STATE OF DELAWARE
EXECUTIVE DEPARTMENT
OFFICE OF STATE PLANNING COORDINATION

April 25, 2019

Hal Goodwin
Town of Greenwood
100 W. Market Street
P.O. Box 216
Greenwood, DE 19950

RE: PLUS review 2019-01-08; Town of Greenwood Comprehensive Plan

Dear Mr. Godwin:

Thank you for meeting with State agency planners on March 27, 2019 to discuss the Town of Greenwood's comprehensive plan. State agencies have reviewed the documents submitted and offer the following comments. 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.

Certification Comments:

1. Please clarify your position on the following sections:

   Development of adjacent areas. The Town has stated that they do not want annexation at this time but how do you see the adjacent areas developing in the County? What can the town do coordinate the expected growth? Should there be an MOU with the County and if so, that should be an implementation item.

   This may be where you would mention the Bridgeville-Greenwood Plan. The town needs to give the status of this master plan. - - -either to acknowledge that they will continue to abide by the plan or that they plan will no longer be in force.

   If you continue to use the plan, the map should be included in the plan and your future land use map should coordinate with this map.

   If the town is not going to continue with this plan, you should formally notify Bridgeville and you should note that in the plan.

Critical Community Development Issues. Over the next 10 years, does the town foresee and critical community development issues? Abandoned properties? The need for enhanced job opportunities? If so, state what they are and how the town intends to resolve the issues.

Key Infrastructure issues – Are there any issues that will keep you from developing as your plan envisions? If so, what are they? What implementation needs to be done to fix the issues? This includes, water, sewer, roads, parks, etc. Many of these items may need coordination with the County or State but the town should conclude section 3.2 with a wrap-up on how the town will address these issues.

2. Your annexation map has a "multi-jurisdictional planning area" What does this mean. It should be explained.

3. The Town must share a copy of the plan with the Town of Bridgeville and with Sussex County for comments. The plan, in the Intergovernmental section, should note that a copy of the plan was sent to these jurisdictions and give an overview of comments received, if any. If comments were given, you should state what steps were taken, if any, to address their concerns.

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: Dorothy Morris 739-3090

- The intergovernmental coordination section should be expanded to include continued coordination with State Agencies regarding road, environmental protections, economic development, and parks.

- Because the town has a large annexation area of over 2,000 acres, the town should expand the annexation section to include an overview of the Future Land Uses proposed in these areas. Although the town states that they do not want to annex at this time, they should be prepared to annex if a property owner seek annexation. Give a vision behind each annexation zone proposed, explain what each zone means to the town, what types of uses area allowed in the areas and how, if built out, it would impact the future of the town.

- The town should compare your map with the Strategies for State Policies and spending. Do they coordinate? Are there changes the town would like to see in the Strategies maps? A copy of the Strategies map should be included in the plan.

Department of Transportation – Contact: Bill Brockenbrough 760-2109

- The Town's treatment of the Corridor Capacity Preservation Program is sufficient. However, if the Town would like to address it in more detail, additional information is available from Mr. Tom Felice, who manages that program. Mr. Felice may be reached at (302) 760-2338 or Tom.Felice@delaware.gov.

- In addition to the Corridor Capacity Preservation Program, the Plan identifies three other initiatives with which DelDOT can provide assistance, specifically:

    - Development of a traffic safety program to address speeding along Delaware Route 16;

    - Development of a sidewalk improvement program; and

    - Encouraging DART to extend bus service to Greenwood.

    - Ms. Jennifer Cinelli-Miller, a planner in DelDOT's Statewide and Regional Planning Section, can serve as an initial point of contact on all three of these efforts and can connect the Town with appropriate DelDOT staff. Ms. Cinelli-Miller may be reached at (302) 760-2549 or Jennifer.Cinelli@delaware.gov.

- DelDOT recommends that the Town refer to the Mobility chapter, Chapter 13, of the Sussex County Comprehensive Plan to ensure there is continuity with the County and their strategies.

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

Page 37- Public Services and Infrastructure

- Source water protection areas include surface water water-supply watersheds, wellhead protection areas, and excellent groundwater recharge potential areas. The Town of Greenwood has 2 large unconfined aquifer wells which have a delineated area that covers a large portion of the western side of town. The Town also has a patch of excellent recharge potential area that overlaps that area as well as a large swath that runs along its easternmost boundary.

  Delaware's Source Water Protection Law of 2001 (7 Del C. §6081-6084) requires that all municipalities with greater than 2,000 residents adopt and enforce a source water protection ordinance. However, the Town of Greenwood currently has fewer than 2000 persons.

