



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

June 22, 2017

Debbie Pfeil
Town of Blades
20 West Fourth Street
Blades, DE 19973

RE: PLUS 2017-05-02, Blades Comprehensive Plan Pre-Update

Dear Debbie,

Thank you for meeting with State agency planners on May 24, 2017 to discuss the update of the Town of Blades comprehensive plan. State agencies have reviewed the documents submitted and have asked that the following be considered when you update your plan for certification.

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

The existing Town of Blades comprehensive plan was certified April 2008, making them due for an update by April 2018. Per our discussions Blades does not feel that a major overhaul of the current plan is needed and therefore asked for a Pre-Update review to determine the information that needs to be updated for certification.

The Office of State Planning looks forward to working with Blades and offers any assistance it can in the process.

The 2010 Census reported Blades population as 1241 so Blades would need to meet all criteria for those municipalities under 2000 per our Comp Plan Checklist (copy attached)

Other items the town should consider are:

- Updating all demographics,
Updating all maps to ensure the correct municipal boundary is shown and that the newest Strategies for State Policies and Spending levels are depicted.
- Any additions to the annexation area should identify the proposed future land use
- The Town of Blades has a large area of concern – As part of the update, the town should work with Sussex County and Seaford to create or update an MOU regarding the notification of development in the area of concern.

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- The town will also need to follow the public process of adopting the new plan and document the process in the plan.

In addition, the State agencies have reviewed the existing plan and made recommendations regarding items that should be updated as follows:

Department of Transportation – Contact: Bill Brockenbrough 760-2109

- The 2008 Plan recommends three traffic-related studies: a truck study focused on the Market Street, High Street and River Road, an intersection improvement study pertaining to the intersection of Market and High Streets, and a pedestrian and bicycle study. Have any of these studies been done?

Since the 2008 Plan was certified, crosswalks have been painted at the intersection of Market and High Streets but DeIDOT does not know of any of the above studies having been done.

DeIDOT is willing to work with the Town, as they recently have in extending the 45 mph speed limit zone on northbound US Route 13 but the above studies would be the primary responsibility of the Town. A possible exception would be the pedestrian and bicycle study if it were to be conducted through the Transportation Alternatives Program (TAP). More information on TAP program is available at http://www.deldot.gov/information/community_programs_and_services/tap/index.shtml or by contacting Ms. Ann Gravatt, a Planning Supervisor in DeIDOT's Local Systems Improvement Section. Ms. Gravatt may be reached at (302) 760-2254 or Ann.Gravatt@state.de.us.

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

The Department envisions a Delaware that offers a healthy environment where people embrace a commitment to the protection, enhancement and enjoyment of the environment in their daily lives; where Delawareans' stewardship of natural resources ensures the sustainability of these resources for the appreciation and enjoyment of future generations; and where people recognize that a healthy environment and a strong economy support one another.

DNREC's intent is to offer recommendations to improve conservation and protection of the Town's resources and to improve the plan elements related to environmental protection, open space, recreation and water quality and supply. DNREC would welcome the opportunity to meet with the Town in a collaborative manner to discuss these recommendations and possible future ordinances.

Recommendations for Comprehensive Plan Revisions

Growth and Annexation (p. 33).

- DNREC recommends dividing any future annexation areas into sub watershed planning areas. By utilizing the natural drainage pattern, the Town may be able to combine habitat protection, recreation, and storm water management. The Town would need to partner with Sussex County as the watersheds extend out of the potential expansion area identified by the Town.

Soils (p. 60)

- The soil survey and some soil mapping units have been updated; therefore, DNREC suggests the following named soil mapping units as replacements/substitutes for the Evesboro-Rumford Association in the existing soils narrative: Henlopen-Rosedale urban land complex and Runclint. The interpretations of soil drainage (e.g., Runclint is excessively well drained while Henlopen-Rosedale urban land complex is somewhat excessively well drained) differ little from the Evesboro-Rumford Association mentioned from the old soil survey.

Water Supply/Allocation

- Blades' current water use is 2.0 to 3.5 million gallons per month. The allocated well capacity is 3.9 million gallons per month, or about 11% above current peak use. This capacity is unlikely to be sufficient to meet the projected 38% growth in the Comprehensive Plan. The current rate of water losses (22% in 2016) will limit the real capacity of the wells even further.

The Town has recently added a third well, but has not yet applied to add this well to its allocation. During the permitting process, the Water Allocation Branch will be able to assess the increase in wellfield capacity and compare it to projected demand. The Town will also have to propose a solution to their excessive water losses and propose a water conservation plan.

Lacking updated permits, DNREC is not able to assess the Town's ability to meet its proposed future demand. This could rise to the level of a certification issue.

