



STATE OF DELAWARE
EXECUTIVE DEPARTMENT
OFFICE OF STATE PLANNING COORDINATION

December 23, 2015

Mr. Brian Bassett
Cape Henlopen School District
1270 Kings Highway
Lewes, DE 19958

RE: PLUS review 2015-11-08; Cape Henlopen School District – Shields Elementary

Dear Brian,

Thank you for meeting with State agency planners on November 25, 2015 to discuss the feasibility of replacing an existing school with an 89,000 square foot school on property already owned by the district at 820 Savannah Rd. in Lewes.

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 Lewes 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. Our office has no objections to the proposed development of this project in accordance with the town codes and ordinances.

Code Requirements/Agency Permitting Requirements

Delaware Department of Transportation – Contact Bill Brockenbrough 760-2109

- The proposed school's site plan and entrance plan must be designed in accordance with DelDOT's Development Coordination Manual (formerly the Standards and Regulations

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for Subdivision Streets and State Highway Access), which is available at <http://www.deldot.gov/information/business/subdivisions/changes/index.shtml>.

- From the information provided, it does not appear that the proposed development would meet DelDOT's volume-based criteria, found in Section 2.2.2.1 of the Manual, for recommending that a Traffic Impact Study (TIS) be required (an increase of 500 vehicle trips per day or 50 vehicle trips per hour).
- As necessary, in accordance with Section 3.2.5 and Figure 3.2.5-a of the Development Coordination Manual, DelDOT will require dedication of right-of-way along the site's frontage on Savannah Road. By this regulation, this dedication is to provide a minimum of 40 feet of right-of-way from the road centerline on Savannah 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 Development Coordination Manual, DelDOT will require the establishment of a 15-foot wide permanent easement across the property frontage on Savannah 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 5.3.1 of the Manual, the curb ramps and cross-walks at the site entrances should be improved as necessary to comply with the Americans with Disabilities Act (ADA). The remainder of the frontage sidewalk should be checked for tripping hazards and repaired as necessary but full ADA compliance is not required.

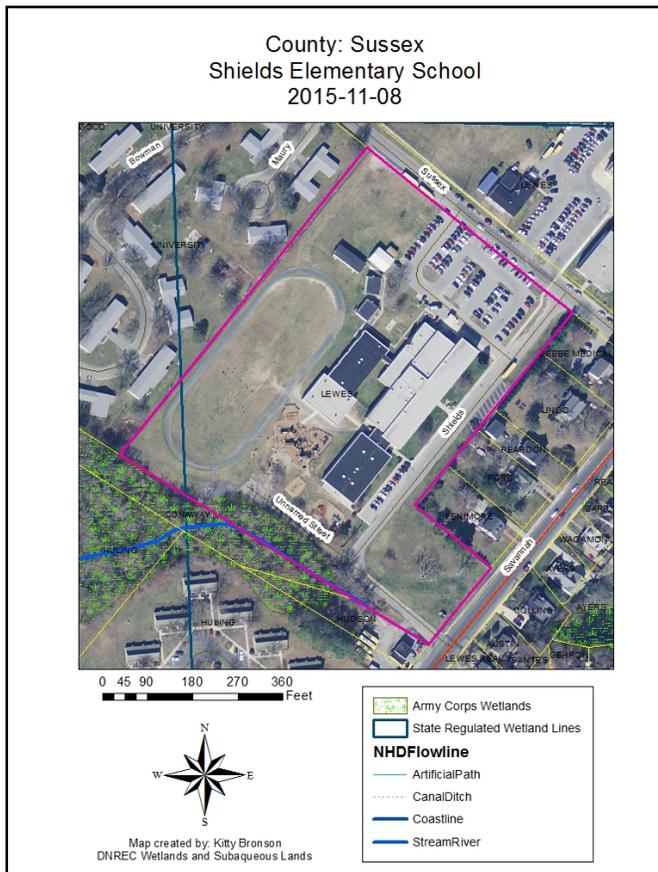
Department of Natural Resources and Environmental Control – Contact Michael Tholstrup 735-3352

Wetlands.

