



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

April 22, 2014

Lee Ann Walling, AICP  
Cedar Creek Planners  
1 South Shore Drive  
Lincoln, DE 19960

RE: PLUS review 2014-03-03; Town of Bridgeville and Town of Greenwood Master Plan Review

Dear Lee Ann:

Thank you for meeting with State agency planners on March 26, 2014 to discuss the Bridgeville/Greenwood Master Plan. State agencies have reviewed the documents submitted and have asked that the following be considered as you move forward to adopt the plan.

**Office of State Planning Coordination – Contact: Dorothy Morris 739-3090**

The Bridgeville/Greenwood Master Plan is a well written document showing the land use and environmental issues facing both towns. Because much of the planning area is outside the municipal boundaries of either town it is important that both towns discuss the master plan with Sussex County so that the County is aware of the issues and the proposed resolutions discussed in the plan.

The document submitted is not being considered as a comprehensive plan update. A comprehensive plan update should focus specifically on each town; their history, their current land use situation, and policy statements and goals for each planning component and for the expected growth for each town. I have attached a checklist of items required in each comprehensive plan for your review.

With that said, the Master Plan is a great visioning document for each town to use as they move forward to review and/or update their comprehensive plans. This document already outlines many of the issues facing each town and should be included in their updated plan as it gives recommendations and options for resolving many of the issues.

The Office of State Planning Coordination looks forward to continuing to work with both towns as they move forward with the adoption of this Master Plan and the update of their comprehensive plans. I have outlined the next steps at the end of this letter.

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

- The Master Plan adequately addresses applicable DelDOT regulations and code requirements, the primary one being the Corridor Capacity Preservation Program. However, DelDOT has significant concerns about the proposed use of this master plan as an update to the Comprehensive Plans for the Towns of Bridgeville and Greenwood. Briefly, the Master Plan was developed as a plan for an area, not a plan for either of the two towns within that area. Consequently, it often does not focus in detail on either town, and to the extent that it does focus, it focuses on Bridgeville to the exclusion of Greenwood.
- As a planning document, the Master Plan should include a separate list, or set of lists, for each Town of specific actions that they plan to undertake and should provide support for why those actions are necessary and appropriate. If this document is to be usable by both Towns as a Comprehensive Plan, it must provide specific guidance for each Town.
- There is a tendency to repeat information from one section to another. Examples of this occur on pages 31 and 36, where information about road improvements associated with Woodbridge High School is presented in the Transportation and Schools sections and on pages 39 through 40 and 42 through 43, where agritourism and geotourism strategies are presented in the Downtown Destination and Plan Implementation sections. One would expect the Plan Implementation section to repeat key points from previous sections, but here material is copied verbatim. DelDOT recommends an effort to provide more substance in the content-oriented sections of the plan and to make the Implementation section more concise.
- DelDOT has several comments on the Downtown Destination section:
  - The section lacks material specific to Greenwood. If the plan is to serve both towns, it should be more balanced.
  - On page 31, the Transportation section mentions a planned bicycle and pedestrian connection from Heritage Shores to downtown Bridgeville near the library. Heritage Shores, when complete, will house a large percentage of Bridgeville's population and this connection would place those residents within easy cycling distance of the downtown area. DelDOT suggests that the Town could build on that asset in two ways. First, it could prioritize construction of the connection. Second, it could make the area near the intersection of Market and Cannon Street more of a destination for Heritage Shores residents who would bicycle there and downtown residents who would walk there. There are a significant number of places to draw people within one block of this intersection, from Jeff's Taproom

and the Senior Center on the west to the firehouse and the Union Methodist Church on the east. There also are good sidewalks, but there is presently no public space in which to gather away from traffic. Adding a small park area, or perhaps just some street furniture, could provide that space and make the area a more appealing place to visit. Regardless of whether Bridgeville agrees with the analysis and recommendations provided here and chooses to include them in the plan, they are examples of the level of detail DelDOT expects in a plan.

- The illustrations in this section include signs for T.S. Smith, a business that is not located in either downtown area, and the Vanderwende Farm Creamery, which is located about two miles east of Bridgeville. A third illustration addresses birding in the Cypress and Pine region of Delaware. DelDOT suggests that photos of downtown Bridgeville and Greenwood would be more appropriate for this section.