Source Water Protection.

- The Town passed and adopted a source water protection ordinance on June 8, 2009 in compliance with 7 Del. C. 6082(b).

The Comprehensive Plan must include:

- 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* 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*.
- Discuss the Town's new wells.

*<http://www.nav.dnrec.delaware.gov/DEN3/DataDownload.aspx>

Total Maximum Daily Loads (TMDLs) and the Chesapeake Bay Watershed Implementation Plan (WIP)

- In December 2008, the Total Maximum Daily Load reduction (TMDL) for nutrients (e.g., nitrogen & phosphorus) and bacteria was established for the Nanticoke River watershed. In 2009, a Pollution Control Strategy (PCS) was adopted to establish strategies that meet the TMDL nutrient load reductions. However, a subsequent EPA assessment of these TMDL reduction requirements and PCS deemed them "insufficiently protective enough" to meet the water quality goals and strategies in the Nanticoke PCS. Consequently, EPA developed a "more stringent" TMDL reduction requirement for nitrogen and phosphorus; this TMDL now requires a 60 percent reduction in nitrogen and phosphorus (previously was 30 and 50 percent for N & P) from baseline conditions. The TMDL reduction requirement for bacteria, however, remains unchanged and still requires a 2 percent reduction in bacteria from baseline conditions.
- As part of the TMDL, each jurisdiction is required to develop a Watershed Implementation Plan (WIP) that details how load goals will be achieved and maintained into the future. The WIP identifies specific pollution reduction practices (i.e., BMPs) and programs to reduce nitrogen, phosphorus, and sediment from a variety of sources that discharge to waters in the greater Chesapeake Basin. Thus the WIP is an essential component for attainment of Delaware's Water Quality Standards, ultimately leading to the restoration of a particular waterbody's (or watersheds) designated beneficial use(s). The WIP is a multiphase process consisting of three phases. The first two phases have been completed, with the third phase scheduled for completion in 2017. The WIP will include both regulatory and non-regulatory components. Additional information about the WIP can be obtained from the following website:
http://www.wr.dnrec.delaware.gov/Information/Pages/Chesapeake_WIP.aspx.
- In 2011 – 2012, the Town of Blades worked with DNREC and the consulting firm of Tetra Tech on a review of the Town's codes and ordinances. At that time, the Town was looking toward the 2018 Comprehensive Plan update and would continue to review and update codes and ordinances as necessary. Particular focus was on codes and ordinances that allow for and encourage protection and improvement of local water resources. There

were recommendations to modify existing codes and ordinances to remove barriers for implementing acceptable practices. At the end of their review, Tetra Tech provided the Town with a review of their local ordinances along with a set of recommendations for the Town to consider as they went through the review and update of ordinances preparing for the 2018 Comprehensive Plan update. In addition, Tetra Tech provided the Town with model ordinances for the Town's consideration. Has the Town acted on any of the recommendations?

Stormwater Management

- The State of Delaware has developed a National Pollutant Discharge Elimination System (NPDES) General Permit for storm water discharges from Small Municipal Separate Storm Sewer Systems (MS4s). This permit addresses the federal requirements under the Clean Water Act (CWA) to reduce polluted storm water runoff that is contributed by the MS4 and which ultimately discharges to local rivers and streams without treatment.
- The permit is organized around the six minimum control measures— public education, public involvement, illicit discharge detection and elimination, construction, new development, and good housekeeping. For the purposes of this permit, the public education and involvement requirements have been combined into one permit provision. To provide additional protection to the impaired waterbodies of Delaware, the permit also includes measures to involve the permittee in the industrial storm water permitting process and to more directly address the impairment status of those waterbodies to which their MS4 discharges.
- The permittee must develop and implement a comprehensive storm water management program designed to control the quality of the storm water discharged from its MS4. The Storm Water Pollution Prevention and Management Program (SWPP&MP) shall contain measurable goals and shall describe the controls necessary to effectively prohibit the discharge into the MS4 of any materials other than storm water. The SWPP&MP must also outline measures that will reduce the discharge of pollutants from the MS4 and include a schedule for implementation.

Please contact Jennifer Roushey at Jennifer.Roushey@state.de.us or 302-739-9946 for additional information.

Flood Management

- Please ensure that the Plan maps reflect the new Flood Insurance Rate Maps (FIRMs) for the Town, which became effective on March 2, 2015.

