



STATE OF DELAWARE
EXECUTIVE DEPARTMENT
OFFICE OF
STATE PLANNING COORDINATION

November 16, 2004

Mr. Ron Sutton
McCrone, Inc.
111 South West Street, Ste. 6
Dover, DE 19904

RE: PLUS review – PLUS 2007-10-06; Virdin Property

Dear Mr. Sutton:

Thank you for meeting with State agency planners on October 27, 2004 to discuss the proposed plans for the Virdin property located on Brenford Road near Smyrna.

According to the information received, you are seeking site plan approval through Kent County for 213 residential units on 106.09 acres.

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.

This office has received the following comments from State agencies:

Office of State Planning Coordination – Contact: David Edgell 302-739-3090

This project is located in Investment Level 3 according State Strategies for Policies and Spending. This site is also located in the Kent County Growth Zone. Investment Level 3 reflects areas where growth is anticipated by local, county, and state plans in the longer term future, or areas that may have environmental or other constraints to development. State investments will support growth in these areas, but please be advised that the State may have other priorities in the near term future. Our office has no objections to the proposed development of this project in accordance with the County codes and ordinances.

Our office is aware that the Smyrna School District is in the process of locating a site for a new school and that they have met with the developer on at least one occasion. We would like to indicate the willingness to work with the District, the County, and the developer in the event that this site appears to be a feasible and desirable location for a new school.

State Historic Preservation Office (SHPO) – Contact: Anne McCleave 739-5685

At one time there may have been an old farmhouse and other agricultural buildings on this site. Now it appears that only a shed exists and the house has been replaced with a trailer. There is a high probability for prehistoric and historic archaeological sites within the subject property, especially near the buildings and in the forested areas and near the stream. It is recommended that the development stay out of the forested areas and provide a buffer between the development and the forested area to minimize harm to the sites. If there are any federal permits, licenses or fund involved with the project, the federal agency must comply with Section 106 of the National Historic Preservation Act (36 CFR 800).

Department of Transportation – Contact: Bill Brockenbrough 760-2109

- 1) A traffic impact study (TIS) was scoped for this project on June 9, 2004. At that time, the projected size of the development was 275 houses. With the drop in size to 213 houses, a TIS is no longer required, and DelDOT informed the developer of this fact by letter on October 8, 2004. The specific warrant that is no longer met is the Average Daily Traffic warrant of 2,100 or more trips per day. DelDOT calculated that a 213-house development would generate 2,085 vehicle trips per day. DelDOT notes that on question 36 of the PLUS form, there is an estimate of 2,143 trips per day. They would like to know how that figure was calculated. If it is based on some special characteristic of this development, then a TIS may be warranted. If it is correct, then a TIS will be required.
- 2) The response to Question 33 on the PLUS form indicates that the developer does not anticipate funding any infrastructure improvements. They should now anticipate doing so. The response to Question 37 on the PLUS form describes Brenford Road as having 12-foot lanes and no shoulders. While the width may vary, the lane width on Brenford Road is more commonly 10 feet. DelDOT's standard typical section for local roads, such as Brenford Road, is 11-foot lanes with 5-foot shoulders. Presently, most of the land on Brenford Road between Massey's Millpond Road (Kent Road 148) and US Route 13 is being developed and DelDOT is requiring the developers to improve the road. Some of the developers are working together to have a portion of the road improved as a single project. The developer of this project will be required to either participate in that project or to make separate improvements of equal or greater value than a proportional share of those costs. More information on the project just mentioned

and the alternative to participating in it may be obtained from our Subdivision Engineer, Mr. Drew Boyce. He may be reached at (302) 760-2165.

