



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

October 23, 2013

Mr. Aaron Chaffinch
Town Manager
Town of Camden
1783 Friends Way
Camden, DE 19934

RE: PLUS review 2013-09-02, Town of Camden Comp Plan Amendment

Dear Mr. Chaffinch,

Thank you for meeting with State agency planners on September 25, 2013 to discuss the proposed Comprehensive Plan Amendment for the Town of Camden. According to the information received, the plan amendment incorporates DelDOT's "Camden By-Pass Option B" plan and also seeks to coordinate and harmonize the Town's future land use maps and land use regulations to reflect current conditions and recent development.

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.

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

Our office has no objections to the proposed Plan Amendment. The amendment incorporates numerous corrections intended to coordinate the Land Use Plan with the Town's Zoning Ordinance and other ordinances. The Delaware Code intends for a local government's comprehensive plan to guide the preparation and adoption of land use regulations intended to implement the plan. Any effort to ensure the plan and ordinances are in harmony is supported by our office. In addition, we note that this amendment will formally adopt the "Camden By-Pass Option B" into the plan. This will provide predictability to both DelDOT and the development community as these areas of town continue to grow and the need for transportation improvements increases.

Recommendations: Our office strongly recommends that the Town consider these recommendations from the various State agencies as you review your plan for final approval. This office has received the following comments from State agencies:

State Historic Preservation Office – Contact Terrence Burns 736-7404

- This comprehensive amendment makes no substantial changes to the plan's sections on historic resources. SHPO applauds Camden's participation in the Transfer of Development Rights program, which can assist in the protection of our farming heritage and archaeological sites that may be on those protected farms. SHPO appreciates Camden's participation in the consultations with DelDOT on changes to the transportation patterns that ultimately will improve noise and vibration issues that Camden's historic properties face now. The Town may be aware that this office has been working [with the Camden Historical Society] over the last year on an update to the Camden Historic District National Register nomination, to better describe and define the properties contributing to the district and to make some changes to the boundary. This will fulfill an effort begun in the 1990s by this office and the then Kent County Preservation Planner, in which an updated district nomination was drafted but never submitted to the Keeper of the National Register. If you have any questions or concerns, please contact Alice Guarrant at 302-736-7412.

Department of Natural Resources and Environmental Control – Contact Kevin Coyle 735-3495

- The language contained on page 9 of the 2013 Amendment to the 2007 Camden Comprehensive Plan, Planning Commission Review Draft 08/14/2013, discusses environmental protection stand-alone ordinances adopted by the Town. The bullets include "Source Water Protection Areas - Ordinance 77" and "Source Water Protection Area Ordinances - Ordinance 2008-O-02." Source Water Protection Areas - Ordinance 77 was submitted to the Department and it was determined that the ordinance was not protective of the resource. It contradicts Source Water Protection Area Ordinances - Ordinance 2008-O-02, which was found to be protective. References to Source Water Protection Areas - Ordinance 77 should be deleted from this plan amendment, the Town Code, and the Town's webpage. Source Water Protection Area Ordinances - Ordinance 2008-O-02 should be the only ordinance referenced.

Department of Transportation – Contact Bill Brockenbrough 760-2109

- In the list of Town, County and State Officials on page i, Michael Petit de Mange and Constance Holland are recognized for their membership in the American Institute of Certified Planners (AICP). It should be recognized that Mary Ellen Gray and Sarah Keifer have the same credential.
- What comments were received at the August 14 public workshop mentioned on page 1? How many people attended? A brief summary should be included in the text. Depending on the number and nature of the comments, it may be appropriate to include a table of comments and responses as an appendix.
- DelDOT is pleased that the Town has included the Option B Bypass Concept, shown and discussed on page 5, in the Plan. Doing so recognizes the work that the Town and DelDOT have done in planning for the Bypass and establishes it as something that the Town wants to have happen.

DeIDOT recommends that text be added saying what the Town intends do to get the Bypass built. What will the Town do to advocate for its construction? When properties along the path of the Bypass are proposed for development or redevelopment, what will the Town require their owners to do? As appropriate, DeIDOT recommends that the Town contact Director of Planning, Mr. Drew Boyce, to discuss these matters. Mr. Boyce can be reached at (302) 760-2111.

- As proposed, the existing and future land use designations and descriptions, on pages 6 and 7, are similar but different. As the current effort is a limited one, DeIDOT does not suggest that the Town change them now, but in the next Plan, we recommend that the Town consider adjusting them to better enable comparison between existing and future conditions. For example, the existing land uses include industrial and utility uses. DeIDOT understands that no new industrial lands are proposed and we would not expect a large increase in land used for utilities, but is it proposed that the existing uses would disappear? Certainly utilities would seem to be a necessity.
- Related to the above comment, Table 2013-4 on page 10 does not indicate what zoning districts accommodate, or would accommodate, industrial and utility uses. If the intention is to make existing industrial uses legal non-conforming and to allow utilities in all districts, that should be made clear.

Once the amendment is adopted by the Planning Commission and Town Council, please forward a copy of the decision regarding the amendment to this office for our files. Thank you for the opportunity to review this amendment. 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: Jamie Fenske
Linda Raab