



**STATE OF DELAWARE
EXECUTIVE DEPARTMENT
OFFICE OF STATE PLANNING COORDINATION**

February 19, 2013

Mr. Dev Sitaram
17 Polly Drummond Circle
Newark, DE 19711

RE: PLUS review – 2013-01-01; The Colony at Summit Bridge – East

Dear Mr. Sitaram:

Thank you for meeting with State agency planners on January 23, 2013 to discuss the proposed plans for the Colony at Summit Bridge East project to be located on the east side of Summit Bridge Road, north of the Meadow Glen Subdivision.

According to the information received, you are seeking a rezoning through New Castle County of 45.32 acres from S to ST for a 150 lot subdivision consisting of 39 single family detached homes, 24 twins and 87 townhomes.

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 New Castle County is the governing authority over this land, the developers will need to comply with any and all regulations/restrictions set forth by the County.**

Strategies for State Policies and Spending

- This project is located in Investment Levels 2 and 3 according to the *Strategies for State Policies and Spending*. Investment Level 2 reflects areas where growth is anticipated by local, county, and State plans in the near term future. 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. Our office has no objections to the proposed development of this project in accordance with the relevant County codes and ordinances.

Code Requirements/Agency Permitting Requirements

State Historic Preservation Office – Contact Terrence Burns 736-7404

- There is a 19th-century historic house/agricultural complex, on this parcel, the M. H. House (N-3986). In addition, the Pomeroy and Beers Atlas of 1868 (a 19th-century historic map) does show this house as the M. H. House, and the USGS Topographic Map of 1906 also indicated that house was still there. If there is going to be any development or construction project on this parcel, the developer should be aware of the Delaware Unmarked Human Burials and Human Skeletal Remains Law, which is outlined in Chapter 54 of Title 7 of the Delaware Code.
- Abandoned or unmarked family cemeteries are very common in the State of Delaware. They are usually in rural or open space areas, and sometimes near or within the boundary of an historic farm site. Even a marked cemetery can frequently have unmarked graves or burials outside of the known boundary line or limit. Disturbing unmarked graves or burials triggers the Delaware's Unmarked Human Burials and Human Skeletal Remains Law (Delaware Code Title 7, Chapter 54), and such remains or discoveries can result in substantial delays while the procedures required under this law are carried out. If there is a discovery of any unmarked graves, burials or a cemetery, it is very costly to have them archaeologically excavated and the burials moved. The Division of Historical & Cultural Affairs recommends that owners and/or developers have a qualified archaeological consultant investigate their project area, to the full extent, to see if there is any unmarked cemetery, graves, or burial sites. In the event of such a discovery, the Division of Historical & Cultural Affairs also recommends that the plans be re-drawn to leave the full extent of the cemeteries or any burials on its own parcel or in the open space area of the development, with the responsibility for its maintenance lying with the landowner association or development. If you need or would like to read more information in reference to unmarked human remains, burials or cemeteries, please go to the following websites for additional information:
www.history.delaware.gov/preservation/umhr.shtml and
www.history.delaware.gov/preservation/cemeteries.shtml .
- Prior to any demolition or ground disturbing activities, the developer should consider hiring an archaeological consultant to examine the parcel for potential historic or cultural resources, such as a potential archaeological site, a cemetery or unmarked human remains. In addition, the developer should also include a barrier or sufficient landscaping between the proposed development project and the M. H. House (N-3986), in order to protect it from the various visual or sound effects that may adversely affect it.
- If there is any federal involvement with the project, in the form of licenses, permits, or funds, the federal agency, often through its client, is responsible for complying with Section 106 of the National Historic Preservation Act (36 CFR 800) and must consider their project's effects on any known or potential cultural or historic resources. Owners

and developers who may plan to apply for an Army Corps of Engineers permit or for federal funding, such as HUD or USDA grants, should be aware of the National Historic Preservation Act of 1966 (as amended). Regulations promulgated for Section 106 of this Act stipulate that no ground-disturbing or demolition activities should take place before the Corps or other involved federal agency determines the area of potential effect of the project undertaking. These stipulations are in place to allow for comment from the public, the Delaware State Historic Preservation Office, and the Advisory Council for Historic Preservation about the project's effects on historic properties. Any preconstruction activities without adherence to these stipulations may jeopardize the issuance of a permit or receipt of funding if it is determined that such opportunity to comment has been foreclosed. If you need further information or additional details pertaining to the Section 106 process and the Advisory Council's role, please review the Advisory Council's website at www.achp.gov.

