



STATE OF DELAWARE
EXECUTIVE DEPARTMENT
OFFICE OF MANAGEMENT AND BUDGET
STATE PLANNING COORDINATION

July 18, 2007

Buck Payne
Blades Development, LLC
800 Industrial St., Ste. F
Wilmington, DE 19801

RE: PLUS review – PLUS 2007-06-01; Blades Development

Dear Mr. Payne:

Thank you for meeting with State agency planners on June 27, 2007 to discuss the proposed plans for the Blades Development project to be located on River Road and South Market Street in Blades.

According to the information received, you are seeking site plan approval through the Town of Blades for 40 single family homes and 24 apartments on 6 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 the Town of Blades is the governing authority over this land, the developers will need to comply with any and all regulations/restrictions set forth by the Town.

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

- The OSPC has no objection to the proposed project as it is in with a Level One Investment Area according to the *Strategies for State Policies and Spending* document and is in accordance with the Certified Comprehensive Plan for the Town of Blades. In addition, this office commends the developer for his efforts to redevelop a former industrial site into a mixed housing type community. This office would encourage the developer to continue to work closely with DNREC to address and meet any brownfield redevelopment requirements and impervious surface concerns. If you have any questions, please contact my office.

Street Design and Transportation

- South Market Street is classified as a collector road and River Road is classified as a local road. DelDOT's policy is to require dedication of sufficient land to provide a minimum right-of-way width of 40 feet from the centerline on collector roads and 30 feet from the centerline on local roads. The developer has asked DelDOT to reduce this requirement on River Road and they are considering that request.
- Both the preliminary site plan and the conceptual site plan show a proposed street accessing River Road. This will require DelDOT review and approval. DelDOT also expects to require geometric improvements at the intersection of Market Street and River Road.
- Bicycle and pedestrian facilities will be required along the site frontage on both South Market Street and River Road. Mr. Fiori will determine the specific type of improvements, as part of the entrance plan review. DelDOT expects to require a multi-use path on Market Street and a sidewalk on River Road.
- As indicated on the plans, the property abuts a railroad right-of-way. DelDOT recommends that fencing and a landscape buffer be provided along the railroad right-of-way to help keep children and pets off the tracks.
- The design on the parking lot for the apartments may be a problem. If it has not been done, DelDOT recommends that a turning template be applied to the plan to make sure that all of the proposed parking spaces are accessible.

Natural and Cultural Resources

- The Water Supply Section recommends a water balance study.
- The Water Supply Section also recommends reducing the impervious cover by developing additional open space.

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

Office of State Planning Coordination – Contact: Bryan Hall 739-3090

The OSPC has no objection to the proposed project as it is in with a Level One Investment Area according to the *Strategies for State Policies and Spending* document and is in accordance with the Certified Comprehensive Plan for the Town of Blades. In addition, this office commends the developer for his efforts to redevelop a former industrial site into a mixed housing type community. This office would encourage the developer to continue to work closely with DNREC to address and meet any brownfield redevelopment requirements and impervious surface concerns. If you have any questions, please contact my office.

Division of Historical and Cultural Affairs – Contact: Alice Guerrant 739-5685

This parcel/property is within the Blades Historic District, which is National Register-eligible Blades Historic District, but is not listed as a National Register site. While this area has good potential for prehistoric-period and historic-period archaeological sites, the previous industrial development and clean-up has most likely disturbed most of the area. The project could have an adverse effect on the district, although the neo-traditional layout and scale of the houses proposed may fit well with the historic district. In addition, there is also a possibility that there could be prehistoric-period or historic-period archaeological sites still existing on this parcel, or within the area of where this parcel is located.

If this development is approved or proceeds, the Division of Historical & Cultural Affairs-State Historic Preservation Office would like the opportunity to examine the area prior to any ground-disturbing activities, to see if there are in fact any archaeological sites on the parcel and to learn something about their location, nature, and extent.