- 3) Two access points are proposed, one opposite a planned entrance to the Heritage Trace subdivision and one east of there. While DelDOT normally prefers that entrances be located opposite each other, the Heritage Trace entrance is on the outside of a curve. Consequently, while sight distance is adequate for the Heritage Trace development, it may not be adequate for the Viridin Property at the same place. Sight distance analyses will be required as part of the entrance plan approval process. If the analyses determine that the sight distance is inadequate, then the southwest entrance may not be permitted.
- 4) Brenford Road is classified as a local road and has an existing right-of-way width of 50 feet. DelDOT's policy is to require dedication of sufficient land to provide a minimum right-of-way width of 30 feet from the centerline on local roads. Therefore we will require right-of-way dedication to provide the additional 5 feet from this project.
- 5) DelDOT will also require that a paved multi-modal path, located in a 15-foot wide permanent easement, be provided across the frontage of the site.
- 6) DelDOT supports the comment from Mr. Robert Ehemann of the Department of Natural Resources and Environmental Control regarding the connection to the Village of Eastridge. The proposed connector street to the Village of Eastridge is a good thing and they commend the developer for proposing it. Its location will have to be coordinated with that development. The developer of the Village of Eastridge, Benchmark Builders, has indicated their willingness to provide such a connection, so the coordination should be straightforward.
- 7) There are two parcels that separate this project from the Norfolk Southern railroad tracks. DelDOT's initial recommendation was that stub streets be provided to those parcels, even though those stub streets would have required permits for wetland crossings, because the only other access to them is across the railroad tracks. State law prohibits the creation of new public at-grade railroad crossings. While new private at-grade railroad crossings are still permissible, they are inherently dangerous and DelDOT discourages their use where possible. At the PLUS meeting, the developer indicated that the owners of those parcels have recently obtained other access, parallel to the tracks. If that is so, then the stub streets are not necessary.
- 8) There is an outparcel, a residential lot measuring about 2.3 acres, that fronts on Brenford Road and is surrounded by the proposed development on two sides and the Village of Eastridge on a third side. DelDOT's initial recommendation was that the plan should include a street or driveway connection to that property so that if it is subdivided or redeveloped it can be served through the Viridin Property

rather than directly from Brenford Road. At the PLUS meeting, Ms. Jean Fabi of the Kent County Department of Planning Services indicated that the outparcel will be part of the Village of Eastridge. If that is the case, DelDOT withdraws this comment.

- 9) DelDOT recommends changing the site design to eliminate the two proposed cul-de-sacs, if possible, in order to maintain the grid street pattern.
- 10) The developer's engineer should contact the DelDOT project manager for Kent County, Mr. Brad Herb of Johnson, Mirmiran & Thompson, regarding their requirements for streets and access. Mr. Herb may be reached at (302) 266-9080.

**The Department of Natural Resources and Environmental Control – Contact:
Kevin Coyle 739-3091**

Soils

According to the Kent County soil survey, the following soils were found in the immediate vicinity of the proposed construction and grouped on the basis of drainage class:

- Well drained – Sassafras & Matapeake
- Moderately well drained – Mattapex & Woodstown
- Poorly drained (**hydric**) – Fallsington & Othello
- Very poorly drained (**hydric**) – Johnston (floodplain)

According to the Kent County soil survey, Sassafras, Mattapex, Woodstown, Fallsington, Othello, and Johnston were mapped in the immediate vicinity of the proposed construction. Sassafras and Matapeake are well-drained upland soils that have few limitations for development. Mattapex and Woodstown are moderately well-drained soils of low-lying uplands that have moderate limitations for development. Fallsington and Othello are poorly-drained wetland associated (hydric) soils that have severe limitations for development. Johnston is a very poorly-drained (hydric) soil associated with floodplain wetlands.

Wetlands

Statewide Wetland Mapping Project (SWMP) maps indicate the presence of palustrine forested wetlands, palustrine scrub-shrub wetlands and palustrine emergent wetlands

The site sketch provided does not indicate the extent of wetlands on the property; however the PLUS application materials indicate that wetlands have been delineated. This delineation should be verified Corps of Engineers through the Jurisdictional Determination process. The sketch also does not indicate the presence of the unnamed

stream which runs through the property, although the line labeled as the 100-year flood line may have been mislabeled.

Impacts to wetlands should be avoided and vegetated buffers of no less than 100 feet should be employed from all wetlands and waterbodies. Lots should exclude all wetlands and associated buffers. The developer should note that both DNREC and Army Corps of Engineers discourage allowing lot lines to contain wetlands to minimize potential cumulative impacts resulting from unauthorized and/or illegal activities and disturbances that can be caused by homeowners.