Department of Transportation – Contact Bill Brockenbrough 760-2109

- The site access and streets must be designed in accordance with DelDOT's Standards and Regulations for Subdivision Streets and State Highway Access. This manual is available on-line at http://www.deldot.gov/information/pubs_forms/manuals/subdivisions/pdf/Subdivision_Manual_Revision_1_proposed_060110.pdf.
- DelDOT Development Coordination Section staff met with the applicant and their engineer on October 11, 2012, and discussed the following points:
 - The proposed development meets DelDOT's volume-based warrants for a Traffic Impact Study (TIS) and DelDOT will require one. Subsequently, DelDOT met with the developer and New Castle County officials on January 7, 2013 and established a scope of work for that study.
 - Because the proposed development fronts on a principal arterial highway, a noise analysis will be required, in accordance with Section 3.7 and Appendix L of the Standards and Regulations.
 - A study by DelDOT's Traffic Section has identified an existing need to extend the northbound left turn lane on Route 896 at Porter Road by 200 feet, but there is no current State project to build it. DelDOT will likely require that the developer extend that left turn lane by more than 200 feet to accommodate the traffic generated by the subject development and Colony at Summit Bridge – West, in accordance with Section 3.10.2 of the Standards and Regulations.
- DelDOT anticipates requiring a signal agreement for the development's north entrance, in accordance with Section 3.10.1 of the Standards and Regulations. This entrance would be about 1,870 feet south of the existing traffic signal at Porter Road. At this distance, a signal would likely be feasible. However, to preserve the smooth flow of traffic on Route

896, DeIDOT will consider alternatives, such as prohibiting left turns out of the site, before installing a signal at this location.

Department of Natural Resources and Environmental Control – Contact Bahareh van Boekhold 735-3495

Wetlands

- State regulated wetlands ARE NOT located on this property based on a review of the State wetland maps.
- State regulated subaqueous lands ARE likely to be located on this property based on a review of aerial photographs, State Wetland Mapping Project (SWMP) maps, Soil Surveys and USGS topographic maps. Upon review of the GIS layers, Perennial Rivers/Streams are located on the property.