  Source Water Protection Recommendations: Because the Town has fewer than 2000 persons, there is no statutory requirement for Greenwood to implement a source water protection ordinance. However the Town is encouraged to add a section into the

Comprehensive Plan to discuss source water protection and to consider adopting a source water protection ordinance that is protective of the resource. Should you have any questions regarding the requirements of the source water protection law, the source water protection program, or want technical assistance to develop the language, please contact Doug Rambo of the DNREC Division of Water, at (302) 739-9945.

Page 27- Natural Features:

- The Town should consider adding a new subsection to the Comprehensive Plan entitled "TMDLs and Water Quality" within the "Natural Features" section, to discuss total maximum daily load (TMDL) reduction requirements for nutrients (e.g., nitrogen and phosphorus) and bacteria. The section should include a discussion of the watershed implementation plan (WIP) and the pollution control strategy (PCS) which are both essential for meeting/achieving the nutrient and bacteria pollutant load reductions required by the TMDLs. This narrative should be accompanied by Table 1 (below), and may include the following template language in its entirety:

  TMDLs and water quality

  Under section 303(d) of the 1972 Federal Clean Water Act (CWA), states are required to identify all impaired waters and establish total maximum daily loads (TMDLs) to restore their beneficial uses (e.g., swimming, fishing, shellfish harvesting, and drinking water). A TMDL defines the amount of a given pollutant that may be discharged to a water body (including the ability of a "water-quality limited" waterbody to assimilate a given pollutant) from point, nonpoint, and background sources, while still allowing attainment or maintenance of the applicable narrative and numerical water quality standards. Additional information on TMDLs can be obtained from the following web link: http://www.dnrec.delaware.gov/swc/wa/Pages/WatershedAssessmentTMDLs.aspx

  EPA has developed a TMDL reduction requirement for a 60 percent reduction in nitrogen and phosphorus (previously 30 and 50 percent for N & P) from baseline conditions. The TMDL reduction requirement for bacteria requires a 2 percent reduction in bacteria from baseline conditions (see table 1).

Nutrients (N&P) and Bacteria	**N**	**P**	**Bacteria**
Nanticoke River watershed	60%	60%	2%

Table 1: Required TMDL pollutant load reductions for nutrients and bacteria in the Nanticoke River watershed

  A Pollution Control Strategy (PCS) identifies the specific strategies and actions necessary for reducing pollutants in a given water body (or watershed) by achieving the water quality criterion set forth in the State of Delaware's Water Quality Standards – resulting in the attainment of the TMDL reduction requirements – ultimately leading to the

restoration of a given waterbody's designated beneficial use(s). The PCS for the Nanticoke River watershed consists of recommendations from the following three areas: agriculture, stormwater, and wastewater. Currently, the PCS for the Nanticoke River watershed contains only suggested or non-regulatory recommendations. Additional information on the PCS can be obtained from the following web link: http://www.dnrec.delaware.gov/swc/wa/Pages/WatershedManagementPlans.aspx

Additionally, as part of TMDL implementation, each Bay jurisdiction, by state, is required to develop a Watershed Implementation Plan (WIP) that details how pollutant load goals will be achieved and maintained into the future. The WIP identifies specific pollution reduction practices and programs to reduce nitrogen, phosphorus, bacteria, and sediment from a variety of sources in the greater Chesapeake drainage area. This may require local jurisdictions to assume some responsibility for implementation to help mitigate pollutant runoff. The WIP includes both regulatory and non-regulatory components; additional information about the WIP can be obtained from the following website: http://www.wr.dnrec.delaware.gov/Information/Pages/Chesapeake_WIP.aspx.

DNREC recommends that the Town of Greenwood be proactive and make specific actionable strategies in the updated Comprehensive Plan that would help attain the TMDL nutrient and bacteria reductions necessary for restoring water quality and beneficial uses to waters of the Nanticoke River Watershed, and Chesapeake Bay drainage basin (e.g.., fishing, swimming, & drinking water). To this end, we recommend that the Town include the following proposals for ordinances in the Town's Comprehensive Plan:

- Implement regulations to protect freshwater wetlands where regulatory gaps exist (i.e., isolated wetlands and headwater wetlands), including a 100-foot upland buffer width from all streams, wetlands, and waterbodies.
- Page 40, Off-street parking- Create an impervious surface mitigation plan for all parking areas and consider pervious paving materials.
- Prohibit development on hydric soils.
- Require the use of "green-technology" storm water management practices.
- Require the assessment of a project's TMDL nutrient loading rate through use of the DNREC's nutrient budget protocol.
- Require the assessment of a project's TMDL nutrient and bacteria loading rate(s) 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. Alternately, the applicant/developer may use the land-use loading rate model developed by the Chesapeake Bay program (with calculations performed by a consulting engineering firm or licensed engineer on behalf of the applicant) to help design and implement the most environmentally-

effective solutions. The Chesapeake Bay model report can be found here: http://cast.chesapeakebay.net/Documentation/ModelDocumentation

DNREC and the Sussex Conservation District can provide specific guidance.

