



STATE OF DELAWARE
EXECUTIVE DEPARTMENT
OFFICE OF STATE PLANNING COORDINATION

January 22, 2018

Debbie Botchie
Town of Millville
36404 Club House Road
Millville, DE 19967

RE: PLUS review 2017-12-04; Town of Millville Comprehensive Plan Pre-Update

Dear Debbie:

Thank you for meeting with State agency planners on December 20, 2017 to discuss the Pre-PLUS review of the Town of Millville's Comprehensive plan. State agencies have reviewed the documents submitted and offer the following comments. We hope that these comments and recommendations assist the Town as the Plan update is being prepared. Additionally, these comments reflect only issues that are the responsibility of the agencies represented at the meeting.

Office of State Planning Coordination – Contact Dorothy Morris 302-739-3090

Thank you for submitting your current plan for Pre-update PLUS review. We look forward to working with the town as you update your current plan. Our role in your update is to provide assistance such as coordinating meetings between the town and State agencies, assistance, if needed with demographics and/or mapping and guiding the town through the certification process.

According to our records your current plan was certified on February 10, 2009 which means your update should be complete no later than February 10, 2019. If for any reason the town does not feel they can meet this deadline, you may file an extension by forwarding an official request to the Cabinet Committee on State Planning Issues at least 90 days prior to the deadline.

- According to the American Community Survey through the United States Census Bureau, the Town of Millville estimated population in 2015 is approximately 602 people. Therefore, the town must meet the comprehensive requirements for communities under 2000 persons. With that said, however, I urge the town to work with your consultant and

coordinate with State agencies to consider the additional comprehensive plan elements that may relate to the Town because of your location near Environmentally Sensitive Areas. The Office of State Planning Coordination has developed a Comprehensive Plan Checklist based on the requirements found in Title 22, § 702 of Delaware Code and guidelines which also suggests a number of recommended plan elements as requested by State agencies. The checklist can be downloaded from our website here: <http://stateplanning.delaware.gov/docs/comprehensive-plan-checklist-guide.pdf>.

Please feel free to contact Dorothy Morris of this office if you need anything as you move forward with your update. She will be happy to help the town coordinate with our office and other State agencies to answer any questions or concerns relating to the requirements and/or recommendations.

Department of Transportation – Contact Bill Brockenbrough 760-2109

- When its 2008 Comprehensive Plan was prepared, the developed part of the Town was a relatively small community centered along Atlantic Avenue (Delaware Route 26). However, when Millville by the Sea and Barrington Park are fully developed, the Town will be much larger and centered south of Burbage Road (Sussex Road 353), with the “old town” area located on its north edge. While the Route 26 corridor should not be neglected, DelDOT recommends that the Town focus on its efforts in the new plan on guiding development in the remainder of the Town, which will be taking shape over the next decade.

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

Water Infrastructure (p. 30)

- In this section, DNREC would expect to see a discussion of the Town’s current source of water supply, what protections the Town has in place to protect that water supply, and

what the Town's plans are for future water supply. Does the Town have the capacity/allocation, in terms of water supply, to accommodate any future growth and development?

Source Water Protection

- DNREC's review found wellhead protection and excellent ground-water recharge potential areas within the Town's municipal boundaries. These wellhead protection areas are for public water systems as defined by the Source Water Assessment and Protection Program.
- Text of the comprehensive plan may include description of source water requirements in 7 Del. C. 6082(c), 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 22 of the Delaware Code.
- A map of source water resources (excellent recharge areas, wellhead protection areas) may be included in the plan. This map must be derived from the most current datasets¹ provided by the Department of Natural Resources and Environmental Control (DNREC).
- If included, 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 datasets¹.
- The local government may adopt, after consultation with DNREC, an ordinance that is protective of the resource. If adopted, 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>

Wastewater Infrastructure (pp. 30-31)

- In this section, DNEC would expect to see a discussion of the Town's current source of wastewater treatment and what the Town's plans are for future wastewater treatment. Does the Town of Millville's collection and conveyance system have the capacity to accommodate any future growth and development? Does the Sussex County wastewater treatment system have the capacity? These are good issues to explore as part of the intergovernmental coordination that is required when developing your comprehensive plan.

Stormwater Management (pp. 32-33)

- The Department recommends that the Town of Millville incorporate a requirement for a stormwater review into the Town's 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:

1. Submit a Stormwater Assessment Study for the project limits of disturbance and hold a project application meeting with the reviewing delegated agency,
2. Submit stormwater calculations, and
3. Submit construction drawings

Following the project application meeting, a Stormwater Assessment Report will be completed by the reviewing agency and the developer and forwarded to the Town. 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 Town consider the ratings from the Stormwater Assessment Report in making a decision to issue preliminary approval for any development request. Further, the Sediment and Stormwater Program recommends that the Town incorporate the Stormwater Assessment Report as a required element when a plan is submitted to the Town's 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 Town. 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.