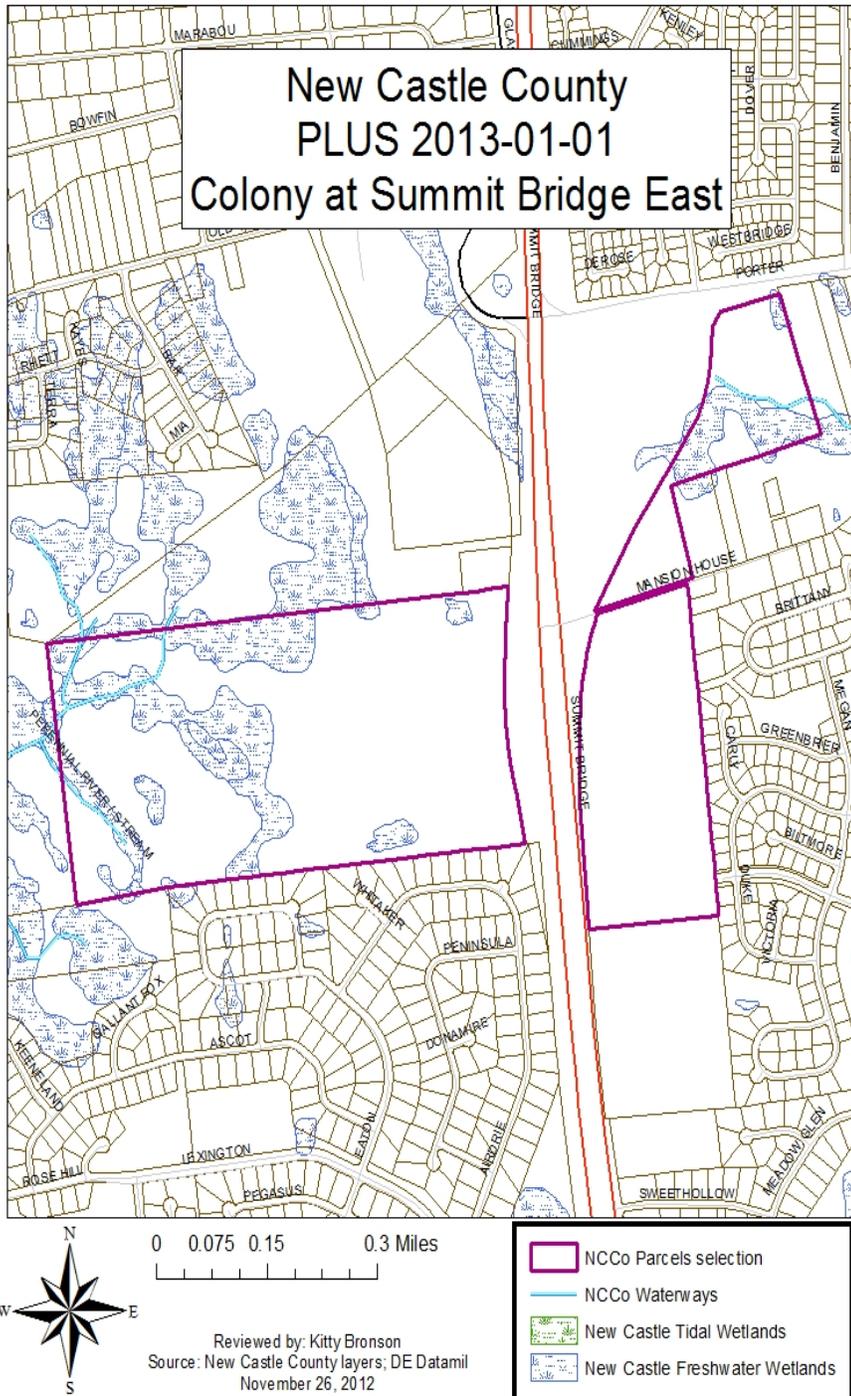
State subaqueous lands include all tidal waters (up to the mean high water line), most non-tidal rivers, streams, lakes, ponds, bays and inlets (up to the ordinary high water line), most perennial streams and ditches and many intermittent streams and ditches. An on-site inspection by a representative of the Wetlands and Subaqueous Lands Section or an environmental consultant is recommended to determine the limits of jurisdictional State subaqueous lands. Additional information about State regulated subaqueous lands is available by contacting the Wetlands and Subaqueous Lands Section at (302) 739-9943 or on line at

<http://www.dnrec.delaware.gov/wr/Services/Pages/WetlandsAndSubaqueousLands.aspx>.

- Waters of the U.S. regulated by the U.S. Army Corps of Engineers ARE likely to be located on this property based on a review of aerial photographs, SWMP maps, Soil Surveys and USGS topographic maps. According to our GIS SWMP maps, there are considerable wetlands regulated by the U.S. Army Corps of Engineers.

Waters of the United States include the following: navigable waters of the United States; wetlands; tributaries to navigable waters of the United States, including adjacent wetlands and lakes and ponds; interstate waters and their tributaries, including adjacent wetlands; and all other waters of the United States not identified above, such as isolated wetlands, intermittent streams, and other waters that are not part of a tributary system to interstate waters or to navigable waters of the United States, where the use, degradation or destruction of these waters could affect interstate or foreign commerce.

- The extent of Federal jurisdiction over Waters of the United States is determined by the U.S. Army Corps of Engineers and is based on site specific conditions. Therefore, an on-site inspection by an environmental consultant is recommended to determine if Waters of the U.S. are located on the property and the limits of Federal jurisdictional. The U.S. Army Corps of Engineers can be contacted at (215) 656-6728 or online at <http://www.nap.usace.army.mil/cenap-op/regulatory/regulatory.htm>.



