



STATE OF DELAWARE  
EXECUTIVE DEPARTMENT  
OFFICE OF  
STATE PLANNING COORDINATION

March 16, 2005

Mr. Mark H. Davidson  
Design Consultants Group, Inc.  
18072 Davidson Drive  
Milton, DE 19968

RE: PLUS review – PLUS 2005-01-12; Lake at Carriage Springs

Dear Mr. Davidson;

Thank you for meeting with State agency planners on February 23, 2005 to discuss the proposed plans for the Lake at Carriage Springs project to be located north of Route 252 near Route 30.

According to the information received, you are seeking a rezoning from AR-1 to AR-1 cluster through Sussex County for 155 residential units on 77.55 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 Sussex 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.

**Executive Summary**

The following section includes some site specific highlights from the agency comments found in this letter. This summary is provided for your convenience and reference. The full text of this letter represents the official state response to this project. ***Our office notes that the applicants are responsible for reading and responding to this letter and all comments contained within it in their entirety.***

### **State Strategies/Project Location**

- This proposal is located within an Investment Level 4 area according to the Strategies for State Policies and Spending and a Low Density area according to the Sussex County Comprehensive Plan. In these areas, State policies encourage preservation of agricultural and natural resources and not development. Because of its location within an Investment Level 4 area, we object to the proposal and notes that the State will not participate in any infrastructure upgrades or other improvements necessary to support this development.

### **Street Design and Transportation**

- The developer should expect to be required to improve Huff Road to DelDOT's local road standards from Sand Hill Road to Delaware Route 30.
- Huff Road is classified as a local road. Local roads in rural Delaware typically have right-of-way widths ranging from 33 to 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.
- 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.
- Stub streets should be provided for future connections to parcels to the east, north and west.
- At the meeting, the developer indicated that the ponds would discharge to the Huff Road right-of-way. At the meeting, Ms. Jessica Watson of the Sussex Conservation District indicated, a letter indicating DelDOT concurrence with that discharge would be required. DelDOT does not anticipate issuing that letter. The drainage should be managed on the site.

### **Natural and Cultural Resources**

- The developer is strongly encouraged to relocate all lots from the forested area and preserve the forest as community open space by permanent conservation easement.
- The following 72 lots should be removed from the forest:

23-45	55-74	110-118
122-130	134-140	151-155

- It is recommended that at least a 100-foot buffer of trees be left intact around wetlands located on the northern portion of the parcel. This buffer should not contain lot lines as subsequent landowner activities
- The applicant indicated that wildlife habitat would be set aside in an open space area (Open Space 1 on site plan) of approximately 17 acres. However, it was indicated that this area would also serve as a site for wastewater irrigation. This type of land use is not compatible with wildlife, especially considering the need to periodically harvest the vegetation.
- It is recommended that sidewalks be built fronting every residence and stub streets.

The following are a complete list of comments received by State agencies:

**Office of State Planning Coordination – Contact: Ann Marie Townshend 739-3090**

This proposal is located within an Investment Level 4 area according to the Strategies for State Policies and Spending and a Low Density area according to the Sussex County Comprehensive Plan. In these areas, State policies encourage preservation of agricultural and natural resources and not development. Because of its location within an Investment Level 4 area, we object to the proposal and notes that the State will not participate in any infrastructure upgrades or other improvements necessary to support this development.

As proposed, the site plan shows little valuable open space beyond what is required for wastewater disposal and stormwater management. While we appreciate the greenway incorporated along the perimeter of the development, the overall fragmentation and loss of forest shown in the proposal is of concern to State. We recommend that the proposal be redesigned to preserve more forested area on the site.

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

There are no known historic properties within this parcel, and the probability for archeological sites on any period is low. The surrounding inventoried historic properties are shielded from this parcel by the extensive woods. This project will not affect any historic properties.

**Department of Transportation – Contact: Bill Brockenbrough 760-2109**

Because the development is proposed for a Level 4 Area, it is inconsistent with the Strategies for State Policies and Spending. Therefore DelDOT will not participate in the cost of any road improvements needed to support this development. The comments that follow are technical, and are not intended to suggest that DelDOT supports this development proposal.