Open Space and Recreation Facilities (pp. 41-43)

- 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 Millville is located within SCORP Planning Region 5.

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 5 (Eastern Sussex County), 65% 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 Region 5 include:

High facility needs:

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

Moderate facility needs:

- Hiking Trails
- Boat Access
- Canoe/Kayak Launches
- Camping Areas
- Ball Fields
- Football Fields
- Public Golf Courses
- Soccer Fields
- Tennis Courts

Environmental Protection (pp 43-44)

- The Town can remove the last two sentences of the second paragraph on page 43, beginning with “The community is committed...,” which references House Resolution 24 under the 144th General Assembly.

Please eliminate the third paragraph on page 43, which references State Resource Areas (SRAs).

The discussion about wellhead protection areas should be moved to the section on Water Infrastructure.

Floodplains (pp. 43-44).

- The Town's floodplain boundaries were revised by FEMA on March 2, 2015. FEMA delineates the boundary of 1% annual chance flood events on their Flood Insurance Rate Maps. These floodplain boundaries are used for flood insurance and floodplain management purposes. The purpose of the maps is to depict areas at risk of flooding and to aid in developing mitigation strategies to keep development and people out of harm's way. This new data needs to be reflected in an updated map.

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 your 2008 Comprehensive Plan more resources are available for the Town of Millville 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. <https://governor.delaware.gov/wp-content/uploads/sites/24/2016/12/EO041.pdf>

Determination of Future Sea-Level Rise Planning Scenarios for Delaware

The Delaware Geological Survey has released its Recommendations for of Sea-Level Rise Planning Scenarios for Delaware: Technical Report, (November 2017). It found that “Low-lying areas will likely experience more frequent shallow tidal flooding. Sea-level rise also amplifies the risks of flooding and damage to property, natural habitats, and infrastructure from storms that bring heavy rain, waves and/or storm surge. Over time, sea-level rise will expand the federally regulated floodplain under the National Flood Insurance Program (NFIP).”

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

Resilient Community Partnership

The Delaware Coastal Programs (DCP) “Resilient Community Partnership” program intends 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.

If you have questions or would like additional information about the partnership, please contact the Delaware Coastal Programs at (302) 739-9283. For additional information about financial assistance programs that support the implementation of resiliency-building plans and projects, please see the Delaware Database for Funding Resilient Communities at

<https://www.sppa.udel.edu/research-public-service/ddfrc>.

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.

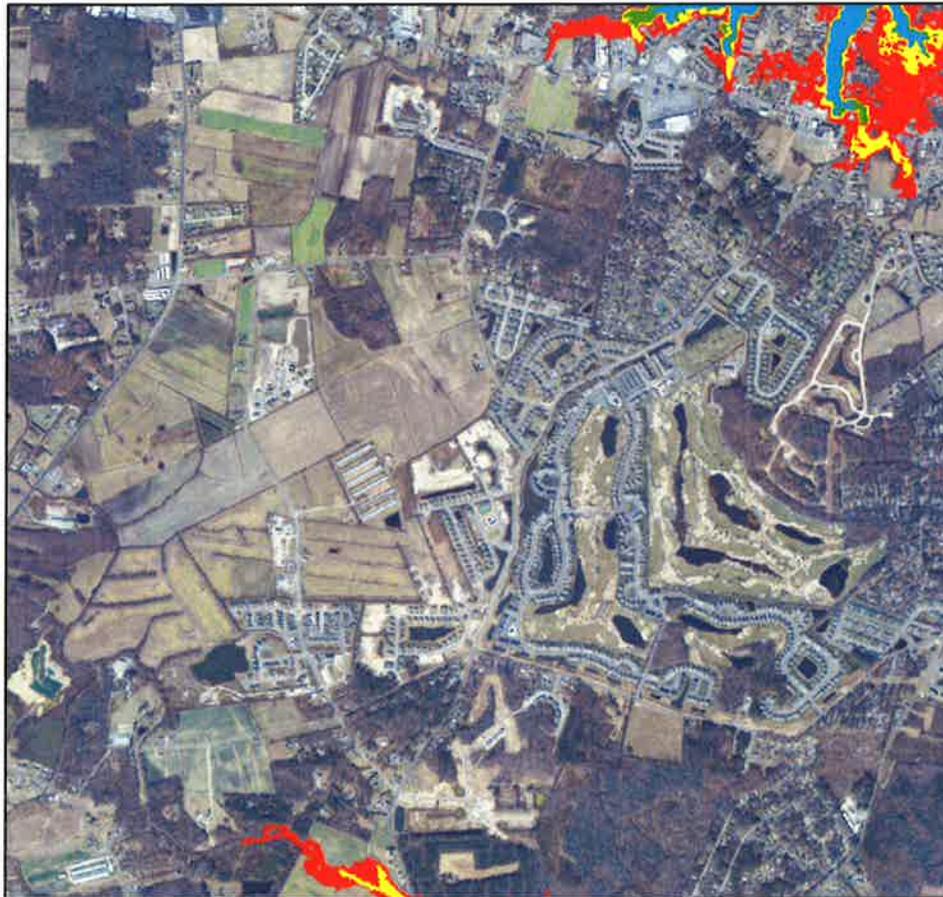
For more information, please contact Kelly Valencik, the Coastal Training Program Coordinator at kelly.valencik@state.de.us or (302) 739-6377.