TMDLs

- Total Maximum Daily Loads (TMDLs) for nitrogen and phosphorus have been promulgated through regulation for the Christina River 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 State water quality standards (e.g., dissolved oxygen, nutrients, and bacteria; *State of Delaware Surface Water Quality Standards, as amended July 11, 2004*) to the extent necessary to support use goals such as, swimming, fishing, drinking water and shell fish harvesting.

TMDLs are required by federal law (Section 303(d) of the 1972 Clean Water Act), and the states are charged with developing and implementing specific land use practices that support these desired use goals. The project is located in the greater Christina River Basin, specifically within the Christina River watershed. In the Christina River watershed, post-development nitrogen and phosphorus loading must be capped at the pre-development or baseline loading rate (or a 0% post-construction increase in Nitrogen & Phosphorous in Delaware’s portion of the Christina River Basin) to meet the required TMDL for each nutrient. Moreover, bacteria must be reduced by 29-95% (depending on location) to meet the required TMDL. The specific required nutrient and bacterial requirements and background information is in the report entitled “*Christina River Basin High-Flow TMDL*” by the EPA. This report can be retrieved from the following web link: http://www.epa.gov/reg3wapd/tmdl/pa_tmdl/ChristinaMeetingTMDL/index.htm

- In response to concerns about the need for reducing nonpoint source nutrient (nitrogen and phosphorus) and bacterial pollutants to levels sufficient to meet the prescribed TMDL reduction requirements in Delaware’s portion of the Christina River Basin, a multifaceted and comprehensive process known as a Pollution Control Strategy (PCS) has been developed to enable such reductions. Specifically, a PCS is a combination of best management practices and control technologies that reduce nutrient and bacterial pollutant runoff loading in waters of a given watershed to level(s) consistent with the TMDL(s) reduction levels specified for that watershed. The PCS for the Christina River watershed consists of 41 recommendations from the following four areas: stormwater, open space, wastewater, and agriculture. Additional information about Christina River PCS is available from the following web link: <http://www.dnrec.delaware.gov/swc/wa/Pages/ChristinaBasin.aspx>
- A nutrient management plan is required under the *Delaware Nutrient Management law* (3 Del. Code, Chapter 22) for all persons or entities who apply nutrients to lands or areas of open space in excess of 10 acres. This project’s open space may exceed this 10-acre threshold. Please contact the Delaware Nutrient Management Program at 739-4811 for further information concerning compliance requirements or view the following web link for additional information: <http://dda.delaware.gov/nutrients/index.shtml>

Water Supply

- The project information sheets state water will be provided to the project by Artesian Water Company via a public water system. Our records indicate that the project is located within the public water service area granted to Artesian Water Company under Certificate of Public Convenience and Necessity 85-WS-03.
- 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.

Water Resource Protection Areas

- The DNREC Ground-Water Protection Branch (GPB) has determined that a portion of the western side of project falls within an area of excellent groundwater recharge potential. In addition, a significant portion of the northern and eastern sides of the project fall within a Level 2 Source Water Protection Area for New Castle County (see map). No wellhead protection areas were identified.

Level 2 Source Water Protection Areas are the delineated watershed upstream from a surface water intake that supplies water to a drinking water system. Land Use or Land Activity within this area has the potential to influence water quality or quantity to the system.

Excellent Ground-Water Recharge Areas are those areas mapped by the Delaware Geological Survey where the first 20 feet of subsurface soils and geologic materials are exceptionally sandy. These soils are able to transmit water very quickly from the land surface to the water table. This map category (excellent) is an indicator of how fast contaminants will move and how much water may become contaminated (Andres, 2004). Land use activities or impervious cover on areas of excellent ground-water recharge potential may adversely affect ground water in these areas.

- DNREC recommends referring to NCC Unified Development Code for regulations regarding development in these areas.