Preparing for a Changing Climate

- Sea level rise is one of several climate change impacts that can affect communities, the others being variable precipitation and increasing temperatures. Together, precipitation and accelerated sea level rise contribute to increased flooding. The Climate Framework for Delaware recommends that DNREC, through the Division of Energy and Climate,

provide technical support to local governments, in coordination with the Office of State Planning Coordination (OSPC), to enhance focus on climate impacts (including the reduction of greenhouse gas emissions) and long-term sustainability (through adaptation and mitigation) in the comprehensive plan and in implementing ordinances. With that in mind, DNREC requests the opportunity to work with the Town and their consultants to develop language for the comprehensive plan that addresses climate change impacts, as well as adaptation and mitigation strategies for the Town to pursue through implementing ordinances.

Sea Level Rise

- Since the Town's 2008 Comprehensive Plan a number of resources are available for the Town of Blades to plan for sea level rise.

Delaware Sea Level Rise Advisory Committee

To adapt to sea level rise, the Delaware Sea Level Rise Advisory Committee published the Preparing for Tomorrow's High Tide: Recommendations for Adapting to Sea Level Rise in Delaware, (September 2013)

<http://www.dnrec.delaware.gov/coastal/Documents/SeaLevelRise/FinalAdaptationPlanasPublished.pdf>

Executive Order Number Forty-One

"Preparing Delaware for Emerging Climate Impacts and Seizing Economic Opportunities from Reducing Emissions" was signed on September 12, 2013. <http://governor.delaware.gov/wp-content/uploads/sites/24/2016/12/EO041.pdf>

Determination of Future Sea-Level Rise Planning Scenarios

The Delaware Geological Survey will review recent scientific literature and assessments of sea-level change in Delaware and identify appropriate scenarios to use for planning purposes throughout the state. The release of the International Panel on Climate Change (IPCC) Fifth Assessment Report (AR5) in 2013 and the NOAA National Climate Assessment indicates that the rate of sea level rise is likely to increase. This project will also develop new inundation maps along Delaware's coast that correspond to the identified projections. It is not clear if this project will be completed in time for the town's new plan but it should be helpful for the Town of Blades to have the information when it is available.

<http://www.dgs.udel.edu/projects/determination-future-sea-level-rise-planning-scenarios-delaware>

Resilient Community Partnership

The Delaware Coastal Programs (DCP) intends to repeat implementation of its "Resilient Community Partnership" program to assist a community with improving its resilience to

hazardous weather and climate change. Resilience planning improves a community's capacity to prepare for and recover from coastal and inland flooding, erosion, sea level rise and other impacts.

Through the partnership, DCP offers direct staff support, policy expertise, technical assistance and funding to help a community through the resilience planning process. Recognizing communities may just be starting the process or several steps along the way, the DCP will provide the support necessary to further a community's efforts through the stages of assessment, planning and implementation.

Typical eligible communities are any incorporated municipality or county within the State of Delaware. An unincorporated area may also apply with an expressed commitment by the county in which it is located to serve as a project sponsor and support its efforts throughout the process.

If you have questions or would like additional information about the partnership, please contact the Delaware Coastal Programs at (302) 739-9283 to speak with (or email) Danielle Swallow or Dr. Bob Scarborough.

Coastal Training Program

The Delaware National Estuarine Research Reserve's Coastal Training Program is serving on the Steering Committee for the Delaware Resilient and Sustainable Communities League (RASCL). RASCL is made up of practitioners from across Delaware who interface with community decision makers in order to help them create more sustainable and resilient communities. Members include representatives from several DNREC Divisions, DelDOT, DEMA, Sea Grant, Delaware Geographic Survey, UD Institute for Public Administration, Delaware Center for Inland Bays, and the Del. Office of State Planning Coordination. For more information, please contact Kelly Valencik, the Coastal Training Program Coordinator at kelly.valencik@state.de.us or (302) 739-6377.