Sea Level Rise Inundation Maps

Portions of the Town of Millville 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).

Millville PLUS 2017-12-04



Legend

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

0 0.2 0.4 0.8 Miles



This map is produced by the Delaware Coastal Programs for planning purposes and effective coastal management. It is not intended for regulatory authority, jurisdiction or territorial claims.

Recommendations:

1. The Town of Millville 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 of Millville 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 of Millville 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.

References:

NOAA (National Oceanic and Atmospheric Administration). (2014). Mean Sea Level Trend, Lewes, DE. Retrieved from

http://tidesandcurrents.noaa.gov/sltrends/sltrends_station.shtml?stnid=8557380.

DNREC Delaware Coastal Programs. (2012). Preparing for Tomorrow's High Tide: Sea Level Rise Vulnerability Assessment for the State of Delaware. Dover, DE: Department of Natural Resources and Environmental Control. Retrieved from

<http://www.dnrec.delaware.gov/coastal/Pages/DESLRAdvisorycommittee.aspx>

Recycling

- 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 (including multi-family settings). Municipalities that provide trash and recycling services can demonstrate some of the lowest prices in Delaware. Municipalities should plan for outreach/educational strategies for constituents, as well as continued implementation.

Delaware Law (7 Del. C. §6053) and Regulations (7 Del. Admin. C. §1305) specify that the 'commercial sector' shall participate in a comprehensive recycling program. As such, all those involved with the planning of the commercial sector should give consideration to space for collection of recyclables that would be typically generated. For example, space for a recycling dumpster should be provided adjacent to each trash dumpster. The commercial sector includes all for-profit, not-for-profit, institutional, charitable, educational, health care, and government organizations.

For more information or assistance related to recycling requirements, benefits, tools, and assistance, please call 302-739-9403.

Air Quality

- According to the comprehensive plan, “the median age of Millville residents is 41.5 years old and 18.5% of the population is under the age of 18 with 18.9% being over the age of 65” (page 7). Sensitive groups, including those aged 5 and younger, the elderly and those with pre-existing cardiopulmonary conditions such as emphysema, asthma and COPD are at an increased risk of the negative effects of air pollution. One particular pollutant of concern is PM 2.5 or particulate matter. Particulate matter comes in two sizes, PM 10 (which is 10 microns in diameter and has the ability to become embedded in the lining of the lungs,) and PM 2.5 which is small enough to be absorbed into the bloodstream.

Another transportation problem that was addressed in the comprehensive plan was the issue of traffic congestion along Millville’s primary route through town, Atlantic Avenue (Route 26) especially during seasonal traffic periods during the summer beach season (page 26). DNREC is in support of the Town of Millville’s vision statement for a “more connected, pedestrian-oriented and livable community” (page 1) and DNREC supports the Town of Millville’s future goal of adding a beach bus or trolley system through town or to provide transit access to Millville’s elderly and senior populations. DNREC encourages the expansion of alternative transportation opportunities that limit the impact of vehicular travel and facilitate the switch from vehicular travel to other more environmentally friendly modes.

Millville is encouraged to continue to find creative ways to both preserve the town’s unique small-town charm while also adapting to a changing land use and public planning environment. Examples of such enhancements would include the maintenance and construction of needed sidewalk and pedestrian network improvements, creative and innovative solutions to mitigate traffic problems in the area and also the addition of more mixed use development. Such mixed use development would include alternative development types that are not limited to single family detached homes and cater to a more diverse population such as the development mentioned on page 5 concerning the “Millville by the Sea” mixed use development. Currently, 132 of 149 housing units located in the Town of Millville (collectively 89% of all housing units available) are single-family detached housing (page 5).