- 1) The developer should expect to be required to improve Huff Road to DelDOT's local road standards from Sand Hill Road to Delaware Route 30. If, as indicated in the answer to Item 37 on the PLUS form, the road has 10-foot lanes and grass shoulders, the improvement would consist of widening the lanes to a width of 11 feet, widening the shoulders to as much as 5 feet (right-of-way permitting), paving the shoulders and overlaying the road. At the PLUS meeting, other developments along Huff Road were mentioned. In all likelihood, responsibility for improving Huff Road will be shared with those other developments.
- 2) Huff Road is classified as a local road. Local roads in rural Delaware typically have right-of-way widths ranging from 33 to 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 they will require right-of-way dedication to provide any additional width needed from this project.
- 3) 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.
- 4) The plan provided with the PLUS form showed a divided entrance street that narrows to an undivided street as it approaches the first internal intersection. Because there is only one access to the development, DelDOT recommends that median and the extra width be extended to that intersection. This concern had been addressed on the plan presented at the PLUS meeting.
- 5) DelDOT recommends that the County require that stub streets be provided for future connections to the north, east and west.
- 6) At the meeting, the developer indicated that the ponds would discharge to the Huff Road right-of-way. At the meeting, Ms. Jessica Watson of the Sussex Conservation District indicated, a letter indicating DelDOT concurrence with that discharge would be required. DelDOT does not anticipate issuing that letter. The drainage should be managed on the site.
- 7) The developer's site engineer should contact the DelDOT Subdivision Manager for Sussex County, Mr. John Fiori, regarding our requirements for access and the road improvements mentioned in Comment 2 above. Mr. Fiori may be reached at (302) 760-2260.

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

**Design Recommendation**

The developer should provide consideration for habitat conservation or preservation. The developer is strongly encouraged to relocate all lots from the forested area and preserve the forest as community open space by permanent conservation easement.

The following 72 lots should be removed from the forest:

23-45	55-74	110-118
122-130	134-140	151-155

**Soils**

According to the Soils Survey update, Downer, Ingleside, & Woodstown were mapped in the immediate vicinity of the proposed construction. Downer and Ingleside are well-drained upland soils that have few limitations for development. Woodstown is a moderately well-drained soil of low-lying uplands that has moderate limitations for development.

Although most of the soils on this parcel are fairly well drained, they have some limitations associated with rapidly permeable sandy subsurface horizons. Such soils are conducive to nutrient leaching via groundwater or surface runoff into the surrounding watershed. In soils containing shallow water tables or found in close proximity to waterbodies, these impacts are greatly intensified.

**Wetlands**

Site plans show no impact to the existing wetlands. Wetlands should be preserved as part of open space and be placed into a conservation easement. It is recommended that at least a 100-foot buffer of trees be left intact around wetlands located on the northern portion of the parcel. This buffer should not contain lot lines as subsequent landowner activities (clearing, construction, lawn fertilizer application) could reduce the width and function of the buffer. Stormwater management ponds should also not be constructed within this buffer zone.

**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 Broadkill 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.

### **Sediment and Erosion Control/Stormwater Management**

1. Please submit a sediment control and stormwater management plan to the Sussex Conservation District for review. No construction (i.e. clearing, filling, grading, etc.) shall take place on-site until a sediment control and stormwater management plan has been approved by the Conservation District.
2. Please indicate on the sediment and stormwater management plan who shall be responsible for maintenance of the stormwater management facilities both during construction and after.
3. During the design of the sediment control and stormwater management plan, considerations should be made for maintenance (i.e. access, easements, etc.) of any structures or facilities.
4. During the design of the stormwater management facility please note that both stormwater quantity and quality must be addressed.
5. If a stormwater management pond is going to be utilized as a sediment trap/basin during construction it must be designed to accommodate 3600 cubic feet of storage per acre of contributing drainage area until project stabilization is complete.
6. Specify F.F. elevations for all lots.

7. All ponds are required to be constructed per pond code 378.
8. Please note that if the stormwater facilities will impact wetlands, a permit must be provided to the District prior to receiving approval.
9. Due to the proximity to sensitive areas, the Conservation District will require reinforced and super silt fence to adequately protect wetland areas during the construction of the site
10. A CCR is required for this development since the gross acreage for the project exceeds 50 acres.