Impacts to Palustrine wetlands are regulated by the Army Corps of Engineers through Section 404 of the Clean Water Act. In addition, individual 404 permits and certain Nationwide Permits from the Army Corps of Engineers also require 401 Water Quality Certification from the DNREC Wetland and Subaqueous Land Section and Coastal Zone Federal Consistency Certification from the DNREC Division of Soil and Water Conservation, Delaware Coastal Programs Section. Each of these certifications represents a separate permitting process. Impacts to streams and associated riparian wetlands, including road crossings, are regulated by the DNREC Wetlands and Subaqueous Lands Section, and by the Corps of Engineers.

To find out more about permitting requirements, the applicant is encouraged to attend a Joint Permit Process Meeting. These meetings are held monthly and are attended by federal and state resource agencies responsible for wetland permitting. Contact Denise Rawding at (302) 739-4691 to schedule a meeting.

It should also be noted that this parcel contains sensitive headwater riparian wetlands associated with the two unnamed (or name unknown) tributaries to Garrison's Lake and thence to the Leipsic River. Headwater riparian wetlands and their associated streams are important for the protection of water quality and the maintenance/integrity of the ecological functions throughout the length of the stream, including the floodplain system downstream. Since headwater streams are a major avenue for nutrient-laden stormwater and sediment runoff, their protection deserves the highest priority. **In recognition of this concern, the Department strongly recommends that the applicant preserve, in its entirety, the existing natural forested buffer adjacent said tributaries.**

TMDLs

Although Total Maximum Daily Loads (TMDLs) as a "pollution runoff mitigation strategy" to reduce nutrient loading have not yet been developed for most of the tributaries or subwatersheds of the Delaware Bay watershed to date, work is continuing on their development. TMDLs for the Leipsic River subwatershed, of which this parcel is part, are scheduled for completion in December 2006.

Therefore, until the specified TMDL reductions and pollution control strategies are adopted, it shall be incumbent upon the developer to employ best available technologies

(BATS) and/or best management practices (BMPs) as “methodological mitigative strategies” to reduce degradative impacts associated with development.

Water Supply

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 typically take approximately four weeks to process, which allows the necessary time for technical review and advertising.

Should you have any questions concerning these comments, please contact Rick Rios at 302-739-3665.

Stormwater Management

1. Land disturbing activities in excess of 5,000 square feet are regulated under the Delaware Sediment and Stormwater Regulations. A detailed sediment and stormwater management plan must be reviewed and approved by the Kent Conservation District prior to any land disturbing activity (i.e. clearing, grubbing, filling, grading, etc.) taking place. The review fee and a completed Application for a Detailed Plan are due at the time of plan submittal to the Kent Conservation District. Construction inspection fees based on developed area and stormwater facility maintenance inspection fees based on the number of stormwater facilities are due prior to the start of construction. Please refer to the fee schedule for those amounts.
2. The following notes must appear on the record plan:
 - The Kent Conservation District reserves the right to enter private property for purposes of periodic site inspection.
 - The Kent Conservation District reserves the right to add, modify, or delete any erosion or sediment control measure, as it deems necessary.
 - A clear statement of defined maintenance responsibility for stormwater management facilities must be provided on the Record Plan.
3. Ease of maintenance must be considered as a site design component and a maintenance set aside area for disposal of sediments removed from the basins during the course of regular maintenance must be shown on the Record Plan for the subdivision.

4. Access to the proposed stormwater facility must be provided for periodic maintenance. This access should be at least 12 feet wide to leading to the facility and around the facility's perimeter.
5. All drainage ways and storm drains should be contained within drainage easements and clearly shown on the plan to be recorded by Kent County.
6. A soils investigation supporting the stormwater management facility design is required to determine impacts of the seasonal high groundwater level and soils for any basin design.