If you would like to discuss this information or other issues further, contact the Division of Historical & Cultural Affairs at (302) 744-7400 ext.25. *(Robin Bodo, the National Register Coordinator and architectural historian would be happy to discuss any questions the developer may have about minimizing any adverse effect on the district through the project's design. You can contact Robin Bodo at 302-736-7400 ext.18).*

Department of Transportation – Contact: Bill Brockenbrough 760-2109

- 1) South Market Street is classified as a collector road and River Road is classified as a local road. DelDOT's policy is to require dedication of sufficient land to provide a minimum right-of-way width of 40 feet from the centerline on collector roads and 30 feet from the centerline on local roads. The developer has asked DelDOT to reduce this requirement on River Road and they are considering that request.
- 2) Both the preliminary site plan and the conceptual site plan show a proposed street accessing River Road. This will require DelDOT review and approval. DelDOT also expects to require geometric improvements at the intersection of Market Street and River Road. The developer's site engineer should contact the Subdivision Manager for Sussex County, Mr. John Fiori, regarding specific requirements for access and off-site improvements. Mr. Fiori may be reached at (302) 760-2260.
- 3) Bicycle and pedestrian facilities will be required along the site frontage on both South Market Street and River Road. Mr. Fiori will determine the specific type of improvements, as part of the entrance plan review. DelDOT expects to require a multi-use path on Market Street and a sidewalk on River Road.
- 4) As indicated on the plans, the property abuts a railroad right-of-way. DelDOT recommends that fencing and a landscape buffer be provided along the railroad right-of-way to help keep children and pets off the tracks.
- 5) The design on the parking lot for the apartments may be a problem. If it has not been done, DelDOT recommends that a turning template be applied to the plan to make sure that all of the proposed parking spaces are accessible.

**The Department of Natural Resources and Environmental Control – Contact:
Kevin Coyle 739-9071**

Soils

According to the Sussex County soil survey, Henlopen-Rosedale complex was mapped in the immediate vicinity of the proposed construction. Henlopen-Rosedale is a well to excessively well-drained soil likely to have some limitations on account of its rapid permeability.

Impervious Cover

Based on information provided by the applicant in the PLUS application, post-development surface imperviousness for this project was estimated by the applicant to reach 50 percent. However, given the scope and density of this project this projection may be an underestimate.

The applicant should realize that all forms of constructed surface imperviousness (i.e., rooftops, sidewalks, stormwater management structures, and roads) should be included in the calculation for surface imperviousness; it was unclear from the submittal whether constructed surface imperviousness was comprehensively considered. Nonetheless, it is strongly recommended that the applicant include all of aforementioned forms of surface imperviousness in their finalized calculation for surface imperviousness. This will ensure a realistic assessment of this project's likely post-construction environmental impacts.

Studies have shown a strong relationship between increases in impervious cover to decreases in a watershed's overall water quality. It is strongly recommended that the applicant implement best management practices (BMPs) that reduce or mitigate some of its most likely adverse impacts. Reducing the amount of surface imperviousness through the use of pervious paving materials ("pervious pavers") in lieu of asphalt or concrete in conjunction with an increase in forest cover preservation or additional tree plantings are some examples of practical BMPs that could easily be implemented to help reduce surface imperviousness.

ERES Waters

This project is located adjacent to receiving waters of the greater Nanticoke watershed, and designated as having waters of Exceptional Recreational or Ecological Significance (ERES). ERES waters are recognized as special assets of the State, and shall be protected and/ or restored, to the maximum extent practicable, to their natural condition.

Provisions in Section 5.6 of Delaware's "Surface Water Quality Standards" (as amended July 11, 2004), specify that all designated ERES waters and receiving tributaries develop a "pollution control strategy" to reduce non-point sources of pollutants through implementation of Best Management Practices (BMPs). Moreover, provisions defined in subsection 5.6.3.5 of same section, specially authorize the Department to mandate BMPs to meet standards for controlling the addition of pollutants and reducing them to the greatest degree achievable and, where practicable, implementation of a standard requiring no discharge of pollutants.

TMDLs

Total Maximum Daily Loads (TMDLs) for nitrogen and phosphorus have been promulgated through regulation for the Nanticoke watershed. A TMDL is the maximum level of pollution allowed for a given pollutant below which a "water quality limited water body" can assimilate and still meet water quality standards to the extent necessary to support use goals such as, swimming, fishing, drinking water and shell fish harvesting. Although TMDLs are required by federal law, states are charged with developing and implementing standards to support these desired use goals. In the greater Nanticoke watershed, "target-rate-nutrient reductions" of 30 and 50 percent will be required for nitrogen and phosphorus, respectively. Additionally, "target-rate-reductions" of 2 percent will be required for bacteria.