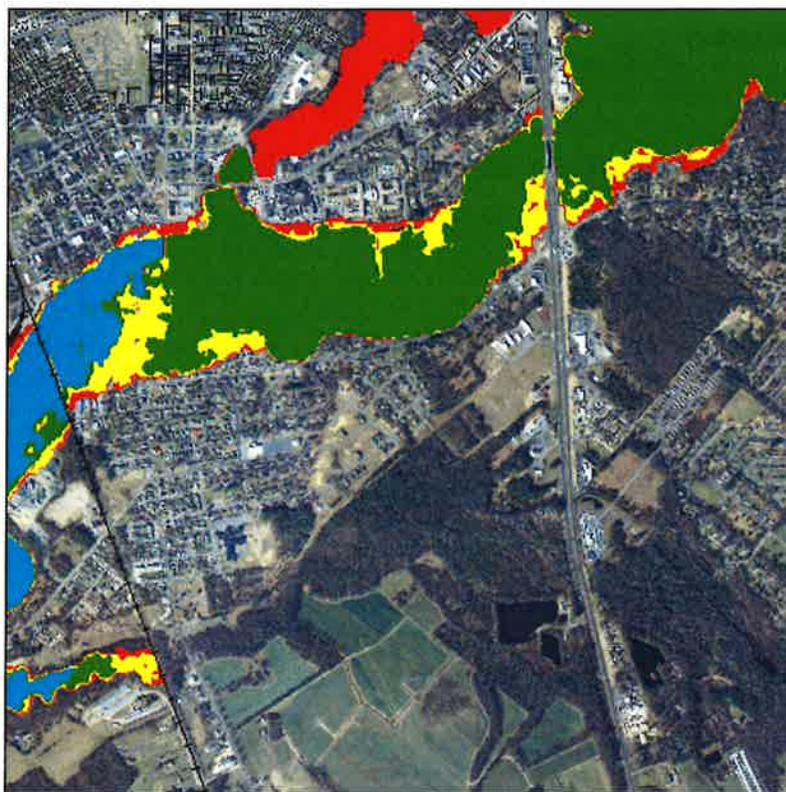
Sea Level Rise Inundation Maps

Portions of the Town of Blades and its surroundings will be subject to direct and permanent inundation from sea level rise. For more information on the Sea Level Rise Inundation Maps please see: (<http://www.dnrec.delaware.gov/Pages/SLRMaps.aspx>).

Sea levels in Delaware have risen by about a foot over the past century (NOAA, 2014). This rate of sea level rise is likely to accelerate in the coming decades as a result of global climate change and local subsidence. Accelerated sea level rise will result in permanent flooding of low-lying coastal areas and increased risk of flood damage during storms (DNREC, 2012).

Recommendations:

1. The Town should consider additional land use controls for the areas subject to 1.5 meter of sea level rise.
2. To reduce the costs of providing infrastructure the Town should consider not permitting roads, sewer or water to be extended into areas subject to 1.5 meter of sea level rise.
3. The Town should consider avoiding new structures within a mapped Sea Level Rise Area. Where such development cannot be avoided, new structures should be built with an additional 18 inches of freeboard to protect the health, safety and general welfare of people occupying and using the structures.
4. If you would like any additional information please contact Delaware Coastal Programs at (302) 739-9283.



Blades 2017-05-02

Legend

- Rail Roads
- Current MHHW
- 0.5 meters SLR
- 1.0 meters SLR
- 1.5 meters SLR

0 0.125 0.25 0.5 Miles



Parks and Recreation

- In August of 2011, the Delaware Division of Parks and Recreation conducted a telephone survey of Delaware residents to gather information and trends on outdoor recreation patterns and preferences as well as other information on their landscape perception. These findings are the foundation of the 2013-2018 Statewide Comprehensive Outdoor Recreation Plan (SCORP) providing guidance for investments in needed outdoor recreation facilities and needs within county and municipal comprehensive plans. For the purpose of refining data and research findings, Delaware was divided into five planning regions. The Town of Laurel is located within SCORP Planning Region 4.
- When looking at the findings from the 2011 telephone survey, it is apparent that Delawareans place a high importance on outdoor recreation. Statewide, 93% of Delaware residents indicated that outdoor recreation had some importance in their lives, while 67% said it was very important to them personally. These findings are very close to the results of the same question asked in the 2008 public opinion telephone survey, indicating a continued demand for outdoor recreation opportunities throughout the State.

Placing high importance on outdoor recreation resonates throughout the five SCORP regions. In Region 4 (Western Sussex County), 66% said it was very important to them personally.

Outdoor Recreation Needs/Priorities

Based on the public opinion survey, the most needed outdoor recreation facilities in Blades include:

High facility needs:

- Walking and Jogging Paths
- Public Swimming Pools
- Hiking Trails
- Fishing Areas
- Community Gardens
- Playgrounds
- Bicycle Paths
- Basketball Courts
- Picnic Areas
- Off-Leash Dog Areas

Moderate facility needs:

- Camping Areas
- Football Fields
- Ball Fields

- Boat Access
- Soccer Fields
- Canoe/Kayak Launches
- Skateboarding Areas
- Public Golf Courses
- Tennis Courts

Recommendation: The Town of Blades is encouraged to work toward incorporating and/or continuing to offer some of these opportunities in the development of their Comprehensive Plan.