- State subaqueous lands include all tidal waters (up to the mean high water line), most non-tidal rivers, streams, lakes, ponds, bays and inlets (up to the ordinary high water line), most perennial streams and ditches and many intermittent streams and ditches. State regulated subaqueous lands are likely to be located on/or adjacent this property based on a review of aerial photographs, SWMP maps, Soil Surveys and USGS topographic maps. An on-site inspection by a representative of the Wetlands and Subaqueous Lands Section or an environmental consultant is recommended to determine the limits of jurisdictional State subaqueous lands. Upon review of the GIS layers, unnamed streams are on and/or adjacent to this property. Additional information about State regulated subaqueous lands is available by contacting the Wetlands and Subaqueous Lands Section at (302) 739-9943 or online at: <http://www.dnrec.delaware.gov/wr/Services/Pages/WetlandsAndSubaqueousLands.aspx>.

According to our GIS SWMP maps, there are possible wetlands regulated by the Army Corps of Engineers on this property. The area where possible wetlands are located does not look to be impacted. Please be sure to have a delineation done by a consultant if the area indicated will be impacted in any way. Waters of the United States include the following: navigable waters of the United States; wetlands; tributaries to navigable waters of the United States, including adjacent wetlands and lakes and ponds; interstate waters and their tributaries, including adjacent wetlands; and all other waters of the United States not identified above, such as isolated wetlands, intermittent streams, and other waters that are not part of a tributary system to interstate waters or to navigable waters of the United States, where the use, degradation or destruction of these waters could affect interstate or foreign commerce.

Waters of the U.S. regulated by the U.S. Army Corps of Engineers are likely to be located on this property based on a review of aerial photographs, SWMP maps, Soil Surveys and USGS topographic maps. The extent of Federal jurisdiction over Waters of the United States is determined by the U.S. Army Corps of Engineers and is based on site specific conditions. Therefore, an on-site inspection by an environmental consultant is recommended to determine if Waters of the U.S. are located on the property and the limits of Federal jurisdiction. The U.S. Army Corps of Engineers can be contacted at (215) 656-6728 or online at: <http://www.nap.usace.army.mil/cenap-op/regulatory/regulatory.htm>.



TMDLs. The project is located in the greater Delaware River and Bay drainage area, specifically within the Broadkill River watershed. In this watershed, 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). 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 TMDL for the Broadkill River watershed calls for a 40 percent reduction in nitrogen and phosphorus from baseline conditions. The TMDL also calls for a 75 percent reduction in bacteria from baseline conditions.

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 the following web link for additional information: <http://dda.delaware.gov/nutrients/index.shtml>

Water Supply.

- The project information sheets state that water will be provided to the project by the Lewes Board of Public Works via a public water system. Our records indicate that the project is located within the public water service area granted to the Lewes Board of Public Works under Certificate of Public Convenience and Necessity 01-CPCN-07.

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 take approximately 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 is an Underground Storage Tank associated with the Adkins Oil Company, located within 1000 feet of the proposed project. Should you have any questions concerning these comments, please contact Rick Rios at (302) 739-9944.

Sediment and Stormwater Management.

- A detailed sediment and stormwater plan will be required prior to any land disturbing activity taking place on the site. The plan review and approval as well as construction inspection will be coordinated through the Division of Soil and Water Conservation Sediment and Stormwater Program. Contact Elaine Webb with the Sediment and Stormwater Program at (302) 739-9921, for details regarding submittal requirements and fees. It is strongly recommended that you contact the reviewing agency to schedule a pre-application meeting with the Sediment and Stormwater Section 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.

