

April 10, 2007

Ms. Constance C. Holland, AICP
State of Delaware Office of Management and Budget
State Planning Coordination
122 William Penn Street
Third Floor
Dover, DE 19901

**RE: PLUS REVIEW 2007-02-03
NORTH DOVER PARK CENTER**

Dear Ms. Holland:

We are in receipt of the PLUS Review comments dated March 23, 2007 and received in our office March 27, 2007. We have the following responses to your comments:

Office of State Planning Coordination

The project is located within the growth zone with existing water and sewer utilities already present on site. We note that you have no objection to the proposed development in accordance with the relevant County codes and ordinances.

Division of Historical and Cultural Affairs

The development will take place on previously disturbed ground. We understand that the unexpected discovery of human remains are governed under Delaware's Unmarked Human Remains Act and will abide by this regulation if remains are found.

Street Design and Transportation

The plan reflects the recommendations of the approved Traffic Impact Study.

Sidewalks are currently proposed along the Route 13 frontage and along both sides of Salt Creek Drive entering the site. These sidewalks are linked to the main retail complex. We will add additional sidewalks for linkages to Platinum Drive and Silt Stone Drive.

The first access point along the entrance drive will be eliminated as requested.

The loading zone will be moved as the pharmacy pad will be reconfigured to address the comments from the agencies. This will allow the parking to circulate around the building.

The bank pad will be moved as requested.

The entrance island will be adjusted as requested as part of the detailed entrance design permit.

The developer owns both North Dover Park Center and the adjoining Fieldstone Village. The traffic calming devices may be added as necessary.

Cross access easements will be provided to the four properties adjoining Route 13 and the shopping center.

We will discuss the possibility of an overlay with DeIDOT as part of the entrance design process.

A bus stop will be added along Route 13 as requested.

DNREC

Soils

We are aware of the nature of the soils listed from the soil survey. A geo-technical investigation has been performed for evaluation of the existing soils and recommendations for footing, pavement design and stormwater management.

Wetlands

The wetlands shown on the plan were field delineated by JCM Environmental Consultants, Inc. in October 2004. We are not proposing any disturbance within the wetlands shown on the plan.

Impervious Cover

The maximum allowed impervious surface coverage within the BG Zone is 75% per Section 205-173 of the Kent County Zoning Ordinance. The proposed plan will comply with this requirement. We have checked the Impervious Area Calculation shown on the plan and find it to be correct. We believe the reviewer to be thinking the existing mobile home park shown adjacent to the site to be included in the impervious area calculation, which it is not. The proposed plan is only for the shopping center and the impervious area limit only applies to that portion of the development. We will employ BMPs to address stormwater quality and quantity management to mitigate the adverse impacts of the impervious coverage proposed.

TMDLs

Total Minimum Daily Loads will be addressed during the design of the stormwater management system for the site. We understand the site to be located within the St. Jones watershed and that 40% post-developed TMDL reductions are required for the project. We will work with the Kent Conservation District and DNREC to meet this standard.

Water Resource Protection Area

The existing wells are to be abandoned and are currently not in use. The abandonment of the wells will eliminate the Wellhead Protection Area.

Water Supply

The project will be served by Tidewater Utilities. Water mains are in place within the Fieldstone Village Mobile Home Park with stubs available to serve the shopping center.

We acknowledge that a dewatering permit may be needed for dewatering associated with the construction. We will contact the Water Supply Section if this is needed.

Sediment and Erosion Control/Stormwater Management

- 1) The site will outfall to the wetland area to the north, the DeIDOT right-of-way to the east and through the adjoining mobile home park to a swale along the southwest corner of the site. The outfalls will be evaluated for capacity and onsite design will be done so to not exacerbate existing drainage concerns.
- 2) Clearing has been limited to approximately 11%. The stormwater management facility shown will address water quality needed for the project.

- 3) Access will be designed into the stormwater management facility.
- 4) Landscaping will be provided for the stormwater management areas.
- 5) We are aware of the TMDL reduction required for this site. BMPs will be used in the design of the site.
- 6) We will not be asking for a waiver of stormwater quantity management for the site. We will be using above ground BMPs and underground storage systems to meet quality and quantity management requirements for the site.
- 7) The responsible party for maintenance of stormwater management facilities will be listed on the construction plans.
- 8) A letter of no objection will be needed for the shopping center development. We understand the detailed design plans must be done prior to receiving the letter.
- 9) The subdivision is not part of this development. Grading of the shopping center parcel will be done to ensure drainage problems do not occur within the adjoining subdivision.

Drainage

- 1) We will contact Jim Sullivan of the Drainage Section to discuss drainage concerns downstream of the site and determine the limits of the downstream analysis.
- 2) Drainage easements necessary for the project will be recorded as requested.

Forested Wetlands

We have located field delineated wetlands on the north side of the site, as mentioned. We are showing the Kent County required 25' buffer. The paving is well beyond the 25' buffer with an average buffer width of approximately 80'. There is a small finger of wetlands that extends further south where the paving is close to the 25' buffer. We will also be adding porous turf pavers to all parking bays that are close to the wetland area to gain pervious area.

We also have pulled the parking are in the northwest corner back 10' toward the buildings to further increase the buffer.

We have made several small changes to the plan that will have a positive effect to increase the buffer beyond what was originally shown on the plan.

Underground Storage Tanks

Previous construction at the site did not yield any contaminated soils from the LUST sites mentioned.

Site Investigation and Restoration

As mentioned above, previous construction at the site did not yield contaminated soils or groundwater.

State Fire Marshal's Office

- a) Fire hydrants will be placed at the required spacing to achieve the required pressure.
- b) Fire lanes and fire marking will be provided as required.
- c) The site will be designed to be accessible for fire apparatus.

- d) It is not anticipated that bulk containers will be used for gas service.
- e) The required notes will be added to the plan.

Department of Agriculture

The site will be landscaped per Kent county code requirements with native species. Tree clearing has been minimized onsite. Additional trees and shrubs will be placed along the western border to increase the buffer from the adjoining residential subdivision.

Public Service Commission

We understand that gas piping must be installed per the Pipeline Safety Guidelines.

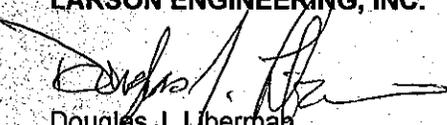
Department of Education

The Department of Education has no objection to the proposed commercial project within the Capital School District.

We have responded to the comments and incorporated them into our proposed plan. Please review the comments and call me if you have any questions.

Sincerely,

LARSON ENGINEERING, INC.



Douglas J. Liberman
Vice President

Pc: Mike Petit de Mange – Kent County Planning