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

*A Master Plan for Bridgeville and Greenwood: Sustainable Growth in the Nanticoke Watershed* provides an illustrative, easy-to-read summation of the issues and processes that were addressed over the course of the last three years in response to the Chesapeake Watershed Implementation Plan and the particular situation presented by the wastewater treatment plant that serves the Towns of Bridgeville and Greenwood. As the Towns move forward with the adoption and implementation of the Master Plan, DNREC would ask that both towns take the following information into consideration.

**Source Water Protection**

- To date, neither Bridgeville nor Greenwood has developed source water protection ordinances to protect their drinking water supplies.
- The Groundwater Protection Branch (GPB) referenced the comments to the draft version of this project (PLUS 2012-08-06). In the 2012 review, GPB noted that intended T4 - urban mixed and T30 - employment land uses in wellhead protection and excellent groundwater recharge potential areas have the potential to create large areas of impervious cover and generate contaminants known to compromise ground water quantity and quality.

GPB notes that changes in the final plan shows an increase in T-30 land use within a wellhead protection area in Bridgeville. In addition, land use north of the Greenwood within the area of excellent groundwater recharge potential changed from T2 - suburban to T6 mixed-urban with some reduction in T30 - employment.

- As a master plan for development, it would benefit these communities to adopt protective measures for their sources of drinking water. The adoption of protective ordinances in conjunction with a TMDL plan would allow the Towns to assure a supply of safe drinking water for future generations.
- The Master Plan does recognize the statutory requirement for a source water ordinance. When the town of Bridgeville updates their comprehensive plan, they will be required, per 7 Del. C.

6082(b) to adopt a source water protection ordinance and the plan will be required to have the following information:

- Text of the comprehensive plan must include description of source water requirements in 7 Del. C. 6082(b), and include goals and objectives related to the protection of the resource. This text shall be placed within the water and sewer element of the local government's comprehensive plan, as prescribed by Title 9 or Title 22 of the Delaware Code.
- A map of source water resources (excellent recharge areas, wellhead protection areas) shall be included in the plan. This map must be derived from the most current source water protection datasets<sup>1</sup> provided by the Department of Natural Resources and Environmental Control (DNREC).
- The map and plan text must clearly include the note that the regulatory provisions of any source water ordinance will refer to the most current source water protection datasets<sup>1</sup>.
- The local government shall adopt, after consultation with DNREC, an ordinance that is protective of the resource. The ordinance shall refer to the most current official source water map and relevant data, as provided in the current Comprehensive Plan and as amended from time to time or include a map update procedure.
- 1 <http://www.nav.dnrec.delaware.gov/DEN3/DataDownload.aspx>

### **Delaware Wildlife Species Conservation and Research Program**

- Land included in the Master Plan encompasses some forest blocks, wetlands, headwater streams, habitat that supports rare, threatened and endangered species and key wildlife habitat. Many of these areas are slated for some type of land-use change. A plan to ensure protection of important natural resources is key in a landscape where habitat has already been altered by development and agricultural activities. The intent of providing the information below is to aid in prioritizing ecologically sensitive areas in need of a higher level of protection. It should be noted that the information provided below is based on what is currently known and what could be determined using GIS data such as topographic maps, aerial imagery and wetland maps and not every area within the master plan has been surveyed on-the-ground.

#### **General areas of ecological importance within the entire planning area:**

- Sites that support rare, threatened and endangered species and Species of Greatest Conservation Need (SGCN)<sup>1</sup>
- Wetlands, including isolated but ecologically valuable wetlands such as coastal plain ponds
- Forest blocks
- Forested riparian buffers to rivers and associated tributaries
- Habitat connections across the landscape

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<sup>1</sup> 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>.