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:

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 1113 – Open Burning	<ul style="list-style-type: none"> • Prohibit open burns statewide during the Ozone Season from May 1-Sept. 30 each year. • Prohibit the burning of land clearing debris. • Prohibit the burning of trash or building materials/debris.
7 DE Admin. Code 1135 – Conformity of General Federal Actions to the State Implementation Plan	<ul style="list-style-type: none"> • Require, for any “federal action,” a conformity determination for each pollutant where the total of direct and indirect emissions would equal or exceed any of the de minimus levels (See Section 3.2.1)
7 DE Admin. Code 1141 – Limiting Emissions of Volatile Organic Compounds from Consumer and Commercial Products	<ul style="list-style-type: none"> • Use structural/ paint coatings that are low in Volatile Organic Compounds. • Use covers on paint containers when paint containers are not in use.
7 DE Admin. Code 1144 – Control of Stationary Generator Emissions	<ul style="list-style-type: none"> • Ensure that emissions of nitrogen oxides (NO_x), non-methane hydrocarbons (NMHC), particulate matter (PM), sulfur dioxide (SO₂), carbon monoxide (CO), and carbon dioxide (CO₂) from emergency generators meet the emissions limits established. (See section

	<p>3.2).</p> <ul style="list-style-type: none"> • Maintain recordkeeping and reporting requirements.
<p>7 DE Admin. Code 1145 – Excessive Idling of Heavy Duty Vehicles</p>	<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>.

Hazardous Waste.

If it is determined by the Department that there was a release of a hazardous substance on the property in question and the Department requires remediation pursuant to the Hazardous Substance Cleanup Act, the provisions of 7 Del.C., Chapter 91, Delaware Hazardous Substance Cleanup Act and the Delaware Regulations Governing Hazardous Substance Cleanup shall be followed.

There is one Site Investigation and Restoration Section (SIRS) site found within a half mile radius of the proposed project.

Trails & Pathways Georgetown/Lewes (DE-1546) is located 0.15 miles south of the proposed project.

- The Site is a 16 mile corridor from Georgetown to Cape Henlopen. The corridor follows the old Queen Anne’s railroad.
- The area was identified in the 2006 Statewide Rails to Trails/Rails with Trails master plan.
- The Work Plan for the project was approved in August of 2013 followed by a Memorandum of Understanding between the Division of Waste and Hazardous Substances and Division of Parks and Recreation.
- The Proposed Plan was published in April 2014 followed by the Final Plan in June 2014.
- The PP/FP required that the Site have an asphalt path with clean fill and geotextile marker fabric. An Environmental Covenant is also to be recorded for the Site.
- The Site is currently being redeveloped.

Delaware State Fire Marshall’s Office – Contact Duane Fox 739-4394

At the time of formal submittal, the applicant shall provide; completed application, fee, and three sets of plans depicting the following in accordance with the Delaware State Fire Prevention Regulation (DSFPR):

- **Fire Protection Water Requirements:**
 - Water distribution system capable of delivering at least 1000 gpm for 1-hour duration, at 20-psi residual pressure is required. Fire hydrants with 800 feet spacing on centers.

- Where a water distribution system is proposed for an educational site, the infrastructure for fire protection water shall be provided, including the size of water mains for fire hydrants and sprinkler systems.
- **Fire Protection Features:**
 - All structures over 10,000 sqft aggregate will require automatic sprinkler protection installed.
 - Buildings greater than 10,000 sqft, 3-stories or more, over 35 feet, or classified as High Hazard, are required to meet fire lane marking requirements
 - Show Fire Department Connection location (Must be within 300 feet of fire hydrant), and detail as shown in the DSFPR.
 - Show Fire Lanes and Sign Detail as shown in DSFPR
- **Accessibility:**
 - All premises, which the fire department may be called upon to protect in case of fire, and which are not readily accessible from public roads, shall be provided with suitable gates and access roads, and fire lanes so that all buildings on the premises are accessible to fire apparatus.
 - Fire department access shall be provided in such a manner so that fire apparatus will be able to locate within 100 ft. of the front door.
 - The use of speed bumps or other methods of traffic speed reduction must be in accordance with Department of Transportation requirements.
 - The local Fire Chief, prior to any submission to our Agency, shall approve in writing the use of gates that limit fire department access into and out of the development or property.
- **Gas Piping and System Information**
 - Provide type of fuel proposed, and show locations of bulk containers on plan.
- **Required Notes:**
 - Provide a note on the final plans submitted for review to read “ All fire lanes, fire hydrants, and fire department connections shall be marked in accordance with the Delaware State Fire Prevention Regulations”
 - Proposed Use
 - Alpha or Numerical Labels for each building/unit for sites with multiple buildings/units
 - Square footage of each structure (Total of all Floors)
 - National Fire Protection Association (NFPA) Construction Type
 - Maximum Height of Buildings (including number of stories)
 - Note indicating if building is to be sprinklered
 - Name of Water Provider
 - Letter from Water Provider approving the system layout
 - Provide Lock Box Note (as detailed in DSFPR) if Building is to be sprinklered
 - Provide Road Names, even for County Roads

