



STATE OF DELAWARE
EXECUTIVE DEPARTMENT
OFFICE OF STATE PLANNING COORDINATION

March 23, 2016

Mr. Garth Jones, P.E.
Becker Morgan Group, Inc.
309 S. Governors Ave.
Dover, DE 19904

RE: PLUS review 2016-02-07; Chesapeake Utilities

Dear Garth:

Thank you for meeting with State agency planners on February 24, 2016 to discuss the proposed plans for the Chesapeake Utilities project. According to the information received, you are seeking review of a site plan for 55,727 square feet of commercial space on 20.6 acres in Dover.

Please note that changes to the plan, other than those suggested in this letter, could result in additional comments from the State. Additionally, these comments reflect only issues that are the responsibility of the agencies represented at the meeting. **The developers will also need to comply with any Federal, State and local regulations regarding this property. We also note that as Kent County is the governing authority over this land, the developers will need to comply with any and all regulations/restrictions set forth by the County.**

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.

Code Requirements/Agency Permitting Requirements

Department of Transportation – Contact Bill Brockenbrough 760-2109

- Per Section 2.2.2.1 of the *Development Coordination Manual*, Traffic Impact Studies (TIS) are warranted for developments generating more than 500 vehicle trip ends per day or 50 vehicle trip ends per hour in any hour of the day. As discussed in the

attached letters, however, we have determined that a TIS is not needed in this instance. To further document our position, we offer the following discussion.

The subject development would generate less traffic than the use already approved for the subject land. The subject development would occupy seven lots in a previously approved office park, the Stover Professional Campus. That park was the subject of a 2006 TIS and was treated in the TIS as an 85-room hotel, a 7,500 square foot high-turnover sit-down restaurant and 230,600 square feet of office space, of which 150,700 square feet would have been built where the subject development is proposed. From the PLUS application, we understand that 55,727 square feet of commercial building is proposed treating that floor area as office space and the proposed warehouse and vehicle storage building as accessory uses that generate no trips of their own yields the comparison shown in the table below.

Land Use	ITE Code	Daily Weekday Traffic	AM Peak Hour		PM Peak Hour	
			In	Out	In	Out
Approved – 150,700 sf General Office	710	1,793	234	32	42	205
Proposed – 55,727 sf General Office	710	842	106	14	24	117

The 2006 TIS found acceptable Levels of Service in the study area through 2010 and identified no need for off-site improvements.

Traffic volumes on Bay Road, as counted immediately north of Stover Boulevard, have decreased since 2006, rather than increasing as the TIS predicted. See the table below.

Peak Hour	Direction	2006 Volume	2014 Volume
AM	Northbound	1,445	1,109
	Southbound	748	724
PM	Northbound	1,391	1,076
	Southbound	1,840	1,389

- Referring to Section 3.4.2 of the Development Coordination Manual, the Initial Stage review fee shall be assessed to this project.
- In accordance with Section 3.4 of the Development Coordination Manual, a record plan shall be prepared prior to issuing “Letter of No Objection”. The following information will be required for the “Letter of No Objection” review:
 - Initial Stage Fee Calculation Form
 - Initial Stage Review Fee
 - Gate-Keeping Checklist – Site Plan

- Design Checklist - Record Plan
 - Sight Distance Spreadsheet
 - Owners and Engineers' name and e-mail address
 - Record Plan
 - Conceptual Entrance Plan
 - Submission of the Area-Wide Study Fee (If applicable)
- Referring to Section 3.4.2.1 of the Development Coordination Manual, the following items, among other things, are required on the Record Plan:
 - A Traffic Generation Diagram. See Figure 3.4.2-a for the required format and content.
 - Depiction of all existing entrances within 200 feet of the proposed frontage, in this case the campus' frontage on Bay Road.

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

The Department envisions a Delaware that offers a healthy environment where people embrace a commitment to the protection, enhancement and enjoyment of the environment in their daily lives; where Delawareans' stewardship of natural resources ensures the sustainability of these resources for the appreciation and enjoyment of future generations; and where people recognize that a healthy environment and a strong economy support one another.

Executive Summary.

Upon reviewing the Chesapeake Utilities project, DNREC has identified that the proposed project is located in a developing area and that opportunities exist to reduce the environmental impact and provide additional energy efficiency alternatives on-site. The State of Delaware is threatened by climate change and has a goal of reducing greenhouse gas emissions by 30% by 2030. Appropriate development and re-development that provides access to public transportation, opportunities to walk and bike to shopping and recreation, and that employs energy efficient building standards are among key strategies to meet these goals.