**Data sets to consider for Master Planning:**

The following data sets could be overlain on the Master Plan map so that important environmental resources can be located and considered during planning (all of these data layers are available in a GIS format):

- 1) Key Wildlife Habitat<sup>2</sup>
- 2) Delaware Ecological Network (DEN)<sup>3</sup>
- 3) Wetlands (including non-jurisdictional but ecologically significant wetlands such as coastal plain ponds and forested vernal pools)
- 4) State Natural Areas

**Important Natural Resources potentially impacted by proposed land-use in the Master Plan:**

- **Riparian Buffers:** There is a network of streams, including some headwater streams, within the planning area. There are also state-rare wetlands, Atlantic White Cedar, along several water bodies. This habitat type supports rare species and is sensitive to water quality changes specifically changes in pH and sedimentation. Upland buffers along these streams are extremely important for protecting water quality as well as providing critical habitat for wildlife. Many of these streams run through properties that are going to be zoned for land-use changes that include development. The upland buffers along some of these streams have already been reduced in width or degraded by previous land-use practices.

Consideration should be given to implementing 100-foot buffer requirements along these streams and associated wetlands in areas where land-use changes are proposed. Research has shown, in most cases, buffers need to be at least 100 feet in width to effectively protect water quality<sup>4</sup> (buffer widths necessary to support some wildlife species are

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<sup>2</sup> Key Wildlife Habitats (KWH) are rare, have special significance in Delaware, are particularly sensitive to disturbance, and/or have a high diversity of rare plants. Because of these factors, they are known – or expected – to harbor Species of Greatest Conservation Need (SGCN), especially insects that are often dependent on specific host plants. Large blocks of unfragmented forests and wetlands are also considered to be KWH because of their importance to area-sensitive species, particularly vertebrates. KWH can support the full array of species across the landscape and the maps show areas of the state where conservation efforts can be focused. Although designation as KWH is non-regulatory, these maps are intended to help guide site-specific conservation planning efforts.

<sup>3</sup> The Delaware Ecological Network (DEN) is a statewide conservation network developed using GIS and field collected datasets that help to identify and prioritize ecologically important areas for natural resource protection. The DEN includes ecologically important areas such as forests, wetlands, streams, habitat that supports rare species and areas of especially high quality. The DEN includes the following key elements: 1) core areas- contain relatively intact natural ecosystems, and provide high-quality habitat for native plants and animals, 2) hubs-slightly fragmented aggregations of core areas, plus contiguous natural cover and 3) corridors-link core areas together, allowing wildlife movement and seed and pollen transfer between them.

<sup>4</sup> Castelle, A. J., A. W. Johnson and C. Conolly. 1994. *Wetland and Stream Buffer Requirements – A Review*. J. Environ. Qual. 23: 878-882.

larger). Where feasible, if the existing buffer zone is less than 100ft, planting native trees, shrubs, wildflowers, and no-mow grass species to a width of 100ft is highly encouraged. These towns have the opportunity to take the lead and ensure that wetlands and waterways within their current boundaries and those to be annexed are protected from further degradation.

- **Forest Blocks:** There are large, connected forest blocks within the planning area. Some of these forests are in areas proposed for potential land-use changes that include residential, mixed-use, and non-residential development. Forest blocks provide habitat for a variety of wildlife and are extremely important for species sensitive to human disturbance which need larger forest blocks in which to breed/nest. It should be noted that small, forested areas scattered throughout a residential development or within a narrow agricultural buffer zone does not hold the same habitat value for wildlife or same outdoor experience for people as a larger, intact forest block.

Cumulative forest loss throughout the State is of utmost concern to our Division which is responsible for conserving and managing the State's wildlife. Regulations or ordinances to protect forested areas, especially uplands, are generally lacking. Efforts should be made to implement measures that will aide in forest protection within areas that support Species of Greatest Conservation Need (SGCN), mature forests, forested wetlands (especially those with vernal pools and coastal plain ponds that have no regulatory protection but are ecologically important), headwater forests, and large forest blocks. A forest stewardship plan could be drafted to include protection of some forest habitat as open space for wildlife and for the health and enjoyment of residents.

- **Habitat Corridors:** Undeveloped open space connected across the landscape provides a corridor for wildlife as it moves across the land during daily and seasonal migrations. Wildlife corridors support the survival of many species by providing sources of food and water, providing protective cover from predators, shelter from harsh weather, and reconnecting isolated populations. Research studies show a great number of songbirds, game birds, small mammals, reptiles and amphibians, and other wildlife use corridors as a regular part of their life cycles. Many of these corridors occur along waterways and in areas where forest blocks connect.