Air Quality

- It is recommended that “mitigation measures to improve the town’s existing air quality” or “protection of Delaware’s airshed quality” be added to the environmental recommendations list under “Recommendation 4 –Best Practices for Development”. According to the Town of Blades updated comprehensive plan, “Blades maintained a somewhat younger population than either the state of Delaware or Sussex County” with the median age being “3.7 years younger than that of Sussex County and just under than that of the state”. Also included in the plan was that “14.3% of the population of the Town of Blades are aged 0-19”. Another key demographic was those 65 years of age and older which represented 15.19% of the population according to the 2000 Census (page 16).

Young children, the elderly and those with pre-existing conditions (i.e.: cardiovascular disease, emphysema and asthma) are considered “at risk” due to the negative impacts of air pollution.

However, the Town of Blades can take steps to ensure that it combats the adverse effects of air pollution. A component of improving existing air quality levels is to maximize multi-modal travel through bike lanes, sidewalks and convenient access to transit opportunities. DNREC was pleased to see that “Pedestrian facilities” and the implementation of a “park-and-ride” were made a transportation priority in the plan and that quality of life was mentioned (page 48-49). The Town of Blades is encouraged to address any gaps in the current bicycle and pedestrian network for increased connectivity. Multi-modal travel can significantly reduce mobile source emissions. For every vehicle trip that is replaced by the use of a sidewalk or bike path, 7 pounds of VOC and 11.5 pounds of NOx are reduced each year. A key component that is also crucial to multimodal travel is the convenience of transit opportunities. The Town is recommended to continue to work with DTC to provide convenient, continuous and timely transit access to residents in the Blades area. It was also mentioned that the Town of Blades is taking steps to evaluate the air quality impacts of vehicular traffic through the recommendation of a truck traffic study in the area. DNREC was also pleased to see that the Town is taking the issue of truck traffic seriously. Trucks have the potential to emit harmful particulate matter (PM) in various sizes (PM 10) which can be embedded in our lungs and (PM 2.5) which is small enough to be absorbed into the bloodstream.

- The Town of Blades is also encouraged to expand its tree canopy. According to the Delaware Forest Service, in 2014, the Town of Blades' tree canopy percentage was 45.9%. Native trees reduce emissions by trapping dust particles and replenishing oxygen. Trees also reduce energy emissions by cooling during the summer and by providing wind breaks in the winter, whereby reducing air conditioning needs by up to 30 percent and saving 20 to 50 percent on fuel costs. All urban trees that are selected should be native to Delaware.
- Lastly, it is recommended that the Town of Blades continue to re-examine existing facilities to see where gateways and place-making components can be added such as streetscape elements (landscaping, lighting, pedestrian centers, mixed use areas and signage) in order to generate a Complete Community that incorporates smart growth scenarios and lessens the potential for urban sprawl. Should the developer have any more questions or concerns, the DAQ point of contact is Lauren DeVore, and she may be reached at (302) 739-9437 or lauren.devore@state.de.us.

Solid Waste and Recycling

- Trash collection is mentioned on Page 54 with no mention of the collection of recyclables. The Universal Recycling Law (*7 Del. C. §6053*) requires all waste service providers (including a municipality that uses contractors for service) to provide recycling collection to their residential customers. Municipalities that provide trash and recycling services can demonstrate some of the lowest prices in Delaware.
- Delaware Law and Regulations specify that the 'commercial sector' shall participate in a comprehensive recycling program. As such, all those involved with the planning of new facilities should give consideration to space for collection of recyclables that would be typically generated. For example, an engineer might develop a facility site plan that shows a curb cut and fencing around space for a trash dumpster. To later site an adjacent recycling dumpster could be difficult and costly. But if that space were allocated in the planning phases, it would be so much easier. Please take this into consideration for your comments for all new construction. The commercial sector includes all for-profit, not-for-profit, institutional, charitable, educational, health care, and government organizations.

DNREC Recommendations for Ordinances and Plan Implementation

Community Facilities (Infrastructure Plan, p. 40)

- Stormwater is mentioned within the comprehensive plan but it is unclear what role the Town has in providing stormwater management for the residents. DNREC would like for you to consider addressing the following items in either the comprehensive plan or within a land development code.