High Performance School.

- DNREC encourages the school district to use High Performance School standards in planning, design, and construction of the proposed school project. High performance schools provide high quality learning environments, conserve natural resources, consume less energy and are easier to maintain, while providing an effective tool for teaching about environmental responsibility.

Creating a high performance school is not difficult, but it requires an integrated, “whole building,” team approach to the design process. Key systems and technologies must be considered together, from the beginning of the design process, and optimized based on their combined impact on the comfort and productivity of students and teachers. High performance schools take advantage of recent advances in energy efficiency and incorporate heating, cooling, and lighting systems that produce the highest comfort levels for the least cost. Daylight is brought into the school to enhance the learning environment and decrease the need for electrical lighting. The building shell integrates the most effective combination of insulation, glazing, and thermal mass to ensure energy efficiency and occupant comfort. Modern plumbing fixtures and innovative water use strategies combine to reduce water consumption and buildings are commissioned to ensure building performance. Furthermore, in high performance schools, Best Management Practices (BMP) in site design and stormwater management such as constructed wetlands, vegetated buffers, vegetated roofs, and rain gardens offer resources for hands on educational opportunities.

In order to achieve a high performance school, consider following recommendations:

1. Design with the “Whole Building” in mind,
2. Set performance goals early,
3. Choose and develop the site wisely utilizing optimum orientation, maximizing natural resource preservation and reducing heat island effect,
4. Protect indoor air quality,
5. Optimize acoustics,
6. Incorporate daylighting,
7. Incorporate high performance electric lighting and controls,
8. Install high performance HVAC strategies,
9. Incorporate water conservation measures, and
10. Commission the school after construction.

The DNREC Division of Energy and Climate is interested in working with the Cape Henlopen School District to provide assistance and facilitate resources in design and planning of the proposed school project.

Additional information on TMDLs and water quality.

- In response to concerns about the need for reducing nonpoint source nutrient (nitrogen and phosphorus) and bacterial pollutants to levels sufficient to meet the TMDL reduction requirements prescribed for waters of the greater Broadkill River watershed, a multifaceted and comprehensive process known as a Pollution Control Strategy (PCS) was developed. Specifically, a PCS is a combination of best management practices and

control technologies that reduce nutrient and bacterial pollutant runoff loading in waters of a given watershed to level(s) consistent with the TMDL reduction levels specified for that watershed. The PCS for the Broadkill River watershed consists of recommendations from the following three areas: agriculture, stormwater, and wastewater.

Additional information about Broadkill River PCS can be reviewed at the follow web link:

<http://www.dnrec.delaware.gov/swc/wa/Pages/WatershedManagementPlans.aspx>

In further support of the PCS, the applicant is also strongly urged to reduce nutrient and bacterial pollutants through voluntary commitment to the implementation of the following recommended BMPs, which would:

- Preserve and/or maintain as much of the existing open space as possible; we further suggest additional native tree, shrub and/or native herbaceous vegetation plantings, wherever possible.
- Maintain a vegetated buffer of at least 100 feet from the adjoining wetlands and waterbodies. Based on a review of existing buffer research by Castelle et al. (Castelle, A. J., A. W. Johnson and C. Conolly. 1994. *Wetland and Stream Buffer Requirements – A Review*. J. Environ. Qual. 23: 878-882.), an adequately-sized buffer that effectively protects wetlands and streams, in most circumstances, is about 100 feet in width. In recognition of this research and the need to protect water quality, the DNREC Watershed Assessment Section recommends that the applicant maintain/establish a minimum aforementioned 100-foot vegetated buffer (planted in native vegetation) from all waterbodies (including ditches) and all non-tidal and tidal wetlands (i.e., a USACE approved field wetlands delineation for non-tidal wetlands and State approved wetlands delineation for tidal wetlands).
- Calculate post-construction surface imperviousness with all forms of created (or constructed) surface imperviousness (e.g., rooftops, driveways, parking lots, sidewalks, open-water storm water management structures, ponds, and roads) included in the calculation. Omission of any of the above-stated forms of surface imperviousness will result in an underestimate of the actual post-development surface imperviousness and the associated environmental impacts.
- Employ green-technology storm water management and rain gardens (in lieu of open-water management structures) as BMPs to mitigate or reduce nutrient and bacterial pollutant runoff. Please contact Lara Allison at (302) 739-9939 for further information about the possibility of installing rain gardens on this parcel.
- Use pervious paving materials instead of conventional paving materials (e.g., asphalt or concrete) to help reduce the amount of water and pollutant runoff draining to adjoining streams and wetlands. Pervious pavers are especially recommended for areas designated for parking.
- Assess nutrient and bacterial pollutant loading at the preliminary project design phase. To this end, the Watershed Assessment Section has developed a methodology known as the

“Nutrient Load Assessment protocol.” The protocol is a tool used to assess changes in nutrient loading (e.g., nitrogen and phosphorus) resulting from the conversion of individual or combined land parcels to a changed land use(s); thus providing applicants and governmental entities with quantitative information about the project’s impact(s) on baseline water quality. We strongly encourage the applicant/developer use this protocol to help them design and implement the most effective BMPs. Please contact John Martin or Jen Walls of the Division of Watershed Stewardship at (302) 739-9939 for more information on the protocol.

Additional information on hazardous waste.

- DNREC strongly recommends that the land owner perform environmental due diligence of the property by performing a Phase I Environmental Site Assessment (including a title search to identify environmental covenants) in accordance to Section 9105(c) (2) of the Delaware Hazardous Substance Cleanup Act (HSCA). While this is not a requirement under HSCA, it is good business practice and failure to do so will prevent a person from being able to qualify for a potential affirmative defense under Section 9105(c) (2) of HSCA.

Additional remediation may be required if the project property or site is re-zoned by the county.

Should a release or imminent threat of a release of hazardous substances be discovered during the course of development (e.g., contaminated water or soil), construction activities should be discontinued immediately and DNREC should be notified at the 24-hour emergency number (800) 662-8802. SIRB should also be contacted as soon as possible at (302) 395-2600 for further instructions.

Additional information on air quality.

- DNREC encourages developers and builders to consider all sustainable growth practices in their design, but we believe, however, that the air quality impacts associated with the project should be completely considered. New homes, businesses, and schools may emit, or cause to be emitted, air contaminants into Delaware’s air, which will negatively impact public health, safety and welfare. These negative impacts are attributable to:
 - Emissions that form ozone and fine particulate matter; two pollutants relative to which Delaware currently violates federal health-based air quality standards,
 - The emission of greenhouse gases which are associated with climate change, and
 - The emission of air toxics.

Air emissions generated 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 needed to support the facility, and
- All transportation activity.

Based on the information provided, the three air emissions components (i.e., area, electric power

generation, and mobile sources) could not be quantified. DAQ was able, however, to quantify the mobile emissions based on the proposed daily trip data presented in each application and data taken from the ITE Trip Generation Manual, 8th Edition. Each PLUS project anticipates 200 vehicle trips per day for a new school or an increase of 200 vehicle trips per day for a renovated school. Table 2 – Projected Air Quality Emissions represents the actual impact the Cape Henlopen School District may have on air quality.

