriately for increasing temperatures and shorter, milder winters can mean residents are dealing with more ticks and mosquitoes. Of particular concern are vulnerable populations (e.g. elderly, low-income and non-English speakers) who may not have access to air conditioning in the summer.
- Several towns in Kent County and throughout the state have incorporated climate change concerns into their comprehensive development plans and there are several good examples to follow. Perhaps the more useful is a recent report prepared by the UD Institute for Public Administration that details how climate change was incorporated into the City of Milford Comprehensive Plan and describes best practices for incorporating climate change into comp plans. It is available online: <http://www.ipa.udel.edu/publications/cccpd-2017.pdf>.
- There is an incredible volume of information available about climate change impacts. The following is a short list of the most relevant and useful information for your comprehensive development plan efforts:

1. Comprehensive information about climate change and climate impacts in Delaware can be found here: <https://dnrec.alpha.delaware.gov/energy-climate/climate-change/>
  2. New sea level rise scenarios and maps are available. The maps provide inundation at 1-foot increments and the new scenarios provide improved information about sea level rise impacts mid-century. The report and links to maps can be found on the Delaware Geological Survey website: <http://www.dgs.udel.edu/projects/determination-future-sea-level-rise-planning-scenarios-delaware>
  3. The Delaware Sea Level Rise Vulnerability Assessment provides information about sea level rise impacts to infrastructure, natural resources and economy: <http://de.gov/slrva>.
  4. The Creating a Flood Ready Community training site provides links to a wide variety of resources that can be used to plan for sea level rise: <http://dnrec.delaware.gov/coastal/DNERR/Pages/CTP%20Pages/FloodReadyCommunityResources.aspx>
  5. Climate change impacts to human health are reviewed in the fall issue of the Delaware Journal of Public Health: [https://issuu.com/dam-dpha/docs/djph\\_october2017](https://issuu.com/dam-dpha/docs/djph_october2017)
- In addition to preparing for the effects of climate change, the city of Dover is also encouraged to help reduce the emissions of greenhouse gases that are the root cause of climate change. Often, strategies to reduce greenhouse gas emissions can also save money and improve public health. Incorporating electric vehicles into the City's fleet would reduce tailpipe emissions and save money. Providing electric vehicle charging stations incentivizes electric vehicle drivers to work, visit and play in downtown areas. Weatherizing homes and deploying energy efficiency measures help cut energy costs and makes homes and work spaces more comfortable for occupants.
  - In addition, the City may wish to consider opportunities for grant funding and technical assistance. DNREC offers grant funding for sustainability and climate change planning through the Sustainable Communities Planning Grant Program and the Resilient Community Partnership. The Grant program provides funding for local governments to develop a long term plan for climate change and/or sustainability. The Partnership provides direct staff support, policy expertise, technical assistance and funding to help a community through the resilience planning process.
  - DNREC staff are always available to assist and would be happy to meet with City staff and its consultants to discuss climate change vulnerabilities in the City and greenhouse gas reduction strategies.

**Fish and Wildlife.**

- The Delaware Wildlife Action Plan (DEWAP) is critical to helping Delaware fulfill its responsibility to conserve its abundant fish and wildlife and natural habitats for future generations. The conservation of all wildlife species and the habitats they rely on is a great way to protect the unique environmental features associated with the City of Dover. The City is encouraged to utilize the information in this plan to guide conservation efforts and land use patterns. <http://www.dnrec.delaware.gov/fw/dwap/Pages/default.aspx>

**Parks and Recreation.**

- DNREC recommends the incorporation of results from the Statewide Comprehensive Outdoor Recreation Plan (SCORP) in the Community Services and Facilities section, to supplement activities undertaken by the City's Parks & Recreation Department. The survey's findings support many of the vision and goals of Dover's Comprehensive Plan focused on connectivity, multi-modal transportation. The City may wish to use this information in other sections of the plan to provide further documentation of community needs and desires. The City of Dover is located in planning Region 3 of the SCORP. <http://www.dnrec.delaware.gov/parks/Information/Pages/2013Scorp.aspx>.

Since this was a Pre-update meeting for your plan update, we will need to see the completed document at a regular PLUS meeting once your Planning Commission has approved the draft plan for public review. Thank you for the opportunity to review this update. If you have any questions, please contact me at 302-739-3090.

Sincerely,



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