- Be advised the Sediment and Stormwater Program is currently undergoing revisions to the sediment and stormwater regulations. It is unclear at this time when the new regulations will be promulgated.
- The Division of Watershed Stewardship is requesting that the Town incorporate a requirement for a stormwater and drainage review into the Town's pre-approval requirements for new development requests. Proposed development projects should hold a project application meeting with the delegated agency, the Sussex Conservation District, to discuss stormwater and drainage prior to the town reviewing and/or approving plans or issuing building permits. The Sediment and Stormwater Program requires a project application meeting for all proposed land disturbing activities that require a detailed Sediment & Stormwater Plan within the coming year. These meetings are structured to assist developers in the design process and for early notification of approval requirements. In order to schedule a project application meeting, the applicant must forward a completed Stormwater Assessment Study (SAS) to the appropriate Delegated Agency. Please contact Elaine Webb with the DNREC Sediment and Stormwater Program if you have any questions regarding this new process. Please note that this process does not replace the State's PLUS process.
- As the Town of Blades updates any land use or subdivision codes, the Sediment and Stormwater Program requests the town make a note of the Sediment and Stormwater requirements on any construction - related project application checklists, etc.
- Lines and grades: If the Town does not have a lines and grades requirement for new construction, the Division recommends this be considered to help resolve drainage issues arising from new construction during and post construction. County/municipal building inspectors would be able to use approved lines and grades requirement to field verify prior to issuance of Certificate of Occupancy or building permit, as appropriate.
- Explore the feasibility of stormwater utility to fund upgrades to existing stormwater infrastructure. Upgrades to the stormwater system may reduce pollutant loads and help reach the established total maximum daily load for nitrogen, phosphorus, and bacteria. Reach out to the Sussex Conservation District, Sussex County and the Delaware Water Infrastructure Advisory Council as partners in funding stormwater retrofits.
- Consider adding upgrades to stormwater infrastructure when developing a Capital Improvements Program.
- Consider addressing stormwater when developing an adequate public facilities ordinance. Ensure adequate stormwater outlets, easements, and infrastructure is available at time of subdivision.

- Evaluate the existing drainage patterns within the future annexation area to ensure adequate drainage for the cumulative stormwater impact upon full build out of the annexation area. The Town should be mindful of potential stormwater impacts from the Town onto county residents.
- The Town should pursue drainage easements along waterways, ditches, and storm drains where currently there is none. The Conservation Programs Section is not suggesting the Town assume primary responsibility for the routine maintenance, such as mowing, on the conveyances. However, the Town should have the ability to remove blockages either natural or manmade.

Wetlands Delineations:

Recommendation: Include wetlands setbacks as part of the ordinances to protect environmental resources. Wetlands should be protected and setbacks of un-subdivided open space should surround them. No portion of any building lot should be within the setback. During prolonged wet periods, the area within the wetland setback may become too wet for normal residential use. Designation as open space will aid in the prevention of decks, sheds, fences, kennels, and backyards being placed within the setback thereby reducing nuisance drainage complaints.

Recommendation: Require all applicants to submit to the Town a copy of the development site plan showing the extent of State-regulated wetlands (as depicted by the State Wetland Regulatory Maps), and a United States Army Corps of Engineers (USACE) approved wetlands delineation as conditional approval for any new commercial and/or residential development. Additionally, the site plan should depict all streams and ditches which are jurisdictional pursuant to the Subaqueous Act (7 Del. C., Chapter 72) as determined by DNREC.

Freshwater Wetlands Protections:

Recommendation: Implement regulations to protect freshwater wetlands where regulatory gaps exist (i.e., isolated wetlands and headwater wetlands).

100 Foot Upland Buffer:

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 water quality in 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.

Recommendation: Require a 100-foot upland buffer width from all delineated wetlands (approved by the USACE and DNREC) or water bodies (including ditches).

Impervious Surface Mitigation Plan:

Recommendation: Require the calculation for surface imperviousness (for both commercial and residential development) take in to account all constructed forms of surface imperviousness - including all paved surfaces (roads, parking lots, and sidewalks), rooftops, and open-water storm water management structures.

Recommendation: To encourage compact development and redevelopment in the Town’s central business area, require an impervious surface mitigation plan for all residential and commercial developments exceeding 20% imperviousness outside that area, or at least in excellent recharge areas outside that area. The impervious surface mitigation plan should demonstrate that the impervious cover in excess of 20% will not impact ground water recharge, surface water hydrology, and/or water quality of the site and/or adjacent properties. If impacts to groundwater recharge, surface water hydrology will occur, the plan should then demonstrate how these impacts will be mitigated. If the impacts cannot be mitigated, the site plan should then be modified to reduce the impacts from impervious cover.

Poorly Drained (Hydric) Soils:

Recommendation: Prohibit development in poorly or very poorly-drained (hydric) soil mapping units. Building in such areas predictably leads to flooding and drainage concerns from homeowners, as well as significant expense for them and, often, taxpayers. Proof or evidence of hydric soil mapping units should be provided through the submission of the most recent NRCS soil survey mapping of the parcel, or through the submission of a field soil survey of the parcel by a licensed soil scientist.

Green Technology Stormwater Management:

Recommendation: Require the applicant to use “green-technology” storm water management in lieu of “open-water” storm water management ponds whenever practicable.