Emissions Attributable to Cape Henlopen School District (Tons per Year)	Volatile Organic Compounds (VOC)	Nitrogen Oxides (NO _x)	Sulfur Dioxide (SO ₂)	Fine Particulate Matter (PM _{2.5})	Carbon Dioxide (CO ₂)
Mobile Source emissions	0.66	0.88	*	*	*

(*) Indicates data is not available.

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

The DNREC Division of Air Quality (DAQ) encourages sustainable growth practices that:

- Control sprawl;
- Preserve rural and forested areas;
- Identify conflicting land use priorities;
- Encourage growth on previously developed sites and denser communities;
- Coordinate transportation, housing, environment, and climate protection plans with land use plans; and
- Demonstrate that communities can achieve the qualities of privacy, community, and contact with nature without degrading the natural environment or generating unacceptable environmental costs in terms of congestion, use of natural resources, or pollution.

Additional measures may be taken to substantially reduce the air emissions identified above.

These measures include:

- **Constructing with only energy efficient products.** Energy Star qualified products are up to 30% more energy efficient. Savings come from building envelope upgrades, high performance windows, controlled air infiltration, upgraded heating and air conditioning systems, tight duct systems and upgraded water-heating equipment. Every percentage of energy efficiency translates into a percent reduction in pollution. The Energy Star Program is an excellent way to save on energy costs and reduce air pollution.
- **Offering geothermal and/or photo voltaic energy options.** These systems can significantly reduce emissions from electrical generation and from the use of oil or gas heating equipment.

- **Constructing with high albedo, high solar reflectance materials.** This includes roofing and hardscape. These materials help to reduce heat island impacts and, by extension, help to minimize the potential for localized ground-level ozone formation. These materials also help reduce demands on air conditioning systems and save on energy costs.
- **Providing shade for parking lot areas.** 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 stormwater.
- **Encouraging the use of safe multimodal transportation.** This measure can significantly reduce mobile source emissions. **For every vehicle trip that is replaced by the use of a sidewalk or bike path, 7 pounds of VOC and 11.5 pounds of NOx are reduced each year.**
- **Using retrofitted diesel engines during construction.** This includes equipment that is on-site as well as equipment used to transport materials to and from site.
- **Using pre-painted/pre-coated flooring, cabinets, fencing, etc.** These measures can significantly reduce the emission of VOCs from typical architectural coating operations.
- **Planting trees in vegetative buffer areas.** Native trees reduce emissions by trapping dust particles and replenishing oxygen. 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.

This is a partial list, and there are additional things that can be done to reduce the impact of the project. The applicant should submit a plan to the DNREC DAQ which address the above listed measures, and that details all of the specific emission mitigation measures that will be incorporated into the Wilmington Country Club project. The DAQ point of contact is Deanna Cuccinello, and she may be reached at (302) 739-9402.

Delaware State Fire Marshall's Office – Contact Duane Fox 739-4394

- Preliminary meetings with fire protection specialists are encouraged prior to formal submittal. Please call for appointment. Applications and brochures can be downloaded from our website: www.statefiremarshal.delaware.gov technical services link, plan review, applications or brochures.

State Historic Preservation Office – Contact Terrence Burns 736-7404

- The Shields Elementary School, c. 1965, has not been surveyed by our office, so its

eligibility for the National Register of Historic Places is not known. The proposed addition should not affect such eligibility as long as it is in keeping with the scale and materials of the original section. The area proposed for the construction has been disturbed by playground equipment placement, so there is little potential for an intact archaeological site here.

Department of Agriculture – Contact Scott Blaier 698-4529

- The Department of Agriculture favors replacing or expanding the school on the current site as opposed to developing new land for a school, especially farmland.

Department of Education-Contact Karen Field Rogers 857-3392

- The DOE will continue to work with the district, architect, site engineer, municipal government and various state agencies regarding the project. The DOE reserves the right to provide continued and on-going comments and input as the project develops.

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

Sincerely,

A handwritten signature in cursive script that reads "Constance C. Holland".

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

CC: Sussex County