TMDL Compliance through the PCS

As indicated above, Total Maximum Daily loads (TMDLs) for nitrogen and phosphorus have been proposed for the Nanticoke watershed. The TMDL calls for a 30 and 50 percent reduction in nitrogen and phosphorus from baseline conditions. The TMDL also calls for a 2 percent reduction in bacteria. A pollution control strategy (PCS) will be used as a regulatory framework to ensure that these nutrient reduction targets are attained. The Department has developed an assessment tool to evaluate how your proposed development may reduce nutrients to meet the TMDL requirements. Additional nutrient reductions may be possible through the implementation of Best Management Practices such as wider vegetated buffers along watercourses, increasing passive, wooded open space, and the use of green-technology stormwater management treatment trains. Contact Lyle Jones at 302-739-9939 for more information on the assessment tool.

Water Resource Protection Areas

The Water Supply Section has determined that the proposed development falls entirely within a wellhead protection area for the Town of Blades. Wellhead protection areas are surface and subsurface areas surrounding a public water supply well where land use

activities or impervious cover may adversely affect the quantity and quality of ground water moving toward such wells. The review did not find any excellent groundwater recharge areas (see following map and attached map).

The Water Supply Section recommends that the portion of the new development within the wellhead protection area not exceed 20% impervious cover. Some allowance for augmenting ground-water recharge should be considered if the impervious cover exceeds 20% but is less than 50% of that portion of the parcel within this area. However, the development should not exceed 50% regardless. The purpose of an impervious cover threshold is to minimize loss of recharge (and associated increases in storm water) and protect the quality and quantity of ground water and surface water supplies.

The proposed development would change the impervious over from approximately 20% to approximately 50%. The PLUS applicant provided these percentages. WSS finds this to be an underestimation of impervious cover.

A water balance calculation will be necessary to determine the quantity of clean water to be recharged via a recharge basin (Thorntwaite, 1957). The environmental assessment must document that post-development recharge will be no less than predevelopment recharge when computed on an annual basis. Commonly, the applicant offsets the loss of recharge due to impervious cover by constructing recharge basins that convey relatively pure rooftop runoff for infiltration to ground water.

- The Water Supply Section recommends a water balance study.
- The Water Supply Section also recommends reducing the impervious cover by developing additional open space.

The proposed plan discusses swales, infiltration, and the possible expansion of the existing stormwater management facility to manage storm water within the wellhead area. Care should be taken in the design and management of these systems because they are in the capture zone of the Town of Blades' drinking water supply. All the water entering these systems in the form of precipitation and runoff can/will be drawn into public water supply.

- The ideal solution is to divert all stormwater flow away from and out of the wellhead protection area.
- If the ideal solution is not possible, WSS recommends a stormwater management system that pre-treats the water before infiltration. This pre-treatment system must be maintained to the highest standards to assure the

References

Delaware Department of Natural Resources and Environmental Control, 2005, Source Water Protection Guidance Manual for the Local Governments of Delaware, p. 144.

http://www.wr.udel.edu/publications/SWAPP/swapp_manual_final/swapp_guidance_manual_final.pdf

Delaware Code Annotated (2001). Title 7, Chapter 60, Subchapter VI, § 6083 (2006). Adoption of source water assessment, wellhead protection and excellent ground-water recharge potential areas by the Governor's Cabinet Committee on State Planning Issues. [Electronic version]. Retrieved November 8, 2006, from

<http://www.delcode.state.de.us/title7/c060/sc06/index.htm#TopOfPage>

Kauffman, G.J., Wozniak, S.L., and Vonck, K.J., 2005, Delaware Ground-Water Recharge Design Manual: Newark, DE, Water Resources Agency, University of Delaware, p. 31.

Listed as: "Supplement 1 – Groundwater Recharge Design Methodology"

<http://www.wr.udel.edu/swaphome/Publications/SWPguidancemanual.html>

Climatic Water Budget

Thornthwaite, C. W. and Mather, J. R., 1957, Instructions and Tables for Computing Potential Evapotranspiration and the Water Balance: Drexel Institute of Technology, Laboratory of Climatology, Volume x, Number 3

Water Supply

The project information sheets state water will be provided to the project by the Town of Blades via a public water system. DNREC records indicate that the project is located within the public water service area granted to the Town of Blades under Certificate of Public Convenience and Necessity 92-CPCN-05.