Andres, A. Scott, 2004, Ground-Water Recharge Potential Mapping in Kent and Sussex Counties, Delaware: Delaware Geological Survey Report of Investigations No. 66, p. 14. <http://www.udel.edu/dgs/Publications/pubform.html#investigations>

Sediment and Stormwater Program

- A sediment and stormwater plan will be required for the site. Contact the reviewing agency to schedule a project application meeting to discuss the sediment and erosion control and stormwater management components of the plan as soon as possible. The site topography, soils mapping, pre- and post-development runoff, and proposed method(s) and location(s) of stormwater management should be brought to the meeting for discussion. The plan review and approval as well as construction inspection will be coordinated through the New Castle County Department of Land Use Engineering Section. Contact the Department of Land Use at (302) 395-5470 for details regarding submittal requirements and fees. (Title 7, Delaware Code, Chapter 40 and Delaware Regulations, Title 7, Administrative Code, 5101)

Hazardous Waste Sites

- If it is determined by the Department that there was a release of a hazardous substance on the property in question and the Department requires remediation pursuant to the Hazardous Substance Cleanup Act, the provisions of 7 Del.C., Chapter 91, Delaware Hazardous Substance Cleanup Act and the Delaware Regulations Governing Hazardous Substance Cleanup shall be followed.

Delaware State Fire Marshall's Office – Contact Duane Fox 739-4394

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:

- **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 townhouse type dwelling sites, the infrastructure for fire protection water shall be provided, including the size of water mains.
- **Fire Protection Features:**
 - For townhouse buildings, provide a section / detail and the UL design number of the 2-hour fire rated separation wall on the Site plan

- **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 the main entrance off of Summit Bridge Road must be constructed so fire department apparatus may negotiate it. If a “center island” is placed at an entrance into the subdivision, it shall be arranged in such a manner that it will not adversely affect quick and unimpeded travel of fire apparatus into the subdivision.
 - 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. The display of, and dimensions for cul-de-sac is also applicable to the “round-about(s)” in the center of the subdivision. 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.

- **Gas Piping and System Information:**
 - Provide type of fuel proposed, and show locations of bulk containers on plan.

- **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
 - Square footage of each structure (Total of all Floors)
 - National Fire Protection Association (NFPA) Construction Type
 - Maximum Height of Buildings (including number of stories)
 - Name of Water Provider
 - Letter from Water Provider approving the system layout
 - Townhouse 2-hr separation wall details shall be shown on site plans
 - Provide Road Names, even for County Roads

Delaware Department of Education – Contact Despina Wilson 735-4199

- This development will be subject to the New Castle Voluntary School Assessment Statutes 9 Del. C. Chapter 26, § 2661 and 14 Del. C. § 103(c).

Recommendations/Additional Information

This section includes a list of site specific suggestions that are intended to enhance the project. These suggestions have been generated by the State Agencies based on their expertise and subject area knowledge. **These suggestions do not represent State code requirements.** They are offered here in order to provide proactive ideas to help the applicant enhance the site design, and it is hoped (**but in no way required**) that the applicant will open a dialogue with the relevant agencies to discuss how these suggestions can benefit the project.

Department of Transportation – Contact Bill Brockenbrough 760-2109

- DelDOT appreciates the developer’s willingness to provide the proposed 30-foot easement for access to Tax Parcel No. 11-037.00-002. However, given the potential for that land to develop residentially, a 50-foot right-of-way seems more desirable. In either form, the provision for a future connection should be placed opposite one of the proposed streets. However, depending on the results of the TIS, we may find that it is better to have the connection opposite Road E rather than opposite Road C as proposed.
- Without prejudging the results of the noise analysis mentioned above, we point out that traffic noise follows lines of sight. For that reason, if the proposed “noise berm” is needed for that reason, as opposed to landscaping, a more extensive berm may be needed than what is proposed on the plan.
- DelDOT also recommends that paths be provided from the cul-de-sacs at the end of Road C (to Mansion House Road) and Road F (to Mansion Farm Drive) to improve connectivity for pedestrians and cyclists.
- DelDOT supports the recommendation from the Delaware State Housing Authority for alleys and rear parking in the townhouse area of the development. Front parking on through streets, while acceptable, is less safe in that parked vehicles block sight distance for backing vehicles.