State Historic Preservation Office (SHPO) – Contact: Terrence Burns 739-5685

- The Delaware State Historic Preservation Office has identified a potential historic district in Blades. In Chapter 2-5 of the Historic and Cultural Resource Plan, the goal of Town is to balance the preservation and enhancement of significant historical and cultural features by the following recommendations:

- 1: Encourage Stabilization and Repair of Older Structures;
- 2: Consider Pursuing a National Register District; and
- 3: Identify and Protect Important Historic and Cultural Sites in Blades.

The plan should include specific actions to meet these recommendations. For example, the Town could do an update survey to determine if any historic properties have been demolished and to determine if the boundaries of the proposed district should change. We can provide the potential historic district boundaries previously identified as a place to start. If the Town has any questions or concerns, please call Madeline Dunn at 302-736-7417.

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

DSHA offers the following information as the Town prepares its Comprehensive Plan Update:

- The 2015-2020 Housing Needs Assessment (HNA) is a great resource and can be found at the below link. There is the full document, executive summaries, handouts, a reporting portal (that takes you to an interactive map). <http://www.destatehousing.com/FormsAndInformation/needs.php>
- In addition to the *2015-2020 Statewide Housing Needs Assessment*, the following housing information is available on DSHA's 'Research and Plans' website <http://www.destatehousing.com/FormsAndInformation/datastats.php>. DSHA updates this data regularly and produces the following reports:
 - Sussex County Housing Fact Sheet – http://www.destatehousing.com/FormsAndInformation/datastatmedia/ds_sussex_fs.pdf
 - Median Home Price and Affordability Gap data for each year for the most recent quarter and the past 10 years - <http://www.destatehousing.com/FormsAndInformation/affordgap.php>
 - Sheriff Sale data from 2008 to 2016 by Zip Code – http://www.delawarehomeownerrelief.com/media/sheriffsale_2008_sussex.pdf
 - Monthly Foreclosure and Sheriff Sale Data - <http://www.delawarehomeownerrelief.com/data.php>
- DSHA encourages 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/fairhousing.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.
 - Review how 'family' is defined and remove undue restrictions on group homes.
 - Incentivize the development of mixed-income housing in non-impacted areas.
 - 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.

- DSHA offers technical assistance to the Town in reviewing tools and strategies to increase affordable housing opportunities within the Town.
- DSHA has developed a website, **Affordable Housing Resource Center**, to learn about resources and tools to help create housing for households earning 100% of median income or below. Our website can be found at: www.destatehousing.com "Affordable Housing Resource Center" under Other Programs.

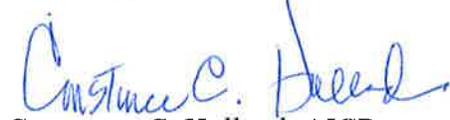
If you have questions or would like more information on the above recommendations, please feel free to call me at (302) 739-4263 ext. 251 or via e-mail at karenh@destatehousing.com.

Sussex County – Contact: Planning and Zoning 855-7878

- Wastewater from the Blades Sanitary Sewer District (Blades SSD) is currently treated at Seaford's wastewater treatment facility. Sussex County's agreement with Seaford provides for incremental increases in treatment capacity to a maximum of 240,000 gallons per day from the Blades SSD, which is projected to be adequate for the existing Sewer District, as well the Towns growth and annexation area for the near future. The study also determined what upgrades to the existing collection and transmission system are required to provide sewer service to the Town's recently annexed area east of Route 13. For questions regarding these comments, contact Rob Davis, Sussex county Engineering Department at (302) 855-7820.
- Sussex County is also undertaking revisions to the County Comprehensive Plan and a meeting with Planning and Zoning Department Staff to coordinate future growth plans is recommended. Please contact the Planning and Zoning Department at (302) 855-7878.

Since this was a Pre-update meeting for your plan update, we will need to see the completed document at a regular PLUS meeting once the town Planning Commission has approved the draft plan for public review. Thank you for the opportunity to review this update. If you have any questions, please contact me at 302-739-3090.