Page 34- Refuse and Recycling

- Per the Universal Recycling Law, waste haulers are required to provide equal access to both trash and recycling services as one fee. The Town should include a recycling discussion in this section (or its own section) and review its contract to make sure it is receiving all of the services that are required to be provided.

Page 37-38, Stormwater Management

- The Delaware Sediment and Stormwater Regulations have a goal of reducing stormwater runoff for the rainfall events up to the equivalent one-year storm, 2.7 inches of rainfall in 24 hours, or a maximum of one inch of runoff. Runoff reduction practices encourage runoff to infiltrate back into the soil as in an open space condition and results in pollutant removal and stream protection. Best management practices that encourage infiltration or reuse of runoff, such as porous pavements, rain gardens, rain barrels and cisterns, green roofs, open vegetated swales, and infiltration systems should be allowed for new development sites within the Town. Furthermore, limiting land disturbance on new development projects and limiting impervious surfaces by allowing narrower street widths, reducing parking requirements, and allowing pervious sidewalk materials will be necessary to help achieve the runoff reduction goals in the revised regulations.

- The Department recently published an easy to understand green infrastructure guide for Delaware which explains concepts for natural stormwater management strategies: www.de.gov/greeninfrastructure.

- Reference is made in the draft plan, to a review of Greenwood's local stormwater management regulations, completed in 2012 by the Tetra Tech engineering firm. The text provides a list of stormwater management goals for the Town along with suggestions for adopting local code revisions to help meet them. This Plan update is an appropriate place to cite any implementation steps that the Town has taken, resulting from the 2012 study and recommendations.

Page 39, Parks and Recreation

- In August of 2011, the Delaware Division of Parks and Recreation conducted a telephone survey of Delaware residents to gather information and trends on outdoor recreation patterns and preferences as well as other information on their landscape perception. These findings are the foundation of the 2013-2018 Statewide Comprehensive Outdoor Recreation Plan (SCORP) providing guidance for investments in needed outdoor recreation facilities and needs within county and municipal comprehensive plans. For the purpose of refining data and research findings, Delaware was divided into five planning regions. The Town of Greenwood is located within SCORP Planning Region 4.

When looking at the findings from the 2011 telephone survey, it is apparent that Delawareans place a high importance on outdoor recreation. Statewide, 93% of Delaware residents indicated that outdoor recreation had some importance in their lives, while 67% said it was very important to them personally. These findings are very close to the results of the same question asked in the 2008 public opinion telephone survey, indicating a continued demand for outdoor recreation opportunities throughout the State.

Placing high importance on outdoor recreation resonates throughout the five SCORP regions. In Region 4 (Western Sussex County), 66% said it was very important to them personally. The following priority needs list can be utilized by the Town in developing parks and active or passive recreation facilities.

Outdoor Recreation Needs/Priorities

Based on the public opinion survey, the most needed outdoor recreation facilities in Region 4 include:

High facility needs:

- Walking and Jogging Paths
- Swimming Pools
- Hiking Trails
- Community Gardens
- Fishing Areas
- Off-Leash Dog Areas
- Picnic Areas
- Basketball Courts
- Playgrounds
- Bike Paths

Moderate facility needs:

- Hiking Trails
- Boat Access
- Canoe/Kayak Launches
- Camping Areas
- Ball Fields
- Football Fields
- Skateboarding Areas
- Public Golf Courses
- Soccer Fields
- Tennis Courts

Page 44- Economic Development and Redevelopment

- Brownfields are real property the redevelopment, reuse or expansion of which may be hindered as a result of a reasonably-held belief that they may be environmentally contaminated (7 Del.C. §9103(3)). Productive use of these idle properties provides "new" areas for economic development, primarily in former industrial/urban areas with existing utilities, roads and other infrastructure. DNREC encourages the development of Brownfields and offers assistance and may be able to provide grant funding when investigating and remediating Brownfield sites.