The Town of Millville is also encouraged to add electric vehicle supply equipment (EVSE) and charging where feasible in common areas to accommodate cleaner vehicular transportation through the area. For more information about the various electric charging options and where they are best deployed, please see <https://www.chevyevlife.com/bolt-ev-charging-guide/>.

Should the applicant have any more questions or concerns, the Division of Air Quality (DAQ) point of contact is Lauren DeVore, and she may be reached at (302) 739-9437 or lauren.devore@state.de.us.

Recommendations for Ordinances and Plan Implementation

Wetlands Delineations:

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.

Stormwater Utility:

Recommendation: Explore the feasibility of a 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 Sussex County, the Sussex Conservation District, and the Delaware Clean Water Advisory Council as partners in funding stormwater retrofits.

Drainage Easements:

Recommendation: The Town should pursue drainage easements along waterways and storm drains where currently there is none.

State Historic Preservation Office – Contact: Terrence Burns 302-736-7404

- The Town of Millville provides a comprehensive list of the identified historic properties within their current boundaries or in areas that could be annexed, as SHPO suggested for their last plan; they are encouraged that the Town pursued this and has a better understanding of their remaining properties. The SHPO applauds their goal of seeking National Register-listing for the eligible properties, and will be happy to discuss ways to protect their historic properties in the future, including the potential for becoming a Certified Local Government. This program strengthens preservation efforts by providing technical and financial assistance, while encouraging preservation programs and practices. (As part of the nationwide CLG Program, Delaware's CLG Program is

administered by the Delaware State Historic Preservation Office, in partnership with the National Park Service).

- One of the main goals in the current statewide historic preservation plan, Preserving Our Past for a Better Future, is to encourage active participation in historic preservation by all local governments. We are currently updating the statewide historic preservation plan and welcome the City's comments and suggestions for inclusion in the new statewide plan. We will also be happy to provide technical assistance for the town's upcoming revisions. The Delaware's Historic Preservation Plan is available online at:
<http://history.delaware.gov/pdfs/Preservation%20Plan%202013-2017.pdf>.

State Housing Authority – Contact: Karen Horton 739-4263

- Local governments have a crucial role in facilitating affordable housing as they have primary control over land use and housing-related decisions and can enact policies that either encourage or discourage affordable housing. At a time when Federal resources for housing are diminishing, the Town of Millville's role is especially critical given the substantially documented need for affordable housing within the coastal resort region. 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>
 - 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:

- Review how ‘family’ is defined and remove undue restrictions on group homes.
- Review for and repeal crime-free or nuisance abatement ordinances that often require the attachment of a lease addendum. These ordinances can have the effect of subjecting tenants to eviction for a broad range of offenses and presents concerns such as silencing victims who need emergency aid, as well as, increasing housing instability for vulnerable populations.
- 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 Millville 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.

Department of Agriculture – Contact: Scott Blaier 698-4532

- Page 44 discusses tree planting and “Tree City” certification. Please contact the Department of Agriculture’s Urban Forestry program for assistance in achieving the town’s urban forestry and tree canopy goals (Kesha Braunskill (302) 698-4578).

Sussex County Engineering – Contact: Rob Davis 855-7820

- Sussex County operates the wastewater system that serves the incorporated area of Millville and an additional surrounding area. The County completed a planning study update in 2005 that addresses current and future sewer service in the South Coastal Area that includes Millville. The update has identified certain future upgrades to existing infrastructure that is required. The update was based on assumptions in Millville of a minimum residential lot size of 7000 square feet (maximum 6.22 dwelling units per acre) in residential areas and a maximum of 6.67 equivalent dwelling units per acre in commercial zoned areas and undeveloped area up to 650 feet north and south of Route 26. Other unincorporated areas beyond Millville are assumed to develop at a maximum of 4.0 EDU per acre. In order to minimize additional sewer system upgrades, the land use plan should not exceed those assumptions. Any changes to uses that are more intense would concern the Engineering Department. Anything that would increase flow should be approved by the Sussex County Engineering Department.

Thank you again for allowing us to review your current plan before you begin your update. If you would like to further discuss any of the regulations or recommendations in this letter, the Office of State Planning would be more than willing to coordinate a meeting between you and the commenting agency. We look forward to working with you on the update and if you need assistance please contact me or Dorothy Morris at 302-739-3090.

Sincerely,

A handwritten signature in cursive script that reads "Constance C. Holland". The signature is written in black ink and is positioned above the printed name.

Constance C. Holland, AICP

Director, Office of State Planning Coordination

CC: Debbie Pfeil KCI Technologies, Inc.