Department of Natural Resources and Environmental Control – Contact Bahareh van Boekhold 735-3495

Soils Assessment

- Based on soils survey mapping update, following soil mapping units were mapped on subject parcel (grouped on the basis of drainage class):
 - Well drained – Greenwich (GrB),
 - Poorly drained (hydric) – Fallsington (FgA)
 - Variable drainage (well to poorly; potentially hydric) – Ingleside-Hammonton-Fallsington complex

Additional information on TMDLs and water quality

- Based on a review of existing buffer research by Castelle et al. (Castelle, A. J., A. W. Johnson and C. Conolly. 1994. *Wetland and Stream Buffer Requirements – A Review*. J. Environ. Qual. 23: 878-882.), an adequately-sized buffer that effectively protects wetlands and streams, in most circumstances, is about 100 feet in width. In recognition of this research and the need to protect water quality, the Watershed Assessment Section recommends that the applicant maintain/establish a minimum 100-foot upland buffer (planted in native vegetation) from all water bodies (including ditches) and wetlands (field delineated and approved by the USACE).
- The applicant should calculate post-construction surface imperviousness with all forms of created (or constructed) surface imperviousness (e.g., rooftops, driveways, parking lots, sidewalks, open-water storm water management structures, and roads) included in the calculation.
- Since this project that will likely generate large amounts of impervious cover, we strongly advise, wherever practicable, the use of pervious paving materials (instead of conventional asphalt and concrete) as a Best Management Practice (BMP) to reduce the impacts from all forms of created surface imperviousness.
- We recommend the use of rain gardens, and green-technology storm water management structures (in lieu of open-water management structures) as BMPs to mitigate or reduce nutrient and bacterial pollutant impacts via runoff from impervious surfaces.
- The applicant should voluntarily assess nutrient and bacterial pollutant loading at the preliminary project design phase. To this end, the Watershed Assessment Section has developed a methodology known as the “Nutrient Load Assessment protocol.” The protocol is a tool used to assess changes in nutrient (e.g., nitrogen and phosphorus) and bacterial loading that result from the conversion of individual or combined land parcels to a different land use(s), while providing applicants with quantitative information about their project’s impact(s) on baseline water quality. We encourage the applicant/developer use this protocol to help them design and implement the most effective BMPs. Please contact Lyle Jones at 302-739-9939 for more information on the protocol.

Additional information on hazardous waste sites

- The Site Investigation and Restoration Section (SIRS) strongly recommends that the land owner perform environmental due diligence of the property by performing a Phase I Environmental Site Assessment (including a title search to identify environmental covenants) in accordance to Section 9105(c) (2) of the Delaware Hazardous Substance Cleanup Act (HSCA). While this is not a requirement under HSCA, it is good business practice and failure to do so will prevent a person from being able to qualify for a potential affirmative defense under Section 9105(c) (2) of HSCA.

- Additional remediation may be required if the project property or site is re-zoned by the county.
- Should a release or imminent threat of a release of hazardous substances be discovered during the course of development (e.g., contaminated water or soil), construction activities should be discontinued immediately and DNREC should be notified at the 24-hour emergency number (800-662-8802). SIRS should also be contacted as soon as possible at 302-395-2600 for further instructions.

Habitat Preservation/Species of Concern

- The Division of Fish and Wildlife scientists have not conducted surveys for this project area; therefore, are unable to provide information pertaining to the existence of state-rare or federally listed plants, animals or natural communities at this project site. In the absence of site-specific information, we offer the following comments:

Rare Species

- It is unlikely that species of concern occur within the portions of the parcel that have been previously cleared and in the area proposed for lots. However, there are state-rare species that have been documented in the surrounding forest and these species could occur in the portion of the parcel that occurs north of Mansion House Road. It is unclear from the site plan if the area north of Mansion House Road is going to be left as permanent open space (preferred) or will be utilized for infrastructure and/or future amenities.
- The following state-rare and Species of Greatest Conservation Need¹ (SGCN) occur in the surrounding forest:

Scientific Name	Common Name	Taxon	State Rank	SGCN Tier
<i>Virginia valeriae</i>	smooth earth snake	Reptile	S1	Tier 2

¹ Species of greatest conservation need (SGCN) are indicative of the overall diversity and health of the State’s wildlife resources. Some may be rare or declining, others may be vital components of certain habitats, and still others may have a significant portion of their population in Delaware. SGCN are identified in the Delaware Wildlife Action Plan (DEWAP) which is a comprehensive strategy for conserving the full array of native wildlife and habitats-common and uncommon- as vital components of the state’s natural resources. Congress challenged the states to demonstrate comprehensive wildlife conservation. Delaware, along with all of the other states and provinces throughout the country are working to implement their wildlife action plans. This document can be viewed via the Division of Fish and Wildlife’s website at <http://www.fw.delaware.gov/dwap/Pages/default.aspx>.