Wildlife corridors are not a substitute for loss of core habitat; however, with careful planning and design, wildlife corridors can help reduce the negative effects of habitat fragmentation by allowing dispersal of individuals between large patches of remaining habitat. Because a large part of the land in the planning area (outside the municipal boundaries) is not currently developed, a proactive approach should be taken to ensure that important habitat connections are not severed and that large 'patches' of undeveloped open space remain.

- **Rare, Threatened and Endangered Species:** There are rare, threatened and endangered species and SGCN within the Master Plan area primarily associated with wetlands and waterways and within forest blocks. Some species occur in areas designated for some level of development and therefore could be impacted by future land-use changes. It is important to note that most of the planning area has not been surveyed for the potential to support these species.

DNREC highly recommends that coordination with the Delaware Division of Fish and Wildlife is part of the planning process to ensure that impacts to habitat that supports these species is avoided or minimized. Applicants of development projects should also contact the Division to determine if their project activities will impact a state-rare or federally listed species. In some cases a site visit may be requested in order to provide the necessary information. As site plans are reviewed and approved, the Town(s) should consider requiring implementation of recommendations provided by the Division.

Contact information:                   c/o Environmental Review Coordinator  
Wildlife Species Conservation and Research Program  
DNREC-Division of Fish and Wildlife  
4876 Hay Point Landing Rd  
Smyrna, DE 19977  
(302) 735-8658

- Ecological Guidelines: The Town(s) could consider implementing recommendations that are grounded in the eight 'Ecological Guidelines' that DNREC has embraced as its core policy for natural resource protection.

*The eight ecological guidelines are:*

- 1) Maintain large areas of contiguous habitat and avoid fragmenting these areas;
- 2) Maintain meaningful wildlife corridors and potential non-consumptive bicycle and pedestrian connections between habitat areas and adjacent land uses;
- 3) Protect rare landscape elements, sensitive areas, and associated species;
- 4) Allow natural patterns of disturbance to continue to maintain diversity and resilience of habitat types;
- 5) Minimize direct and indirect human disturbances and the introduction and spread of nonnative species and favor native plants and animals;
- 6) Minimize human introduction of nutrients, chemicals, and pollutants;
- 7) Avoid land uses that deplete natural resources over a broad area and allocating such land uses to areas of minimal natural resource impacts; and
- 8) Compensate for adverse effects of development on natural processes.

### **Stormwater Management**

- The Division of Watershed Stewardship Sediment and Stormwater Program recommends that the Towns of Bridgeville and Greenwood incorporate a requirement for a stormwater review into their preliminary approval requirements for new development requests. The *Delaware Sediment and Stormwater Regulations* have been revised and became effective January 1, 2014. A three-step plan review process is now prescribed in the regulations. Proposed development projects must submit a Stormwater Assessment Study for the project limits of disturbance and hold a project application meeting with the reviewing delegated agency as the first step, prior to submitting stormwater calculations or construction drawings, which are steps two and three. Resulting from the project application meeting a Stormwater Assessment Report will be

completed by the reviewing agency and the developer and forwarded to the Towns of Bridgeville and Greenwood. This Stormwater Assessment Report will rate the anticipated engineering effort necessary to overcome certain stormwater assessment items such as soils, drainage outlets, and impervious cover. The Sediment and Stormwater Program recommends that the Towns of Bridgeville and Greenwood consider the ratings from the Stormwater Assessment Report in making a decision to issue preliminary approval for any development request by incorporating the Stormwater Assessment Report as a required element when a plan is submitted into the municipal preliminary plan approval process.

The revised *Delaware Sediment and Stormwater Regulations*, effective January 1, 2014, have a goal of reducing stormwater runoff for the rainfall events up to the equivalent one-year storm, 2.7 inches of rainfall in 24 hours. Runoff reduction encourages runoff to infiltrate back into the soil as in the natural pre-development system and results in pollutant removal and stream protection. Best management practices (BMPs) that encourage infiltration or reuse of runoff, such as porous pavements, rain gardens, rain barrels and cisterns, green roofs, open vegetated swales, and infiltration systems should be allowed for new development sites within the Towns of Bridgeville and Greenwood. Furthermore, limiting land disturbance on new development projects and limiting impervious surfaces by allowing narrower street widths, reducing parking requirements, and allowing pervious sidewalk materials will be necessary to help achieve the runoff reduction goals in the revised regulations.