We encourage the applicant to provide sidewalks and bike racks to promote walkable employee and public access. We also encourage the use of high performance building standards and consideration of alternative energy sources including use of solar or geothermal. DNREC is supportive of the applicant's intent to include a natural gas fueling station within its design and would further recommend installing electric vehicle charging stations for potential public or employee use. Additionally, an abundant use of native vegetation and shade trees throughout the landscape, as well as pervious pavement and green infrastructure technologies would serve to absorb carbon dioxide, protect water quality and provide relief to employees/clients on hot days.

The following pages provide information about applicable regulations and detailed recommendations associated with this project from various DNREC Divisions. We would like to

be a partner in creating sustainable development that protects and highlights the environment as a natural amenity of the landscape. The Department has resources and expertise that are available to help make this a reality, often at no expense to the landowner. Contact information for specific offices are listed below or you can contact Michael Tholstrup at (302) 735-3352.

TMDLs.

- The project is located in the greater Delaware River and Bay drainage area, specifically within the St. Jones 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 St. Jones River watershed calls for a 40 percent reduction in nitrogen and phosphorus from baseline conditions. The TMDL also calls for a 90 percent reduction in bacteria from baseline conditions.

Water Supply.

- The project information sheets state water will be provided to the project by the City of Dover via a public water system. Our records indicate that the project is located within the public water service area granted to the City of Dover under Certificate of Public Convenience and Necessity 90-CPCN-07.

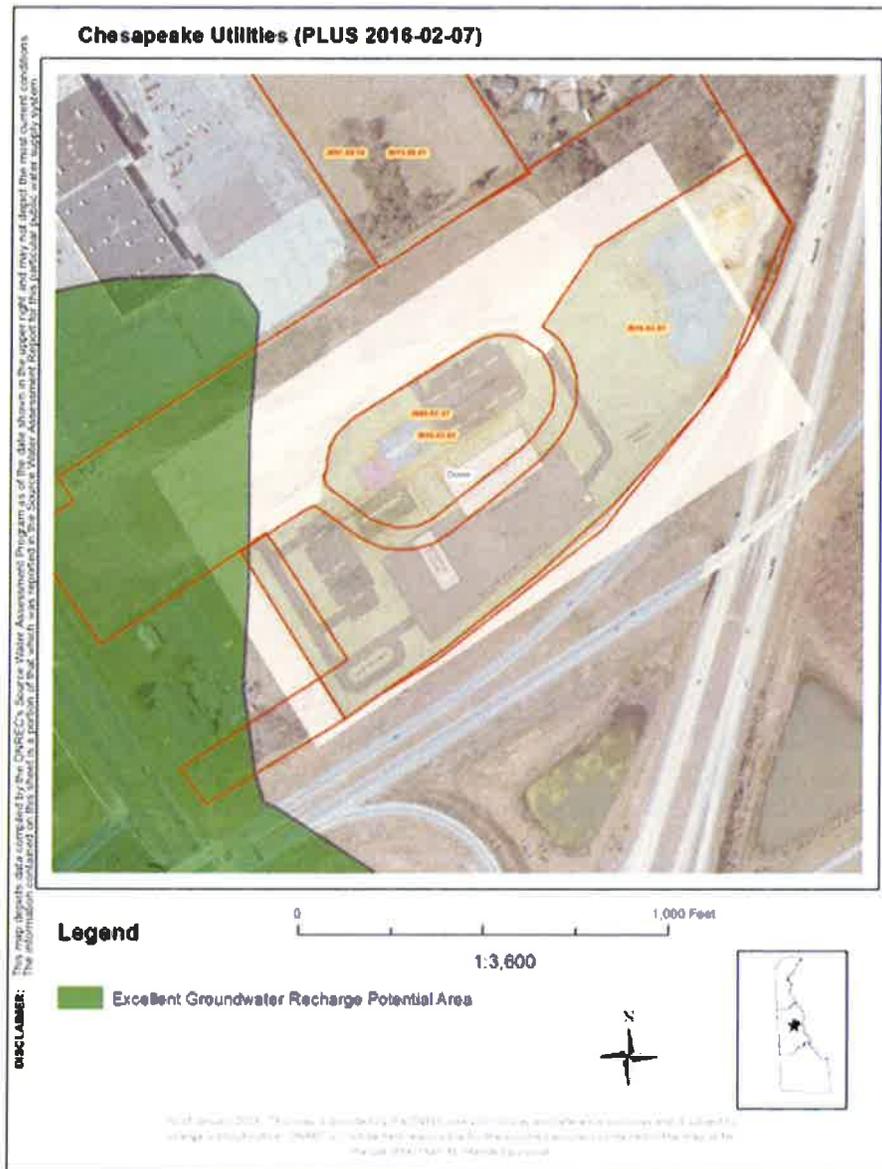
Should dewatering points be needed during any phase of construction, a dewatering well construction permit must be obtained from the Water Supply Section prior to construction of the well points. In addition, a water allocation permit will be needed if the pumping rate will exceed 50,000 gallons per 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 a Site Investigation and Restoration Section (SIRS) site associated with 605 South Bay Road, located within 1000 feet of the proposed project. Should you have any questions concerning these comments, please contact Rick Rios at (302) 739-9944.