Sincerely,



Constance C. Holland, AICP
Director, Office of State Planning Coordination

Attachment

Preliminary Land Use Service (PLUS) Application

Municipal Comprehensive Plans

Delaware Office of State Planning Coordination

122 Martin Luther King Jr. Blvd., South • Dover, DE 19901 • Phone: 302-739-3090 • Fax: 302-739-5661

Please complete this “PLUS application in its entirety. **All questions must be answered. If a question is unknown at this time or not applicable, please explain.** Unanswered questions on this form could lead to delays in scheduling your review. This form will enable the state staff to review the project before the scheduled meeting and to have beneficial information available for the applicant and/or developer at the time of review. If you need assistance or clarification, please call the State Planning Office at (302) 739-3090. Possible resources for completing the required information are as follows:

www.stateplanning.delaware.gov/

www.firstmap.delaware.gov/

www.dnrec.state.de.us

www.dda.delaware.gov

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Name of Municipality:	
Address:	Contact Person:
	Phone Number:
	Fax Number:
	E-mail Address:

Date of Most Recently Certified Comprehensive Plan: _____

Information prepared by:	
Address:	Contact Person:
	Phone Number:
	Fax Number:
	E-mail Address:

Maps Prepared by:	
Address:	Contact Person:
	Phone Number:
	Fax Number:
	E-mail Address:

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General Plan Approval Process

- Step 1:** Draft prepared by local government.
- Step 2:** Planning Commission and/or Legislative Body approves to send to PLUS at the time the plan is released for public review.
- Step 3:** PLUS meeting, application submitted by 1st business day of the month for that month's meeting.
- Step 4:** State comments submitted to local government within 20 business days of meeting.
- Step 5:** Local government replies to state comments in writing and submits revised plan to Office of State Planning Coordination (O S P C) for review.
- Step 6:** OSPC requires 20 working days to reply to revised plan. State sends a letter accepting changes or noting discussion items.
- Step 7:** Once you receive the Office of State Planning Coordination letter stating that all certification items have been addressed, your Planning Commission and Council should adopt the plan pending State certification. We strongly recommend that your Council adopt the plan by ordinance. The ordinance should be written so that the plan will go into effect upon receipt of the certification letter from the Governor.
- Step 8:** Send our office a copy of the ordinance (or other documentation) that formally adopts your plan along with an electronic or paper copy of the final plan. We will forward these materials to the Governor for consideration. At the discretion of the Governor a certification letter will be issued to your town. The plan is effective on the date of adoption.
- Step 9:** Once you receive your certification letter, please forward two (2) bound paper copies and one electronic copy of your plan to our office for our records. It is suggested that you incorporate a copy of the State's PLUS letter and the Governor's certification letter into the final comprehensive plan document.

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Comprehensive Plan / Amendment Checklist¹

Please check yes or no as to whether the following information has or has not been included in the comprehensive plan and indicate page numbers where information may be found.

Public Participation	Yes	No	Page # / Sections
Public Participation Summary and Results			

Population Data and Analysis	Yes	No	Page #
Past Population Trends			
Population Projections			
Demographics			
Position on Population Growth			

Housing	Yes	No	Page #
Housing Stock Inventory			
Housing Pipeline			
Housing Needs Analysis			
Position on Housing Growth			
Affordable Housing Plan			

Annexation	Yes	No	Page #
Analysis of Surrounding Land Uses			
Annexation Plan			

Redevelopment Potential	Yes	No	Page #
Identification of Redevelopment Areas and Issues			
Redevelopment Strategy			
Community Development Strategy			

¹ Please go to the following website for detailed checklist information:
<http://www.state.de.us/planning/services/circuit.shtml>.

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Community Character	Yes	No	Page #
History of the Town or City			
Physical Conditions			
Significant Natural Features			
Community Character			
Historic and Cultural Resources Plan			
Community Design Plan			
Environmental Protection Plan			

Land Use Plan	Yes	No	Page #
Existing Land Use			
Land Use Plan			

Critical Community Development and Infrastructure Issues	Yes	No	Page #
Review of Community Conditions			
Inventory of Community Infrastructure			
Inventory and Analysis of Community Services			
Water and Wastewater Plan			
Transportation Plan			
Community Development Plan			
Community Facilities Plan			

Intergovernmental Coordination	Yes	No	Page #
Description of Intergovernmental Relationships			
Intergovernmental Coordination Strategy			
Analysis and Comparison of Other Relevant Planning Documents			

Economic Conditions	Yes	No	Page #
Economic Base / Major Employers			
Labor Market			
Income and Poverty			
Economic Development Plan			

Open Space and Recreation	Yes	No	Page #
Inventory of Open Space and Recreation Facilities			
Open Space and Recreation Plan			

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Implementation Strategies	Yes	No	Page #
Evaluation of Current Codes and Ordinances			
Zoning Map Revisions			
Zoning and Subdivision Code Revisions			
Implementation Plan			
Coordination with Other Government Agencies			

Other State Programs, Policies, and Issues	Yes	No	Page #
Total Maximum Daily Loads			
Corridor Capacity Preservation Program			
Agricultural Preservation Program			
Sourcewater Protection			

Additional Comments:

Summary:
