



March 22, 2024

Delaware Coastal Programs  
100 W. Water Street, Ste. 7B  
Dover, Delaware 19904

**Re: Delaware Coastal Management Program Consistency Review for the Construction of townhomes for Newark Affordable Homeownership Project built by Habitat for Humanity of New Castle County.**

**Project Name: New Castle Presbytery**

AZ-RI Consultants is completing an Environmental Review on behalf of Habitat for Humanity of New Castle County (HFHNCC).

HFHNCC is proposing to build 14-15 new affordable homeownership opportunities for low-income families earning 35%-80% of the Area Median Income (AMI). The proposed project will include construction of approximately fourteen to fifteen two-story attached townhomes located at **2303 Glasgow Avenue, Newark, Delaware 19702.**

The site is currently owned by the New Castle Presbytery and will eventually be subdivided into 14 lots. The Subject Property is currently a grass and tree covered lot with a fenced garden area in the eastern area and a paved parking area on the western border.

HFHNCC utilizes conventional stick framed houses on a poured concrete crawl space foundation. Stick framing includes all parts of the framed building structure, from roofs to trusses to walls, and are traditionally constructed on site. These homes will be two story attached townhomes, with brick facades to comply with its location in a historic district (Aiken's Tavern). HFHNCC acts as the general contractor both in the site development and the construction of the homes. HFHNCC utilizes standard townhome models as specified below:

- 2 bedroom – 16' x 35'
- 3 bedroom – 18' x 35'
- 4 bedroom – 20 x 36'

Once complete, the homes will be fully equipped with ENERGY STAR-rated appliances, 2-4 bedrooms, up to 2.5 bathrooms, and on-site parking. The development of the property includes the installation of sewer, water, electricity, curbing and new streets.



AZ-RI has reviewed the above-reference project and has determined it to be consistent with the Delaware Coastal Management Program. This determination is based upon the following findings: the project is located in an existing neighborhood in the City of Newark, DE, and will connect to municipal sewer and water.

We are requesting your review and concurrence with our determination for this new construction project pursuant to Coastal Zone Management Act regulations (15 CFR-Part 930). We look forward to working with your office during this consultation. Please do not hesitate to reach out with any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Hannah Wertz', is written over a light blue horizontal line.

Hannah Wertz  
AZ-RI Consultants

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**Attachments:**

1. Subject Property Description Map with Photos
2. Project Summary
3. Coastal Zone Management Act Federal Consistency Form



1 Subject Property Boundaries and nearby wetlands (New Castle GIS Mapper)



2 Project Concept Plan (Apex Engineering Inc., 2023)



**AZARI**  
CONSULTANTS

Presbytery (14 Townhomes)  
2303 Glasgow Ave  
Newark, DE 19702

Project Number:  
240227-1

**Figure 1**

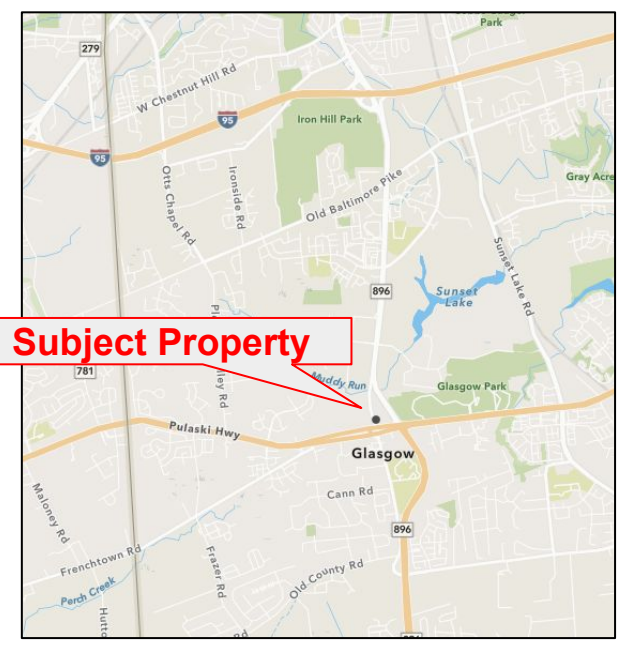
**Subject Property Description**

**Legend**

- Subject Property Boundary
- Other Property of Interest

State Wetlands

National Wetlands



3 Subject Property Vicinity (New Castle GIS Mapper)



1. Southern Area



2. Fenced Garden (Eastern Area)



3. Northeast Area



4. Northwest Area



5. Northwest Debris



6. Adjoining Wetland

**Habitat for Humanity of New Castle County**  
*FY2024 Congressionally Directed Spending Application*  
Newark Affordable Homeownership Project