Source Water Protection Areas.

- The DNREC Water Supply Section, Groundwater Protection Branch has determined that a small portion of the project falls within an excellent groundwater recharge area (see map). No delineated wellhead protection areas were identified.



Sediment and Erosion Control/Stormwater Management.

- A detailed sediment and stormwater plan will be required prior to any land disturbing activity taking place on the site. Contact the reviewing agency to schedule a pre-application meeting to discuss the sediment and erosion control and stormwater management components of the plan. The site topography, soils mapping, pre- and post-development runoff, and proposed method(s) and location(s) of stormwater management should be brought to the meeting for discussion. The plan review and approval as well as construction inspection will be coordinated through the Kent Conservation District. Contact Jared Adkins, Program Manager, at (302) 741-2600, ext. 3, for details regarding submittal requirements and fees.

Air Quality

- 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. 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:

Table 1: Potential Regulatory Requirements	
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 3.2). • Maintain recordkeeping and reporting requirements.
7 DE Admin. Code 1145 – Excessive Idling of Heavy Duty Vehicles	<ul style="list-style-type: none"> • Restrict idling time for trucks and buses having a gross vehicle weight of over 8,500 pounds to no more than three minutes.

For a complete listing of all Delaware applicable regulations, please look at our website:
<http://www.dnrec.delaware.gov/Air/Pages/Air-Regulations.aspx>.

Hazardous Waste Sites.

- If DNREC's Site Investigation and Restoration Section (SIRS) has determined 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 are two SIRS sites within a half mile radius of the proposed project.

The proposed project is located on the 605 South Bay Road Site (DE-1564):

- The Site was previously used as orchards for at least 60 years. The main farm operations were west of the orchard and consisted of several buildings with open space. Orchard operations began diminishing in the early 1990's.
- A Phase I Investigation was conducted in July 2013 and identified potential impacts to soil and groundwater from the orchard business. The Site joined the Voluntary Clean-up Program (VCP) in December 2013.
- A Remedial Investigation was conducted and approved in June 2014.
- The Proposed Plan and Final Plans were published in July and August 2014. The Site was divided into two Operating Units (OUs). OU-1 is restricted to non-residential.
- Both OUs were issued a Certificate of Completion of Remedy (COCR) in February and July 2014.

Blue Hen Drum Site (DE-1480) is located north adjacent to the proposed project:

- In August 2009, 63 drums were uncovered during the development of the currently existing apartments. The majority of the drums contained petroleum based liquids.
- It was believe that the drums were buried there during the construction of the Blue Hen Mall in the 1960s.
- From August to October 2009, all the drums and contaminated soil were removed and properly disposed offsite.
- In August 2012, DNREC issued a No Further Action designation and closed and archived the Site.

Tank Management.

- If a release of a Regulated Substance occurs at the proposed project site, compliance of 7 Del.C., Chapter 60; 7 Del.C., Chapter 74; and DE Admin. Code 1351, State of Delaware *Regulations Governing Underground Storage Tank Systems* (the UST Regulations) is required.

The following (LUST) project is located within a quarter mile from the proposed project area:

Kings Air Base Mobil, Facility ID: 1-000206 , Project: K8706029, (Inactive)

Shore Stop #1230, Facility ID: 1-000198, Project: K1112156 (Inactive)

Per the UST Regulations, Part E, § 1. Reporting Requirements: any indication of a Release of a Regulated Substance that is discovered by any Person, including but not limited to environmental consultants, contractors, utility companies, financial institutions, real estate transfer companies, UST Owners or Operators, or Responsible Parties shall be reported within 24 hours to:

- The Department's 24-hour Release Hot Line by calling (800) 662-8802; and
- The DNREC Tank Management Section by calling (302) 395-2500.

For more information, please visit online:

<http://www.dnrec.delaware.gov/tanks/Pages/default.aspx> or contact Ross D. Elliott at DNREC-TMS with further questions at Ross.Elliott@state.de.us, (302)-395-2500.

State Historic Preservation Office – Contact Terrence Burns 736-7404

- There are no known archaeological sites or National Register-listed property on this parcel. However, if any development or construction project proceeds, the developer should be aware of the Unmarked Human Burials and Human Skeletal Remains Law, which is in, Chapter 54, of Title 7, of the Delaware Code.

Abandoned or unmarked family cemeteries are very common in the State of Delaware. They are usually in rural or open space areas, and sometimes near or within the boundary of an historic farm site. Even a marked cemetery can frequently have unmarked graves or burials outside of the known boundary line or limit. Disturbing unmarked graves or burials triggers the Delaware's Unmarked Human Burials and Human Skeletal Remains Law (7 Del. C. Ch. 54), and such remains or discoveries can result in substantial delays while the procedures required under this law are carried out. If there is a discovery of any unmarked graves, burials or a cemetery, it is very costly to have them archaeologically excavated and the burials moved. The Division of Historical & Cultural Affairs recommends that owners and/or developers have a qualified archaeological consultant investigate their project area, to the full extent, to see if there is any unmarked cemetery, graves, or burial sites. In the event of such a discovery, the Division of Historical & Cultural Affairs also recommends that the plans be re-drawn to leave the full extent of the cemeteries or any burials on its own parcel or in the open space area of the development, with the responsibility for its maintenance lying with the landowner association or development. If you would like to know more information pertaining to unmarked human remains or cemeteries, please go to the following websites for additional information: www.history.delaware.gov/preservation/umhr.shtml and www.history.delaware.gov/preservation/cemeteries.shtml.

Therefore, prior to any demolition or ground-disturbing activities, the developer may want hire an archaeological consultant, to examine the parcel for archaeological resources, as well a cemetery or unmarked human remains.

- If there is any federal involvement with the project, in the form of licenses, permits, or funds, the federal agency, often through its client, is responsible for complying with Section 106 of the National Historic Preservation Act (36 CFR 800) and must consider their project's effects on any known or potential cultural or historic resources. Owners and developers who may plan to apply for an Army Corps of Engineers permit or for federal funding, such as HUD or USDA grants, should be aware of the National Historic Preservation Act of 1966 (as amended). Regulations promulgated for Section 106 of this Act stipulate that no ground-disturbing or demolition activities should take place before the Corps or other involved federal agency determines the area of potential effect of the project undertaking. These stipulations are in place to allow for comment from the public, the Delaware State Historic Preservation Office, and the Advisory Council for Historic Preservation about the project's effects on historic properties. Furthermore, any preconstruction activities without adherence to these stipulations may jeopardize the issuance of any permit or funds. If you need further information or additional details pertaining to the Section 106 process and the Advisory Council's role, please review the Advisory Council's website at www.achp.gov.

Recommendations/Additional Information

Department of Transportation – Contact Bill Brockenbrough 760-2109

- According to our records, Stover Boulevard and Krisko Circle have not been accepted for public maintenance yet. When they are accepted, it would normally be by the City of Dover. DelDOT does not accept subdivision streets within municipalities for State maintenance. While it is therefore not a DelDOT requirement, we would recommend that the City require construction of a sidewalk along Stover Boulevard from the existing shared use path on Bay Road to the site and then one or more walkways into the site from the sidewalk. It would be reasonable to place at least part of that sidewalk on the north side of Stover Boulevard to avoid harming the trees on the American Legion property and to take advantage of the existing sidewalk fronting the hotel property.
- Because the proposed development would generate more than 200 vehicle trips per day, a Pre-Submittal Meeting is required before plans are submitted for review. The form needed to request this meeting and guidance on what will be covered there and how to prepare for it is located at http://www.deldot.gov/information/business/subdivisions/Meeting_Request_Form.pdf.

- Please be advised that as of August 1, 2015, all new plan submittals and re-submittals, including major, minor and commercial plans, shall now be uploaded via the PDCA (Planning Development Coordination Application) with any review fee paid online via credit card or electronic check. Guidance on how to do this is available on our website at <http://www.delDOT.gov/information/business/subdivisions/>
- Be advised that the Standard General Notes have been updated and posted to the DelDOT website. Please begin using the new versions and look for the revision date of January 28, 2016. The notes can be found at http://www.delDOT.gov/information/business/subdivisions/Sheet_Notes.doc?012816.

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

Soils Assessment.

- Based on soils survey mapping update, the soils mapping units mapped on subject parcel are Nassawango (NsB), Pineyneck (PyB), and Fallsington (FgA). Nassawango and Pineyneck are moderately well-drained soil mapping units with moderate limitations for development. Fallsington is a poorly-drained wetland associated (hydric) soil mapping unit with severe limitations for development (considered unsuitable).

We strongly discourage building on hydric soils (e.g., Fallsington) because they are functionally important source of water storage (functions as a “natural sponge”); the loss of water storage through excavation, filling, or grading of intact native hydric soils increases the probability for more frequent and destructive flooding events. The probability for flooding is further compounded by increases in surface imperviousness as building density in the area increases over time. Moreover, destruction of hydric soils increases the amount of pollutant runoff (i.e., hydric soils sequester and detoxify pollutants) which contributes to lower observed water quality in regional waterbodies and wetlands.

TMDL compliance through the PCS.

- A Pollution Control Strategy (PCS) to achieve the required TMDL nutrient and bacterial load reduction requirements has been established for the St. Jones watershed. Additional information on the St. Jones PCS strategies can be found here: <http://www.dnrec.delaware.gov/swc/wa/Pages/WatershedManagementPlans.aspx>

In support of the PCS, the applicant is strongly urged to reduce nutrient and bacterial pollutants through the implementation of the following recommended BMPs:

- Maintain the existing forest cover in the northeast portion of subject project. We suggest preserving additional areas of open space via additional plantings of native tree, shrubs, or herbaceous vegetation, wherever possible.

- Hire a licensed soil scientist to conduct a field-based delineation of the hydric soils and/or wetlands on this site. A list of licensed soil scientists can be obtained from the Ground Water Discharges Branch; the Branch can be reached by phone at (302) 739-9947. According to the PLUS application, a wetlands delineation was not conducted nor approved by the United States Army Corps of Engineers. We strongly recommend that the applicant obtain approval by the USACE before commencing any construction activities.
- Maintain a vegetated buffer of at least 100 feet from the adjoining wetlands and waterbodies. 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 Watershed Assessment Section recommends that the applicant maintain/establish this aforementioned 100-foot buffer width (planted in native vegetation) from all waterbodies, non-tidal and tidal wetlands (i.e., ponds, USACE approved field wetlands delineation for non-tidal wetlands and State approved wetlands delineation for tidal wetlands and other State-regulated 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 for 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; 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 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 tank management.

- When contamination is encountered, PVC pipe materials should be replaced with ductile steel and nitrile rubber gaskets in the contaminated areas.

If any aboveground storage tanks (ASTs) less than 12,500 gallons are installed, they must be registered with the TMS. If any ASTs greater than 12,500 gallons are installed, they are also subject to installation approval by the TMS.

Additional information on hazardous waste sites.

- 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.

- New homes 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 from new homes include emissions from the following activities:

- Area sources such as painting, maintenance equipment and the use of consumer products like roof coatings and roof primers.
- The generation of electricity needed to support the new homes, and
- All transportation activity.

Recommendations: 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.

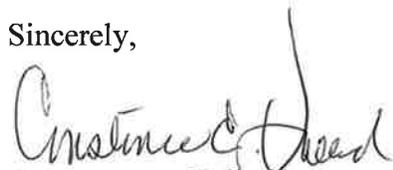
- **Offering geothermal and/or photo voltaic energy options.** These systems can significantly reduce emissions from electrical generation and from the use of oil or gas heating equipment.
- **Constructing with high albedo, high solar reflectance materials.** This includes roofing and hardscape. These 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 infrastructure for plug-in vehicles.** Such measures may entice employees to purchase electric vehicles if the electrical outlets are available as this will help minimize vehicle emissions.
- **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 Division of Air Quality (DAQ) which addresses the above listed measures, and that details all of the specific emission mitigation measures that will be incorporated into the Chesapeake Utilities project. The DAQ point of contact is Deanna Cuccinello, (302) 739-9402.

Following receipt of this letter and upon filing of an application with the local jurisdiction, the applicant shall provide to the local jurisdiction and the Office of State Planning Coordination a written response to comments received as a result of the PLUS process, noting whether comments were incorporated into the project design or not and the reason therefore.

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

Sincerely,

A handwritten signature in cursive script, appearing to read "Constance C. Holland".

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

CC: City of Dover