### **Forests**

Developments that are designed within wooded areas significantly reduce the value of the forest in terms of wildlife due to clearing, fragmentation, and subsequent landowner activities. Not only is this forest part of a larger forest block, but over 50% of the forest on this parcel is to be removed. The site plan should be redesigned to allow for greater forest preservation. This would entail removing some of the lot lines out of the wooded area and leaving a larger continuous area of forest as 'open space'. It was indicated at the meeting that a 15-foot wooded buffer/greenway would be set aside around the perimeter of the project parcel. Building would not be permitted in this area. However, there are plans to include a 6-foot wide walking path, which only allows approximately 9 feet of preserved forest. In terms of wildlife habitat and forest preservation, it is better to leave a larger continuous area of trees than a narrow buffer strip or small disconnected area of forest. Forest fragmentation separates wildlife populations, increases road mortality, and increases "edge effects" that leave many forest dwelling species vulnerable to predation and allows the infiltration of invasive species.

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**

The applicant indicated that wildlife habitat would be set aside in an open space area (Open Space 1 on site plan) of approximately 17 acres. However, it was indicated that this area would also serve as a site for wastewater irrigation. This type of land use is not compatible with wildlife, especially considering the need to periodically harvest the vegetation. If this area is to be used by wildlife it will need to be planted with a variety of plants that do not require maintenance and can be utilized by ground nesting birds and foraging wildlife species. If the applicant is interested in creating wildlife habitat on this portion of the parcel, our program botanist Bill McAvoy can assist in developing a plant

list. Please note that another area designated as open space 2 on the plan is actually an area planned for a clubhouse and may not be appropriate for open space calculations.

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 preserve and expand the existing buffers on site and its value for birds and wildlife and it will create recreational opportunities for residents.

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.

### **Potential Hunting Issue**

Because the project parcel is part of a larger forest block, legal hunting activities may take place on adjacent properties. Hunting within 100 yards of a dwelling is illegal and the applicant may want to contact adjacent landowners to determine if this is going to be an issue. In effect, the adjacent landowner will be losing 100 yards of their property for hunting if there is no buffer between lot lines and the adjacent property line.

### **Nuisance Waterfowl**

The applicant indicated that they may use monofilament line to discourage geese. Research has shown this method to be effective at deterring geese if used properly; however, there are issues with other wildlife species becoming entangled in the monofilament line. In addition, monofilament could pose a safety hazard to residents and make it difficult for emergency personnel to rescue individuals who have accidentally fallen into the pond.

Instead of monofilament line, a 50-foot buffer of native vegetation, including tall grasses, wildflowers, shrubs, and trees should be planted around the pond. Ponds with this type of buffer are not as attractive to geese because they do not feel safe from predators and other disturbance when their view of the area is blocked. The Division of Fish and Wildlife does not provide goose control services, and if problems arise, residents or the homeowners association will have to accept the burden of dealing with these species (e.g., permit applications, costs, securing services of certified wildlife professionals). Solutions can be costly and labor intensive; however, with a reduction in the number of ponds, proper landscaping, monitoring, and other techniques, geese problems can be minimized.

### **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, parks, public mass transit stops, schools, stores, work, etc. We recommend a pedestrian/bike access to the Cottage of Neptune to the north as well as connections to the west and east for future non-motorized mobility.

DNREC appreciates the greenway trail proposed for the perimeter of the project. They recommend that connections to adjacent properties be included in a network of pathways. For trail design/construction specifications, contact Susan Moerschel at (302) 739-5285.

**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 11.9 tons (23,790.9 pounds) per year of VOC (volatile organic compounds), 9.8 tons (19,697.2 pounds) per year of NOx (nitrogen oxides), 7.3 tons (14,533.0 pounds) per year of SO2 (sulfur dioxide), 0.6 ton (1,293.7 pounds) per year of fine particulates and 995.0 tons (1,990,077.0 pounds) per year of CO2 (carbon dioxide).

Emissions from area sources associated with this project are estimated to be 4.8 tons (9,595.9 pounds) per year of VOC (volatile organic compounds), 0.5 ton (1,055.8 pounds) per year of NOx (nitrogen oxides), 0.4 ton (876.2 pounds) per year of SO2 (sulfur dioxide), 0.6 ton (1,130.7 pounds) per year of fine particulates and 19.4 tons (38,899.8 pounds) per year of CO2 (carbon dioxide).

Emissions from electrical power generation associated with this project will be 1.9 tons (3,803.1 pounds) per year of NOx (nitrogen oxides), 6.6 tons (13,228.3 pounds) per year of SO2 (sulfur dioxide) and 975.6 tons (1,951,177.2 pounds) per year of CO2 (carbon dioxide).

	VOC	NOx	SO <sub>2</sub>	PM <sub>2.5</sub>	CO <sub>2</sub>
Mobile	11.9	9.8	7.3	0.6	995.0
Residential	4.8	0.5	0.4	0.6	19.4
Electrical Power		1.9	6.6		975.6
TOTAL	16.7	12.2	14.3	1.2	1990.0

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.

For this project the electrical usage via electric power plant generation alone totaled to produce an additional **Error! Not a valid link.** tons of nitrogen oxides per year and **Error! Not a valid link.** tons of sulfur dioxide per year.

A significant method to mitigate this impact would be to require the builder to construct Energy Star qualified homes. Every percentage of increased energy efficiency translates into a percent reduction in pollution. Quoting from their webpage <http://www.energystar.gov/>:

“ENERGY STAR qualified homes are independently verified to be at least 30% more energy efficient than homes built to the 1993 national Model Energy Code or 15% more efficient than state energy code, whichever is more rigorous. These savings are based on heating, cooling, and hot water energy use and are typically achieved through a combination of:

- building envelope upgrades,
- high performance windows,
- controlled air infiltration,
- upgraded heating and air conditioning systems,
- tight duct systems and
- upgraded water-heating equipment.”

The energy office in DNREC is in the process of training builders in making their structures more energy efficient. The Energy Star Program is excellent way to save on energy costs and reduce air pollution. The Energy Office highly recommends this project development and other residential proposals increase the energy efficiency of their homes.

**State Fire Marshal’s Office – Contact: Duane Fox 856-5298**

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):

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:**

- 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. (Assembly)
- 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. (One & Two- Family Dwelling)
- Where a water distribution system is proposed for the site, the infrastructure for fire protection water shall be provided, including the size of water mains for fire hydrants and sprinkler systems.

b. **Fire Protection Features:**

- All structures over 10,000 Sq. Ft. aggregate will require automatic sprinkler protection installed.
- Buildings greater than 10,000 sq.ft., 3-stories of more or 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

c. **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 Huff 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.
- 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.
  
- d. **Gas Piping and System Information:**
  - Provide type of fuel proposed, and show locations of bulk containers on plan.
  
- e. **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)
  - Townhouse 2-hr separation wall details shall be shown on site plans
  - 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

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](http://www.delawarestatefiremarshal.com), technical services link, plan review, applications or brochures.

**Department of Agriculture - Contact: Mark Davis 739-4811**

The Delaware Forest Service does not support this project as proposed and reserves the right to comment on this site at this time. The site falls within a high valued area of connectivity for state open space and land preservation activities. This site is located in both a high priority areas for both agricultural and forestland preservation on the state's Green Infrastructure Preservation Map. In addition, the development as proposed, lessens the value of the environmental resources found within and adjacent to this site. The Department strongly encourages the developer to work with all agencies to address such concerns as preservation of forested areas, preservation of agricultural activities and a reduction to the overall impact to areas service such as schools and EMS. The Delaware Department of Agriculture Forest Service offers it services to the developer in the re-design of this project to meet the goals of all parties, to learn more please contact the DDA office at (302) 698-4500.

### *Right Tree for the Right Place*

The Delaware Department of Agriculture Forest Service encourages the developer to use the “Right Tree for the Right Place” for any design considerations. This concept allows for the proper placement of trees to increase property values in upwards of 25% of appraised value and will reduce heating and cooling costs on average by 20 to 35 dollars per month. In addition, a landscape design that encompasses this approach will avoid future maintenance cost to the property owner and ensure a lasting forest resource.

### *Native Landscapes*

The Department of Agriculture encourages the developer to use native trees and shrubs to buffer the property from the adjacent land-use activities near this site. A properly designed forested buffer can create wildlife habitat corridors and improve air quality to the area by removing six to eight tons of carbon dioxide annually and clean our rivers and creeks of storm-water run-off pollutants. To learn more about acceptable native trees and how to avoid plants considered invasive to our local landscapes, please contact the Delaware Department of Agriculture Plant Industry Section at (302) 698-4500.

### *Berm Design and Construction*

The Delaware Department of Agriculture Forest Service encourages the developer to design a landscape feature above the current county code that reflects the local topography and utilizes native trees and shrubs. A well designed berm can create an attractive feature that is welcoming to the community and will be beneficial to both desired economic and environmental issues.

### *Open Space Considerations*

The Delaware Department of Agriculture and the Delaware Forest Service supports comments made by DNREC to allow for improved design to open space and provide areas of connectivity to both passive and open space areas within the planned community.

### *Forest Buffers*

This site does have elements of riparian corridors and forest buffers along the northern and eastern edges of the property. The Delaware Department of Agriculture and the Delaware Forest Service encourages the developer to implement tree preservation practices and supports the Sussex Conservation District in their efforts to preserve trees on this site. Both agencies agree that trees should not be removed for construction of storm water management facilities. The Forest Service encourages the developer to seek the assistance of a certified arborist or certified forest to aid in this design process.

**Public Service Commission - Contact: Andrea Maucher 739-4247**

PSC records indicate that Tidewater Utilities does not currently hold a CPCN to provide water to these areas. They will need to file an application for a CPCN with the Public Service Commission, if they have not already done so.

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 State Housing Authority – Contact Karen Horton 739-4263**

According to the State Strategies Map, the proposal is located in Investment Level 4 and outside the growth zone. As a general practice, DSHA encourages residential development in areas where residents will have proximity to services, markets, and employment opportunities such as Investment Level 1 and 2 areas outlined in the State Strategies Map. The proposal is located in an area targeted for agricultural activities and natural resource protection, and therefore inconsistent with where the State would like to see new residential development.

**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 organizations serving this portion of Sussex County, to keep them apprised of all development activities.

Routes 9 and 113 are coastal storm evacuation routes and this development will be affected by traffic volume on these routes during a coastal storm event.

**Sussex County – Contact: Richard Kautz 855-7878**

The site looks like it also includes parcel 38.03 and the County application should be revised accordingly.

The developer should provide the stub road access to adjacent property as requested by DelDOT.

Because this project is an AR-1 Cluster subdivision, the developer must include in the application a plan for the management of all open space. Also, the developer must document for the Planning and Zoning Commission how the proposed development: provides for a total environment and design which are superior to that which would be allowed under the standard lot option; preserves the natural environment and historic or archeological resources; and, will not have an adverse effect on any of the items included under Ordinance Number 1152 (County Code 99-9C). These issues can be addressed by including in the application an explanation of how the developer plans to mitigate the issues raised by the State agencies.

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This summer Sussex County will be considering implementation of a Source Water Protection Program required by the State. Depending on the requirements adopted by the County Council this project might be affected. Any well location should insure that the wellhead protection area is entirely on site.

The Sussex County Engineer Comments:

The project proposes to develop using a private central community wastewater system. They recommend that the wastewater system be operated under a long-term contract with a capable wastewater utility. The proposed project is located outside of the Inland Bays Planning Area where Sussex County expects to provide sewer service. Sussex County requires design and construction of the collection and transmission system to meet Sussex County sewer standards and specifications. A review and approval of the treatment and disposal system by the Sussex County Engineering Department is also required. Disposal fields should not be counted as open space. Wastewater disposal fields should be clearly identified on the Record Plan

If Sussex County ever provides sewer service, it is required that the treatment system be abandoned and a direct connection made to the County system at the developers and/or homeowners association expense.

For questions regarding these comments, contact Rob Davis, Sussex County Engineering Department at (302) 855-7820.

**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.**

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

Sincerely,



Constance C. Holland, AICP  
Director

CC: Sussex County  
Carriage Springs Run, LLC