<i>Isoetes engelmannii</i>	Engelmann's quillwort	Plant	S2	n/a
<i>Pyrola americana</i>	American wintergreen	Plant	S2	n/a

State Rank: S1- extremely rare within the state (typically 5 or fewer occurrences);
S2- very rare within the state (6 to 20 occurrences);

SGCN Tiers: Tier 1 Species of Greatest Conservation Need (SGCN) are those that are most in need of conservation action on order to sustain or restore their populations. They are the focus of the Delaware Wildlife Action Plan (DEWAP), which is based on analyzing threats to their populations and their habitats, and on developing conservation actions to eliminate, minimize or compensate for these threats. **Tier 2** SGCN are also in need of conservation action, although not with the urgency of Tier 1 species. Their distribution across the landscape will help determine where DEWAP conservation actions will be implemented on the ground. **n/a**-plants are not addressed in DEWAP

- **Smooth earth snakes** inhabit forested areas and can be found under logs, stones and other natural debris. This species does not bite and feeds on earthworms and other soft bodied invertebrates it catches while burrowing. This species breeds in the spring and fall with young born late July to September. Forest clearing, clearing of understory vegetation, and removal of woody debris could impact this species if present.
- **Engelmann's quillwort** is an aquatic emergent perennial that typically occurs along wetland edges and will also grow in areas that temporarily dry out in the summer. **American wintergreen** is a perennial evergreen herb that will grow in moist or dry forested areas. Forest clearing or filling of wetlands could impact these species if present.

Open Space and Recreation

- A major objective of Governor Markell's Trails and Pathways Initiative is to create an interconnected network of pathways for bicyclists and pedestrians within and between communities. Connected communities will result in reduced vehicle trips and expand a safe recreation network for pedestrians and bicyclists. The following recommendations will help enhance the bicycle and pedestrian network within Colony at Summit Bridge East.
- The PLUS application indicates that bicycle paths will be provided, but are not identified in the site design. Please consider formal bicycle pathways within this project.

- The site plan identifies a 30 foot wide access to the adjoining property to the east (Cornerstone United Methodist Church). A formal bicycle and pedestrian access should be provided for residents who wish to access the church property. This will reduce the need for vehicular use to access the church.
- It is commendable that the location of private open space (between lot 134 & 135) to adjoin with the private open space of the parcel to the east. This type of design will allow for future connections between communities if needed.
- As shown on the proposed plan, a majority of the Open Space within the community is located in the lower density area. It is recommended that more open space be provided closer to the higher density area of the community (near the townhouses). Relocating open space will provide a community gathering space where the largest number of community members are located.

Delaware State Fire Marshall's Office – Contact Duane Fox 739-4394

- 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.statefiremarshal.delaware.gov, technical services link, plan review, applications or brochures.

Delaware Department of Education – Contact Despina Wilson 735-4199

- DOE requests developer work with the affected School District transportation department to establish developer supplied bus stop shelter ROW and shelter structures, either at the entrance to the development or interspersed throughout the development as determined and recommended by the that school district.

Delaware State Housing Authority – Contact Karen Horton 739-4263

- DSHA supports the Colony at Summit Bridge East proposal for 150 single family detached, twin, and town home units on 45.32 acres, located on Summit Bridge Road, north of Meadow Glen Subdivision for the following reasons:
 - While large suburban homes have dominated development in Delaware for several decades, a growing body of research indicates that we are in the midst of a significant market shift. The baby boomers that once drove suburban development are now aging and are looking to downsize into something more manageable. The Delaware Population Consortium (DPC) projections for the next ten years indicate that not only will there be a large amount of suburban homes placed on the market by baby boomers, but that there will be a *decline* in households in age ranges that typically seek large homes. These same DPC projections show growth in the younger age

ranges most likely at stages in their life and income to support entry level homes like those proposed.

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, Office of State Planning Coordination

CC: New Castle County