*Project Description*

Habitat for Humanity of New Castle County seeks to build 14-15 new affordable homeownership opportunities for low-income families located at 2303 Glasgow Avenue in Newark, Delaware. The homes will be constructed with a combination of volunteer sweat equity and sub-contractors. Once complete, the homes will be fully equipped with ENERGY STAR-rated appliances, 2-4 bedrooms, up to 2.5 bathrooms, and on-site parking. The development of the property includes the installation of sewer, water, electricity, curbing and new streets.

While the homes are being constructed, we will identify the homebuyers and prepare them to purchase and maintain the homes. To prepare for successful homeownership, qualified families attend mandatory educational training. The three core classes of our Affordable Homeownership Program are Foundations, which teaches the homebuyers the importance of budgeting, the difference between luxuries and necessities, and how to maintain good credit; Cornerstone, which prepares the homebuyers to work on the construction site and maintain their homes; and Koinonia, which empowers the homebuyers with civic leadership.

*Target Population*

At Habitat for Humanity of New Castle County (HFHNCC), we serve low-income families earning 35%-80% of the Area Median Income (AMI). Often the families we serve are living in overcrowded, substandard housing and are spending more than half of their income on housing costs alone, rendering them severely cost-burdened. Severely cost-burdened households have limited or no remaining assets for necessities, such as healthcare, nutritious food, reliable transportation, or education.

*Building Methods*

HFHNCC utilizes conventional stick framed houses on a poured concrete crawl space foundation. Stick framing includes all parts of the framed building structure, from roofs to trusses to walls, and are traditionally constructed on site. These homes will be two story attached townhomes, with brick facades to comply with its location in a historic district (Aiken's Tavern). HFHNCC acts as the general contractor both in the site development and the construction of the homes. HFHNCC utilizes standard townhome models as specified below:

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**Habitat for Humanity of New Castle County**  
*FY2024 Congressionally Directed Spending Application*  
Newark Affordable Homeownership Project

*Project Timeline*

Working with an engineer, HFHNCC anticipates the review, subdivision and variance process to take 12 – 16 months through New Castle County Land Use’s process. We would begin construction after receiving all approvals and building permits.

*Project Outcomes*

At HFHNCC, we measure success by the success of the families in our programs. On a biennial basis, we survey partner families to measure the impact of its programs. The most recent survey captures both qualitative and quantitative data, revealing the impact of our Affordable Homeownership Program:

- 84% of homeowners and their families have been positively impacted by our Affordable Homeownership Program,
- 79% have been able to create and maintain positive relationships with neighbors,
- 77% of families surveyed were able to decrease their financial assistance from the government,
- 75% reported that they have been able to manage their finances better after attending our financial literacy courses,
- 60% reported their children's grades have improved by 1-3 grade letters,
- and 60% have been able to increase their income.



Initial Review: \_\_\_\_\_  
Updated On: \_\_\_\_\_  
Complete: \_\_\_\_\_  
Official Use Only

## Coastal Zone Management Act Federal Consistency Form

This document provides the Delaware Coastal Management Program (DCMP) with a Federal Consistency Determination or Certification for activities regulated under the Coastal Zone Management Act of 1972, as amended, and NOAA's Federal Consistency Regulations, 15 C.F.R. Part 930. Federal agencies and other applicants for federal consistency are not required to use this form; it is provided to applicants to facilitate the submission of a Consistency Determination or Consistency Certification. In addition, federal agencies and applicants are only required to provide the information required by NOAA's Federal Consistency Regulations.