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.

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 Peninsula Plating located within 1000 feet of the proposed project.

Should you have any questions concerning these comments, please contact Rick Rios at 302-739-9944.

Sediment and Erosion Control/Stormwater Management

Contact the Sussex Conservation District at (302) 856-7219 to schedule a pre-application meeting to discuss stormwater management plans and erosion and sediment control plans as soon as possible. Use of green technology practices and low impact development practices are recommended where feasible.

Drainage

1. The Drainage Program requests that the engineer take precautions 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. The Drainage Program requests that the engineer check existing downstream ditches and pipes for function and blockages prior to the construction. Notify downstream landowners of the change in volume of water released on them.
2. Have all drainage easements recorded on deeds and place restrictions on obstructions within the easements to ensure access for periodic maintenance or future re-construction. Future property owners may not be aware of a drainage easement on their property if the easement is only on the record plan. However, by recording the drainage easement on the deed, the second owner, and any subsequent owner of the property, will be fully aware of the drainage easement on their property.

For questions or clarifications, please contact Jim Sullivan at (302) 739-9921.

Hazardous Waste

Within the vicinity of the property there are 3 large quantity (over 1,000 kg per month) hazardous waste generators: Invista Seaford, Green Tree Tech Aero Division, and

Procino Plating. There are also several small quantity (between 100 and 1,000 kg per month) and conditionally exempt small quantity (under 100 kg per month) hazardous waste generators consisting primarily of auto body shops and dry cleaners. All of these facilities are inspected by the Solid and Hazardous Waste Management Branch to ensure proper management of hazardous waste. Should poor practices or a release be detected, remedial measures would be taken.

This development is located approximately 2 miles by road from the Invista Seaford Nylon Plant. This facility is going through the RCRA Corrective Action Program for investigation and remediation of potential contamination. The investigation of the facility found low level contamination of groundwater on-site. The corrective measures have been selected and are being implemented.

Part of this property operated was an un-registered hazardous waste generator, known as Peninsula Plating. As the Department was not notified of their hazardous waste activities, the Solid and Hazardous Waste Management Branch did not inspect their waste management practices. Following abandonment of the facility the Site Investigation and Remediation Branch performed a remediation on the site.

Solid Waste

This Development is located approximately 2 miles by road from the Invista Seaford Nylon Plant. This plant operates an industrial waste landfill for the placement of ash generated on-site. No waste from off-site is disposed of at this facility. For questions pertaining to the DNREC solid waste permit, please call Avery Dalton of the Solid and Hazardous Waste Management Branch at (302)739-9403.

Underground Storage Tanks

There are three inactive LUST site(s) located near the proposed project:

Continental Bakery, Facility # 5-000075, Project # S9212275
Anchor Enterprise, Facility # 5-000398, Project # S9005022
Blades Pumping Station 45, Facility # 5-000428, Project # S9211262

No environmental impact is expected from the above inactive/active LUST site(s). However, should any underground storage tank or petroleum contaminated soil be discovered during construction, the Tank Management Branch must be notified as soon as possible. It is not anticipated that any construction specifications would need to be changed due to petroleum contamination. However, should any unanticipated

contamination be encountered and PVC pipe is being utilized, it will need to be changed to ductile steel with nitrile rubber gaskets in the contaminated areas.

Air Quality

Once complete, vehicle emissions associated with this project are estimated to be 3.9 tons (7,828.0 pounds) per year of VOC (volatile organic compounds), 3.2 tons (6,481.0 pounds) per year of NO_x (nitrogen oxides), 2.4 tons (4,781.8 pounds) per year of SO₂ (sulfur dioxide), 0.2 ton (425.7 pounds) per year of fine particulates and 327.4 tons (654,799.5 pounds) per year of CO₂ (carbon dioxide).

Emissions from area sources associated with this project are estimated to be 1.6 tons (3,157.4 pounds) per year of VOC (volatile organic compounds), 0.2 ton (347.4 pounds) per year of NO_x (nitrogen oxides), 0.1 ton (288.3 pounds) per year of SO₂ (sulfur dioxide), 0.2 ton (372.0 pounds) per year of fine particulates and 6.4 tons (12,799.3 pounds) per year of CO₂ (carbon dioxide).

Emissions from electrical power generation associated with this project are estimated to be 0.6 tons (1,251.4 pounds) per year of NO_x (nitrogen oxides), 2.2 tons (4,352.5 pounds) per year of SO₂ (sulfur dioxide) and 321.0 tons (642,000.2 pounds) per year of CO₂ (carbon dioxide).

	VOC	NO _x	SO ₂	PM _{2.5}	CO ₂
Mobile	3.9	3.2	2.4	0.2	327.4
Residential	1.6	0.2	0.1	0.2	6.4
Electrical Power		0.6	2.2		321.0
TOTAL	5.5	4.0	4.7	0.4	654.8

For this project the electrical usage via electric power plant generation alone totaled to produce an additional 0.6 tons of nitrogen oxides per year and 2.2 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. They highly recommend this project development and other residential proposals increase the energy efficiency of their homes.

They also recommend that the home builders offer geothermal and photo voltaic energy options. Applicable vehicles should use retrofitted diesel engines during construction.

The development should provide tie-ins to the nearest bike paths, links to mass transit, and fund a lawnmower exchange program for their new occupants.

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):

- 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.
 - Where a water distribution system is proposed for multi-family sites, 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 or more, over 35 feet, or classified as High Hazard, are required to meet fire lane marking requirements.
- Show Fire Department Connection location (Must be within 300 feet of fire hydrant), and detail as shown in the DSFPR.
- Show Fire Lanes and Sign Detail as shown in Delaware State Fire Prevention Regulations
- For townhouse buildings, or Triplexes, or similar building designs by any other name, provide a section / detail and the UL design number of the 2-hour fire rated separation wall on the Site plan.

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 to the subdivision from Fourth St. and from River Rd. 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 any gates that limit fire department access into 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)
- 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, technical services link, plan review, applications or brochures.

Department of Agriculture - Contact: Scott Blaier 698-4500

The Delaware Department of Agriculture has no objections to the proposed development. The project is located within the Town of Blades, and the *Strategies for State Policies and Spending* encourage environmentally responsible development in Investment Level 1 areas.

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 Delaware Department of Agriculture and the Delaware Forest Service 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 will 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.

Public Service Commission - Contact: Andrea Maucher 739-4247

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 Vicki Walsh 739-4263

This proposal is for a site plan review of a mixed-use development consisting of duplex, triplex, single family homes, and 2 apartment buildings located on River Road and South Market Street in Blades. According to the State Strategies Map, the proposal is located in an Investment Level 1 area.

As a general planning 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. Furthermore, DSHA encourages residential development in Level 1 and 2 areas that are affordable to first time homebuyers.

DSHA supports the fact that this proposal targets the full range of incomes including first time homebuyers. For informational purposes, the most recent real estate data collected by DSHA shows the median home price in Sussex County to be \$260,000. However, families earning respectively 100% of Sussex County's median income only qualify for mortgages of \$174,485, thus creating an affordability gap of \$85,515. The provision of units within reach of families earning at least 100% of Sussex County's median income would help increase housing opportunities for first time homebuyers. We recommend that some of the units be set-aside at this price level to ensure that working households have access to affordable housing.

Department of Education – Contact: John Marinucci 735-4055

This proposed development is in the Seaford School District. DOE offers the following comments on behalf of the Seaford School District.

1. Using the DOE standard formula, this development will generate an estimated 32 students.
2. DOE records indicate that the Seaford School Districts' *elementary schools are not at or beyond 100% of current capacity* based on September 30, 2006 elementary enrollment.
3. DOE records indicate that the Seaford School Districts' *secondary schools are not at or beyond 100% of current capacity* based on September 30, 2006 secondary enrollment.
4. The developer is strongly encouraged to contact the Seaford School District Administration to discuss the issue of student population growth.
5. DOE requests the developer work with the Seaford School District transportation department to establish developer supplied bus stop shelter ROW and shelter structures, interspersed throughout the development as determined and recommended by the local school district.

Sussex County – Contact Richard Kautz 855-7878

The purchasers of the homes within this development should be advised by the developer about the adjacent Sussex County Heavy Industrial Zoning District for Wyoming Concrete and that there may be associated dust and noise.