Comments:

1. Portions of this site contain Othello soils based on the Soil Survey for Kent County prepared by the USDA Soil Conservation Service. The Othello soil series consists of poorly drained, slowly permeable silty soil. Othello soils have severe limitations for most community development and recreational uses such as: basements, roads, and lawns.
2. From the USGS Topography Map, it appears that steep erodable slopes are present around the perimeter of the site bordering the Leipsic River. Care should be taken to avoid disturbance in these areas.
3. The preferred methods of stormwater management are those practices that maximize the use of the natural features of a site, promote recharge and minimize the reliance on structural components. The designer is encouraged to consider the conservation design approach and limit the amount of tree clearing required for the development of the site including the stormwater management facilities shown in the wooded areas.
4. It is recommended that the stormwater management areas be incorporated into the overall landscape plan to enhance water quality and to make the stormwater facility an attractive community amenity.
5. A letter of no objection to recordation will be provided once the detailed Sediment and Stormwater Management plan has been approved.
6. Proper drainage of developed lots and active open space should be considered in the development of the grading plan for this subdivision.
7. Based on the site characteristics, a pre-application meeting is suggested to discuss stormwater management and drainage for this site.

Drainage

The Drainage Section recommends that the existing ditches and streams on this property be evaluated for function and, if needed, cleaned with minimal impact to the wetlands prior to selling of lots. The Drainage Section requests that any area designated as a drainage/utility easement be open space and not owned by the individual landowners. Structures, decks, buildings, sheds, kennels, fences, or trees should not be placed within the drainage easement to allow for maintenance. The Drainage Section further requests that all precautions be taken to ensure the project does not hinder any off site drainage upstream of the project or create any off site drainage problems downstream by the release of on site storm water.

Dredge Materials

The Division of Soil and Water is currently negotiating with the Handler Corporation to utilize 25 acres of the Viridin property for dredged material disposal purposes in association with the Garrisons Lake dredging project. The area that they are looking to utilize is the southeastern corner of the property.

Floodplain

Kent County's Subdivision regulations prohibit the subdividing of land within the floodplain. This project appears to encroach within the floodplain. FEMA requires a detailed flood study to be performed by the applicant if the development proposal is greater than 5 acres or 50 lots, and the floodplain has not been studied in detail by FEMA.

Forests

The forest on this parcel connects two State Fish and Wildlife areas: Massey's Millpond and Garrisons Lake. The forest provides important riparian habitat, and wildlife connectors and water quality benefits. This forest tract is extremely beneficial to the region. It connects both Massey's Millpond and Garrisons Lake to adjoining water bodies such as Leipsic River. Fragmentation of this forest can have irreversible effects to the regional ecosystem. Therefore, the developer is strongly encouraged to preserve, and where possible, enhance forested resources on site. This includes removing lot lines and infrastructure (such as storm water management ponds) from forested areas to the extent possible and minimizing any clearing activities. The forested areas on-site should be viewed as a community asset and managed appropriately.

A storm water management pond is proposed in the forested tract located at the southern portion of the parcel. This SWM pond should be removed from the forest to a more appropriate area in the parcel.

Forested areas on-site set aside for conservation purposes should be placed into a permanent conservation easement or other binding protection. These areas should be clearly marked and delineated so that residents understand their importance and so that homeowner activities do not infringe upon these areas.

Open Space

To maximize the existing buffering capacity and wildlife habitat on site, it is recommended that lot lines and other infrastructure (such as storm water management ponds) be pulled out of the forest and that areas of community open space be designated along the forested/riparian areas. Doing so will accomplish two things: it will preserve and expand the existing riparian buffers on site and its value for birds and wildlife and it will create recreational opportunities for residents by allowing them access to and views of the forest and stream.

In areas set aside for passive open space, the developer is encouraged to consider establishment of additional forested areas or meadow-type grasses. Once established, these ecosystems provide increased water infiltration into groundwater, decreased run-off into surface water, air quality improvements, and require much less maintenance than traditional turf grass, an important consideration if a homeowners association will take over responsibility for maintenance of community open spaces.

Open space containing forest and/or wetlands should be placed into a permanent conservation easement or other permanent protection mechanism. Conservation areas should also be demarked to avoid infringement by homeowners.

Rare/Threatened/Endangered Species

There is an active Bald Eagle nest site located adjacent to the project area. Bald eagle nesting areas retain protection under the federal Endangered Species Act. All habitat within 750 feet of the nest is protected; in general, no activity is permitted within this zone at any time of the year. Any work proposed within a secondary protection zone, defined as the area between 750 feet and 1,320 feet from the nest, will be under time-of-year restriction; in general, no activity is permitted within this zone from 15 December to 1 July.

A portion of the project area is within the 1,320 ft protection zone. There is also another development (Villages of Eastridge) proposed for an adjacent parcel within the 1,320 ft protection zone. Because the Bald Eagle is a federally listed species, you or your client will need to contact the U.S. Fish and Wildlife Service (USFWS), as any decisions on federally listed species are ultimately their jurisdiction. Please contact Craig Koppie, USFWS Endangered Species Biologist, at (410) 573-4534. The DNREC program Zoologist, Kitt Heckscher, should be included in correspondence regarding this issue.

Revegetation/Landscaping

It is requested that no invasive species be used in the revegetation of disturbed or landscaped areas. A list of species considered invasive in Delaware can be found on the DNHP web site, www.dnrec.state.de.us/fw/invasive.htm. You are further encouraged to use native plants, where possible/feasible, for habitat restoration projects on-site, and DNREC Botanist, Bill McAvoy can be contacted at (302) 653-2880 to assist you in developing a plant list.

Recreation

It is recommended that sidewalks be built fronting every residence and stub streets. A complete system of sidewalks will: 1) fulfill the recreation need for walking and biking facilities 2) provide opportunities for neighbors to interact in the community and 3) facilitate safe, convenient off-road access to neighboring communities, public mass transit stops, schools, stores, work, etc.

The Division of Parks and Recreation conducted a telephone survey of Delaware residents to gather information on outdoor recreation patterns and preferences as well as other information on their landscape perception. These findings are the foundation of the 2003-2008 Statewide Comprehensive Outdoor Recreation Plan (SCORP) providing guidance for investments in needed outdoor recreation facilities. The high and moderate facility needs in Kent County are listed below. Consideration should be given to incorporate some of these recreation opportunities into the project. For additional information about the outdoor recreation priorities, contact Bob Ehemann at 739-5285.

High priorities are Walking or Jogging Paths, Bike Paths, Swimming Pools, Picnic Areas, Playgrounds and Fishing Areas. Moderate priorities are Skate Facilities, Hiking Trails, Baseball/Softball Fields, Campgrounds, Soccer Fields, Volleyball Courts, Basketball Courts and Canoe/Kayak Access.

Air Quality

Air pollution threatens the health of human beings and other living things on our planet. While often invisible, pollutants in the air create smog and acid rain, cause cancer or other serious health effects, diminish the protective ozone layer in the upper atmosphere, and contribute to the potential for world climate change. Breathing polluted air can have numerous effects on human health, including respiratory problems, hospitalization for heart or lung disease, and even premature death. Some can also have effects on aquatic life, vegetation, and animals.

Once complete, vehicle emissions associated with this project are estimated to be 16.3 tons (32,693.3 pounds) per year of VOC (volatile organic compounds), 13.5 tons (27,067.8 pounds) per year of NO_x (nitrogen oxides), 10.0 tons (19,971.1 pounds) per year of SO₂ (sulfur dioxide), 0.9 ton (1,777.8 pounds) per year of fine particulates and 1,367.4 tons (2,734,751.0 pounds) per year of CO₂ (carbon dioxide).

Emissions from electrical power generation associated with this project are estimated to be 2.6 tons (5,226.3 pounds) per year of NOx (nitrogen oxides), 9.1 tons (18,178.3 pounds) per year of SO2 (sulfur dioxide) and 1,340.6 tons (2,681,295.1 pounds) per year of CO2 (carbon dioxide).

Emissions from area sources associated with this project will be 6.6 tons (13,186.7 pounds) per year of VOC (volatile organic compounds), 0.7 ton (1,450.9 pounds) per year of NOx (nitrogen oxides), 0.6 ton (1,204.1 pounds) per year of SO2 (sulfur dioxide), 0.8 ton (1,553.8 pounds) per year of fine particulates and 26.7 tons (53,455.9 pounds) per year of CO2 (carbon dioxide).

	VOC	NOx	SO ₂	PM _{2.5}	CO ₂
Mobile	16.3	13.5	10.0	0.9	1367.4
Residential	6.6	0.7	0.6	0.8	26.7
Electrical Power		2.6	9.1		1340.6
TOTAL	22.9	16.8	19.7	1.7	2734.7

The Department of Natural Resources and Environmental Control is asking that local jurisdictions consider mitigation to help resolve this issue. Mitigation might involve limiting large new developments to growth zones, focusing development to urban areas capable of providing mass transit services, requiring more energy efficient homes which would lessen air quality impacts, and promoting walkability and bikability within and between developments and town centers.

State Fire Marshal’s Office – Contact: John Rossiter 739-4394

These comments are intended for informational use only and do not constitute any type of approval from the Delaware State Fire Marshal’s Office. 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):

- a. **Fire Protection Water Requirements:**
 - Where a water distribution system is proposed for single family dwellings it shall be capable of delivering at least 500 gpm for 1-hour duration, at 20-psi residual pressure. Fire hydrants with 1000 feet spacing on centers are required.
 - The infrastructure for fire protection water shall be provided, including the size of water mains.

- b. **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. This means that the access road to the subdivision from Brenford Road must be constructed so fire department apparatus may negotiate it.
- 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.
- Any dead end road more than 300 feet in length shall be provided with a turn-around or cul-de-sac arranged such that fire apparatus will be able to turn around by making not more than one backing maneuver. The minimum paved radius of the cul-de-sac shall be 38 feet. The dimensions of the cul-de-sac or turn-around shall be shown on the final plans. Also, please be advised that parking is prohibited in the cul-de-sac or turn around.
- If the use of speed bumps or other methods of traffic speed reduction must be in accordance with Department of Transportation requirements.

c. **Gas Piping and System Information:**

- Provide type of fuel proposed, and show locations of bulk containers on plan.

d. **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”
- Name of Water Supplier
- Proposed Use
- National Fire Protection Association (NFPA) Construction Type
- Maximum Height of Buildings (including number of stories)
- Provide Road Names, even for County Roads

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.delawarestatefiremarshal.com, technical services link, plan review, applications or brochures.

Department of Agriculture - Contact: Mark Davis 739-4811

The Viridin Property is currently subject to an agricultural district agreement which expires 9/27/06. The Department has received notification from the landowner that they intend NOT to renew the agreement. The development plans for this property cannot be finalized until the district agreement expires.

The Delaware Forest Service recommends the following:

- Preservation of trees during the construction process.

- Use of a Diverse Landscape Plan the use the “right tree for the right place” concept which encourages native trees and shrubs when possible.
- The use of forest buffers for adjacent subdivisions and agricultural sites.

Public Service Commission - Contact: Andrea Maucher 739-4247

The project information sheets state water will be provided to the project by Tidewater Utilities via a central water system. The PSC has verified that the project is located within the public water service area granted to Tidewater Utilities under Certificate of Public Convenience and Necessity PSC-1164.

Any expansion of natural gas or installation of a closed propane system must fall within Pipeline Safety guidelines. Contact: Malak Michael at (302) 739-4247.

Delaware Emergency Management Agency – Contact: Don Knox 659-3362

Due to the large number of residential units being proposed, a significant impact to public safety is foreseen by implementation of this project. The developer should notify the police, fire service, and emergency medical response organization serving this portion of Kent County, to keep them apprised of all development activities.

Department of Education – Contact: Nick Vacirca 739-4658

213 dwelling units could generate an estimated 107 additional students for the Smyrna School District. While Kent County does not have school concurrence at this time, it is recommended that you submit a package to the school district for informational purposes. It is imperative that projects in the Smyrna area are sent to the Smyrna School District for informational purposes due to the growth that is occurring in the area. This will allow the School District to accomplish strategic planning.

If the development is approved and build, please use the following information for school transportation planning. If there are homes more than ½ mile form the nearest public road (outside the development), you should plan wide enough streets so that large school busses can access and turn around(without backing) from the furthest areas within the development while picking up and dropping off students. Should there not be any sites more than ½ mile from the nearest public road, provisions for appropriate pick-up and drop-off at the development entrance should be included.

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 pre-application process, noting whether comments were incorporated into the project design or not and the reason therefore.

PLUS 2004-10-06 – Virdin Property

November 16, 2004

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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

CC: Kent County
Town of Smyrna