|                               |                                |
|-------------------------------|--------------------------------|
| <b>Project/Activity Name:</b> | New Castle Presbytery (HFHNCC) |
|-------------------------------|--------------------------------|

**I. Federal Agency or Non-Federal Applicant Contact Information:**

Contact Name/Title: Hannah Wertz

Federal Agency Contractor Name (if applicable): \_\_\_\_\_

Federal Agency: U.S. Department of Housing and Urban Development  
(either the federal agency proposing an action or the federal agency issuing a federal license/permit or financial assistance to a non-federal applicant)

Mailing Address: 919 W. 34th Street, #4706

City: Baltimore State: MD Zip Code: 21211

E-mail: wertz@az-ri.com Telephone #: 717-668-1680

**II. Federal Consistency Category:**

- Federal Activity or Development Project (15 C.F.R. Part 930, Subpart C)
- Outer Continental Shelf Activity (15 C.F.R. Part 930, Subpart E)
- Federal Financial Assistance (15 C.F.R. Part 930, Subpart F)
- Federal License or Permit Activity (15 C.F.R. Part 930, Subpart D)
- Federal License or Permit Activity which occurs wholly in another state (interstate consistency activities identified in DCMP's Policy document)

**III. Detailed Project Description** (attach additional sheets if necessary):

Habitat for Humanity of New Castle County (HFHNCC) is proposing to build 14-15 new affordable homeownership opportunities for low-income families earning 35%-80% of the Area Median Income (AMI). The proposed project will include construction of approximately fourteen to fifteen two-story attached townhomes located at 2303 Glasgow Avenue, Newark, Delaware 19702.

**IV. General Analysis of Coastal Effects** (attach additional sheets if necessary):

AZ-RI has reviewed the above-reference project and has determined it to be consistent with the Delaware Coastal Management Program. This determination is based upon the following findings: the project is located in an existing neighborhood in the City of Newark, DE and will connect to municipal sewer and water.

**V. Detailed Analysis of Consistency with DCMP Enforceable Policies** (attach additional sheets if necessary):

**Policy 5.1: Wetlands Management**

No wetlands are present on the Subject Property.

**Policy 5.2: Beach Management**

The proposed homes are not located on or in proximity of a public or private beach.

**Policy 5.3: Coastal Waters Management** (includes wells, water supply, and stormwater management. Attach additional sheets if necessary)

The proposed homes will connect to municipal water and sewer. HFHNCC will comply with all state codes related to coastal water management.

**Policy 5.4: Subaqueous Land and Coastal Strip Management**

N/A. The project does not include and is not located on an industrial site.

**Policy 5.5: Public Lands Management**

N/A. The project does not include construction on public lands.

**Policy 5.6: Natural Lands Management**

N/A. The Subject Property will not be acquired for nature preserves.

**Policy 5.7: Flood Hazard Areas Management**

The project is not located in a 100-year flood plain.

**Policy 5.8: Port of Wilmington**

The project is located in Newark, DE.

**Policy 5.9: Woodlands and Agricultural Lands Management**

The subject property is located on land already committed to urban development due to the parcel's location within the U.S. Census-designated urban area.

**Policy 5.10: Historic and Cultural Areas Management**

HFHNCC will work with Delaware SHPO to obtain final approval and mitigate any adverse impacts, if applicable, that may occur as part of this project prior to beginning any construction. HFHNCC is in the initial stages of this consultation.

**Policy 5.11: Living Resources**

The USFWS, Endangered and Threatened Species branch as well as DNREC Species Conservation and Research Program is being consulted with. The project will not threaten existing habitat of native species. HFHNCC will obtain final approval and mitigate any adverse impacts, if applicable, that may occur as part of this project prior to beginning any construction.

**Policy 5.12 Mineral Resources Management**

N/A.



**Policy 5.13: State Owned Coastal Recreation and Conservation**

The project is not located in areas contiguous to state owned lands whose natural condition or present state of use would maintain or enhance the conservation of natural, cultural, or historic resources for recreational use.

**Policy 5.14: Public Trust Doctrine**

N/A.