The Sussex County Engineer Comments:

The project proposes 65 total residential units. The proposed project is within the Blades Sanitary Sewer District and connection to the sewer system is mandatory.

The project is within planning study and system design assumptions for sewer service. The proposed development will require a developer installed collection system in accordance with Sussex County's standard requirements and procedures. The Sussex County Engineer must approve the connection point. A sewer concept plan must be submitted for review and approval prior to construction plan approval. A checklist for preparing sewer concept plans is attached.

Onetime System Connection Charges will apply. Please contact Ms. Blair Johnson at 302 855-7701 for additional information on charges.

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,

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

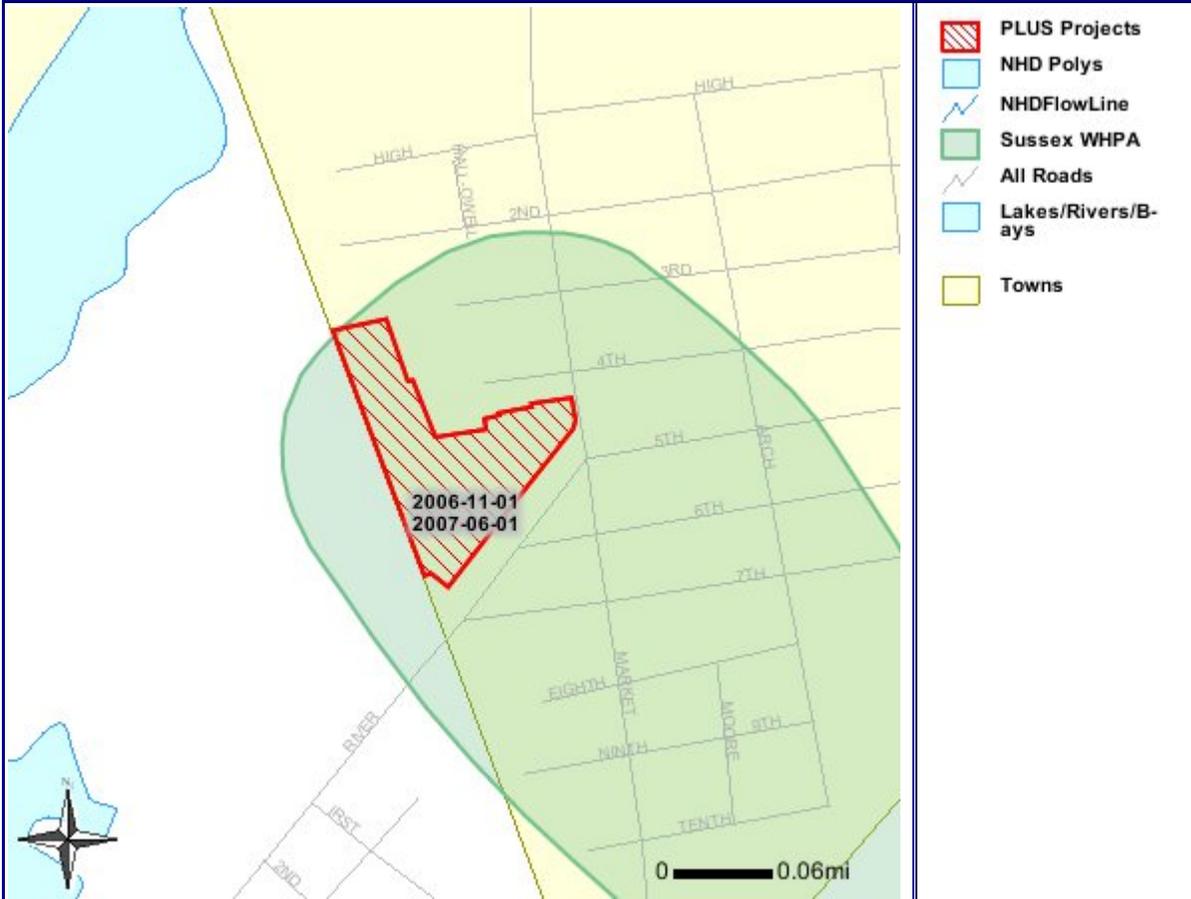
Constance C. Holland, AICP
Director

CC: Town of Blades
Sussex County



Blades Development

2007-06-01



This map was produced by the Delaware Department of Natural Resources and Environmental Control.