  The Delaware Brownfields Marketplace is an interactive database that contains a list of potential Brownfield sites throughout Delaware. The inventory is designed to make it easier for property buyers and developers to locate potential Brownfield properties. Cleaning up and reinvesting in these properties protects the environment, reduces blight, and helps to create jobs for Delaware citizens, while preserving Delaware's precious green space and natural resources.

  To add sites in your municipality to the Marketplace (with owner approval) please contact Melissa Leckie at DNREC's Site Investigation and Restoration Section at (302) 395-2600 or by email at Melissa.Leckie@delaware.gov.

  For information on the Brownfields Program or to determine if any sites in your municipality are currently enrolled in the Brownfields Development Program, please contact Jill Williams-Hall at DNREC's Site Investigation and Restoration Section at (302) 395-2600 or by email at Jill.Hall@delaware.gov.

  For more information on Delaware's Brownfield Program online, please visit: http://www.dnrec.delaware.gov/dwhs/SIRB/Pages/Brownfields.aspx

Preparing for Climate Change

- Since the development of the Town's 2008 Comprehensive Plan new data and information has become available regarding climate change and its impacts to Delaware. DNREC encourages you to utilize this information to make plans for the Town's future.

  The comprehensive planning process is a unique opportunity to view all aspects of Greenwood'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 Town's updated Comprehensive Plan consider climate change in each major plan component, but particularly in the Housing, Public Services, Transportation, and Infrastructure.

- Climate change will result in two primary impacts for Greenwood: increased heavy precipitation events, and rising temperatures. While sea level rise will not directly impact the Town, increased heavy precipitation events and rising temperatures will have the potential of widespread effects on the Town's infrastructure and citizens:

1. 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. Planning for stormwater upgrades should take into account increased capacity for future conditions.

2. 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 cities 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.

- The effects of climate change on human health should be emphasized in the conversation around specific impacts. Public safety concerns and mental health are key factors that could be addressed through planning and education. Below are some areas where the Town can incorporate language about the health of its residents and visitors.

    - Consider developing a policy and/or training that protects the safety of the Town of Greenwood's outdoor workers from extreme heat, e.g., utility/maintenance workers, concession stand workers, etc. On very hot days, outdoor workers should take breaks to relieve themselves from the heat, should feel encouraged to take breaks by upper management, and should be aware of the signs of heat-related illness. For more information on heat-related illness, recommendations, and existing policies please see the Climate-Ready Workforce Pilot Project Report.

    - Consider posting signage in parks and recreational areas that alerts visitors of extreme heat and vector-borne illnesses. Such signage could remind visitors about these threats and what they should do to protect themselves against it. For example: during tick season visitors should put on repellant and check themselves for ticks after a visit.

    - Consider the benefits of developing a building code encouraging cool roofs, e.g., new buildings must be constructed with a cool roof. As temperatures gradually

rise, hotter days become more frequent, and population increases, the Town will experience "urban heat island effect." In order to avoid some of the impacts of hotter temperatures in Greenwood, widespread use of cool roofs will help keep the Town cooler.

- 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

- In addition, the Town 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 https://dnrec.alpha.delaware.gov/energy-climate/sustainable-communities/sustainable-planning/

Sustainable Development

- The Town of Greenwood is encouraged to reduce greenhouse gas emissions. Many strategies to do so can also save the Town money, improve public health, and support economic development efforts.

  Incorporating electric vehicles into the Town'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. Funding is available for local governments, businesses, and citizens for both vehicles and charging stations through the Delaware Clean Vehicle Rebate Program (www.de.gov/cleantransportation)

- Page 40- DNREC recommends that the town expand and make safer their bicycle and pedestrian network to help reduce the emissions of carbon pollution that are the root cause of climate change. Expansion of alternative transportation opportunities will help limit the impact of vehicular travel and facilitate the transition from vehicular travel to other more environmentally friendly modes.

- Page 42- Incorporating energy efficiency measures in building design and redevelopment can help cut energy costs and makes homes and work spaces more comfortable for occupants. DNREC provides grants through the Energy Efficiency Investment Fund (EEIF) to help commercial and industrial customers replace aging, inefficient equipment and systems with energy efficient alternatives (www.de.gov/eeif).

- Page 43- DNREC administers a free Weatherization Assistance Program to help establish comfortable, energy-saving homes. The program, run through the Division of Climate, Coastal, & Energy, helps homeowners and renters cut their energy bills by weatherproofing and improving the energy efficiency of their homes. The need for weatherization of homes could be mentioned in the draft plan and we encourage the Town to help inform residents of this program. More information about the program can be found here: www.de.gov/wap.