**Policy 5.15: Energy Facilities**

N/A.

**Policy 5.16: Public Investment**

The project is located in an existing neighborhood in the City of Newark, Delaware and will connect to municipal sewer and water.

**Policy 5.17: Recreation and Tourism**

N/A.

**Policy 5.18: National Defense and Aerospace Facilities**

N/A.

**Policy 5.19: Transportation Facilities**

N/A.

**Policy 5.20: Air Quality Management**

Any emissions from the project is expected to be de minimis.

**Policy 5.21: Water Supply Management**

The new home will connect to municipal water.

**Policy 5.22: Waste Disposal Management**

The new home will connect to municipal sewer.

**Policy 5.23: Development**

The project is located in the Newark, DE in an existing neighborhood.

**Policy 5.24: Pollution Prevention**

HFHNCC, to the best of its ability, acts in a manner that minimizes any present or future threats to human health or the environment through responsible waste disposal.

**Policy 5.25: Coastal Management Coordination**

N/A.

**VI. JPP and RAS Review** (Check all that apply):

Has the project been reviewed in a monthly Joint Permit Processing and/or Regulatory Advisory Service meeting?

JPP

RAS

None

\*If yes, provide the date of the meeting(s): \_\_\_\_\_

**VII. Statement of Certification/Determination and Signature** (Check one and sign below):


**FEDERAL AGENCY CONSISTENCY DETERMINATION.** Based upon the information, data, and analysis included herein, the federal agency, or its contracted agent, listed in (I) above, finds that this proposed activity is consistent to the maximum extent practicable with the enforceable policies of the Delaware Coastal Management Program.

OR

**FEDERAL AGENCY NEGATIVE DETERMINATION.** Based upon the information, data, and analysis included herein, the federal agency, or its contracted agent, listed in (I) above, finds that this proposed activity will not have any reasonably foreseeable effects on Delaware's coastal uses or resources (Negative Determination) and is therefore consistent with the enforceable policies of the Delaware Coastal Management Program.

OR

**NON-FEDERAL APPLICANT'S CONSISTENCY CERTIFICATION.** Based upon the information, data, and analysis included herein, the non-federal applicant for a federal license or permit, or state or local government agency applying for federal funding, listed in (I) above, finds that this proposed activity complies with the enforceable policies of the Delaware Coastal Management Program and will be conducted in a manner consistent with such program.

|               |   |                |
|---------------|---|----------------|
| Signature:    |  |                |
| Printed Name: | Hannah Wertz  | Date: 03/22/24 |

Pursuant to 15 C.F.R. Part 930, the Delaware Coastal Management Program must provide its concurrence with or objection to this consistency determination or consistency certification in accordance with the deadlines listed below. Concurrence will be presumed if the state's response is not received within the allowable timeframe.

**Federal Consistency Review Deadlines:**

|   |   |
|---|---|
| Federal Activity or Development Project<br>(15 C.F.R. Part 930, Subpart C)                    | 60 days with option to extend an additional 15 days or stay review (15 C.F.R. § 930.41)   |
| Federal License or Permit<br>(15 C.F.R. Part 930, Subpart D)                                  | Six months, with a status letter at three months. The six month review period can be stayed by mutual agreement. (15 C.F.R. § 930.63)   |
| Outer Continental Shelf Activity<br>(15 C.F.R. Part 930, Subpart E)                           | Six months, with a status letter at three months. If three month status letter not issued, then concurrence presumed. The six month review period can be stayed by mutual agreement. (15 C.F.R. § 930.78) |
| Federal Financial Assistance to State or Local Governments<br>(15 C.F.R. Part 930, Subpart F) | State Clearinghouse schedule  |

**OFFICIAL USE ONLY:**

|  |  |                |
|--|--|----------------|
| Reviewed By:   | Fed Con ID:  | Date Received: |
| Public notice dates: _____ to _____  | Comments Received: <input type="checkbox"/> NO <input checked="" type="checkbox"/> YES<br><i>[attach comments]</i> |                |
| Decision type:<br><small>(objections or conditions attach details)</small> | Decision Date: _____   |                |