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

The agency may provide commentary and/or suggestions to the applicant that is related to the agency's area of expertise. Commentary and recommendations must be proactive, constructive, and specific to the application that is the subject of the PLUS review. If an agency comment or recommendation is not based on Delaware Code or an adopted policy or regulation, then it must be reported in this section.

- DSHA offers the following comments:
  - Overall, this is a well thought out Master Plan that includes an appropriate housing analysis that addresses housing issues pertinent to both the Town of Bridgeville and the Town of Greenwood. DSHA is supportive of the strategies as they focus on more “town-like” development, reducing low-density, land-consuming sprawl, as well as, promoting infill. Not only do they provide a wide variety of housing options to residents with various incomes and at different stages of life, they are responsive to changing demographic trends that are dramatically impacting the housing market. Research shows that communities most responsive to market trends will be more successful in attracting new residents and businesses.
  - Assuming that that this information will be fed into the Comprehensive Plans of both communities, DSHA takes this opportunity to encourage municipalities receiving federal funds for housing to be aware of their Civil Rights obligations at the U.S. Department of Housing and Urban Development (HUD). Specifically, federal fund recipients are obligated to Affirmatively Further Fair Housing (AFFH) by taking proactive steps to

promote racially, ethnically, and socioeconomically diverse communities. To assist with this obligation, in July 2011, DSHA collaborated with the Cities of Wilmington and Dover, and New Castle County to conduct the *Statewide Analysis of Impediments to Fair*

*Housing Choice*. (<http://www.destatehousing.com/FormsAndInformation/pubs.php>).

The Analysis contains several recommendations for local jurisdictions. These include the following:

- Local government entities throughout the State of Delaware should reduce and/or waive their respective sewer, water, and/or public facilities and services impact fees for area developers and non-profit organizations seeking to build affordable housing units, both renter and owner units.
  - Ease zoning and other regulatory barriers to affordable rental housing for families.
  - Area localities should encourage members of appointed boards and commissions, elected officials, real estate agents, and municipal and county staff that deal with housing, community development, zoning, and code enforcement issues to attend an annual fair housing training.
- o DSHA offers technical assistance to both Towns in reviewing tools and strategies to increase affordable housing opportunities within their communities.

### **Next Steps**

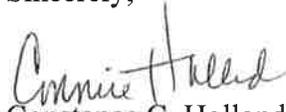
1. Each town should consider the comments of the PLUS letter to determine if changes should be made to the draft Master Plan. At that point the Master Plan should be adopted by each town.
2. Each town should review their current comprehensive plan for updating. Normally a comprehensive plan would be amended to include an adopted master plan; however, both towns are approaching their update deadlines so we encourage you to consider making the adopted master plan part of the updating process.
  - a. Bridgeville Comprehensive Plan was certified in 2006. The 5 year review mark has passed and an update is due 2016. As the population of Bridgeville has reached exceeded 2,000 since the certification of their plan in 2006, they will be required to, at the very least, create a Sourcewater Protection Ordinance and include language in the updated plan regarding Sourcewater Protection.
  - b. Greenwood Comprehensive Plan was certified in 2007. The 5 year review mark has passed and an update is due in 2017.

The Office of State Planning would like to meet with each town to discuss your options for reviewing and updating their comprehensive plan but the adopted master plan, including the master planning maps, should be added to each the plan during the update process.

3. Each town should look at their current regulations to determine if changes need to be made to ensure that the recommendations noted in the plan can be accomplished.

Thank you for the opportunity to review the Bridgeville/Greenwood Master Plan. If you have any questions, please contact me at 302-739-3090.

Sincerely,



Constance C. Holland, AICP

Director, Office of State Planning Coordination

CC: Town of Bridgeville  
Town of Greenwood  
Ed Lewandowski, U of D