DNREC staff is always available to assist and would be happy to meet with Town staff and its consultants to discuss climate change vulnerabilities, energy efficiency, and greenhouse gas reduction strategies.

Intergovernmental Coordination

- DNREC recommends continuing to coordinate with Sussex County as they have recently updated their Comprehensive Plan. The 2018 Sussex Plan includes a number of ordinance changes which have been implemented or are under consideration. These will likely affect areas surrounding the Town.

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

- The Town of Greenwood's Comprehensive Plan has a history section from page 16-18. The Delaware SHPO suggests that the town of Greenwood look into the possibility of listing the potential Historic District in their town. There may be properties that could be eligible for listing in the National Register. If listed the town could take advantage of historic preservation tax credit programs. Therefore, our office recommends a survey of properties within the town that are at least 45 years old.

- Note also that the new statewide historic preservation plan, *Partners in Preservation: Planning for the Future, Delaware's Historic Preservation Plan 2018-2022*, is now available online at: https://history.delaware.gov/pdfs/2018-2022DelawareSHPOPlan.pdf (single-page version for printing also available). The new plan emphasizes partnering to achieve common goals and connecting with other planning efforts. We encourage all municipalities to consider how the goals, strategies and actions outlined in the new plan may support and be coordinated with their local planning efforts.

State Housing Authority – Contact: Karen Horton 739-4263

- The Town of Greenwood conducted a thorough analysis of their demographic, economic and housing trends, and provided an honest assessment of issues such as having a:
  - large aging population as well as growing younger population;
  - predominance of single-family homes;
  - significant amount of vacant land within the existing town boundaries; and,
  - housing stock in need of repair.

  The recommendations, such as establishing a 'village' category that will enable infill housing to complement the existing character and scale, are appropriate. The Plan's implementation will facilitate a balance of housing options responsive to their residents' needs.

- Over the last few years, there has been a proliferation of Criminal Activity Nuisance Ordinances (CANO) throughout Delaware. 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 present 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).
- 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.

The DSHA understands that the Town of Greenwood adopted this type of ordinance in 2014. There are legitimate concerns about nuisance properties and the problems they create for the neighborhood and community. Unfortunately, the ordinance in place 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 and 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 homeowner associations. 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 intended to improve neighborhood conditions in distressed areas can have a disparate impact on protected classes.
- As a result, as Greenwood implements its Comprehensive Plan, we strongly recommend revisiting Ordinance #D-18. DSHA would be glad to work with you to ensure the ordinance is revised in a manner that addresses the above concerns.

If you have any questions or would like more information, please feel free to call me at (302) 739-4263 ext. 251 or via e-mail at karenh@destatehousing.com.

Sussex County – Contact Rob Davis 302-855-7820

- Sussex County will be providing sewer service to Greenwood as part of the Western Sussex Area of the Sussex County Unified Sanitary Sewer District. Sussex County recommends the addition of a statement in the "Sanitary Sewer Service" section reflecting a 2.3 percent interim growth limit.

Approval Procedures:

- Once all edits, changes and corrections have been made to the Plan, please submit the completed document (text and maps) to our office for review. **Your PLUS response letter should accompany this submission.** Also include documentation about the public review process. In addition, please include documentation that the plan has been sent to other jurisdictions for review and comment, and include any comments received and your response to them. Substantial changes to this draft could warrant another PLUS review.

- Our office will require a maximum of 20 working days to complete this review.
  - If our review determines that the revisions have adequately addressed all certification items (if applicable), we will forward you a letter to this effect.
  - If there are outstanding items we will document them in a letter, and ask the town to resubmit the plan once the items are addressed. Once all items are addressed, we will send you the letter as described above.

- Once you receive our letter stating that all certification items (if applicable) have been addressed, the Planning Commission and Council should adopt the plan pending State certification. We strongly recommend that your Council adopt the plan by ordinance. The ordinance should be written so that the plan will go into effect upon receipt of the certification letter from the Governor.

- Send our office a copy of the adopted plan along with the ordinance (or other documentation) that formally adopts your plan. We will forward these materials to the Governor for his consideration.

- At his discretion, the Governor will issue a certification letter to your Town.

- Once you receive your certification letter, please forward two (2) bound paper copies and one electronic copy of your plan to our office for our records.

Thank you for the opportunity to review this Comprehensive Plan. If you have any questions, please contact me at 302-739-3090.

Sincerely,

Constance C. Holland

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