



ENVIRONMENTAL CONSULTANTS INTERNATIONAL CORPORATION

ENGINEERING
PLANNING
SURVEYING

220 Rehoboth Avenue
P.O. Box 820
Rehoboth Beach, Delaware
19971
(302) 226-2844
(800) 403-4749
Fax (302) 226-2939
E-mail: ecl@ecleng.com

One East Uwchlan Avenue
Suite 116
Exton, Pennsylvania
19341
(610) 624-2440
(888) 804-2440
Fax (610) 624-2462
E-mail: eclpa@ecleng.com

552 Atlantic Avenue
Millville, Delaware
19967
(302) 537-8555
Fax (302) 537-8556
E-mail: eclde2@ecleng.com

www.ecleng.com

November 21, 2006

Ms. Constance C. Holland, AICP
Director
The State of Delaware
Office of State Planning
122 William Penn Street, 3rd Floor
Dover, DE 19901

**RE: DICKENSON GROVE SUBDIVISION
PLUS NO. 2006-07-07
ECI PROJECT NO. 06-015**

Dear Ms. Holland:

Thank you for the opportunity to showcase our Dickenson Grove project to your committee. In response to your letter of August 22, 2006, we offer the following comments:

STATE STRATEGIES/PROJECT LOCATION

We understand that this project is located in an Investment Level 3, according to the Delaware Strategies for State Policies and Spending. We further recognize that the project is located within a Kent County Growth Zone. We welcome the support of the Planning Office with regard to this project. It is our intention to develop the site to enhance existing environmental conditions as they currently exist on the property. The revised plan prepared for the project will compliment the significant environmental attributes of the site. Dickenson Grove will be developed as an asset to the community.

STREET DESIGN & TRANSPORTATION

We understand that Roesville Road was recently classified by DeIDOT as a collector road. As part of the plan for Dickenson Grove, it will be the intention of the developer to dedicate, on his side of the roadway, the necessary additional land to reflect a minimum right of way of 40' from the centerline of Roesville Road. In addition, along the frontage of the site, the developer will provide, where possible, a 10' wide shared use path, to be located within a 15' wide permanent easement, parallel and adjacent to the frontage of the project site.

Ms. Constance C. Holland, AICP
Director
The State of Delaware
Office of State Planning
November 21, 2006
Page 2

The developer recognizes the recommendation by DeIDOT to not require a traffic impact study (TIS) for this project. The developer is cognizant of their responsibility regarding participation in road improvements that are directly impacted by the development of Dickenson Grove. As part of the off-site improvements, to be provided by the developer, in accordance with the DeIDOT review, Lessard Roesville Property, LLC will agree to improve Roesville Road similar to what the developers of Roesville Estates and/or Old Corsey Mill provide in the way of improvements along the Roesville Road. The engineer of record for Dickenson Grove will utilize DeIDOT standard typical sections for the improvement along the frontage of Roesville Road, adjacent to the Dickenson Grove project site and will coordinate roadway improvements with DeIDOT.

It is recognized that the entrance to the project site was not submitted at the time of PLUS review. After in-depth discussion with DeIDOT and the Kent County Planners, an entrance has been placed, to service the Dickenson Grove Subdivision, approximately 140' west of the proposed entrance to Roesville Estates. This location has been agreed upon by DeIDOT and the Kent County Planners.

With regard to the location of stub streets to adjacent subdivisions located along the northern boundary of Dickenson Grove, ECI has coordinated stub streets that tie directly into the proposed subdivision known as Wetherstone Crossing, and has coordinated a stub street with McCrone Associates, the engineer for Rayfield Point. The plans, as presented, reflect the stub street locations or the actual connections to the adjoining subdivisions.

With regard to cul-de-sac streets, the cul-de-sac, located on the west side of the project, originally depicted upon the PLUS plan has been eliminated in direct accordance with the DeIDOT suggestion. In addition, the major four-way intersection immediately north of the project entrance has, at DeIDOT's suggestion, been converted to a round-about. With regard to the Y-shaped intersection, the plan, as designed, eliminates the Y intersection.

Also not incorporated into the DeIDOT PLUS comments, the Dickenson Grove project has now been incorporated into the North Frederica Recoupment Agreement Group that will provide funding to allow the North Frederica Interchange to be constructed as part of a future improvement plan by DeIDOT. This group of developers have agreed to cooperate with DeIDOT, in terms of funding the State's portion of the funding necessary to forward the ultimate construction of the intersection.

NATURAL AND CULTURAL RESOURCES

The developer recognizes the importance of the wetlands and wetland buffers, as they occur on the Dickenson Grove site. It is the intention of the developer to fully respect the wetlands and to provide buffers and comprehensive stormwater management so as to not impact the wetlands, as they currently exist. With regard to the sixteen (16) development applications along the

Ms. Constance C. Holland, AICP
Director
The State of Delaware
Office of State Planning
November 21, 2006
Page 3

Murderkill, the developer cannot control what other individual may do or not do with their property. In response to the specific site recommendations provided within the PLUS review, we offer the following.

The applicant is in the process of developing an agricultural tree harvest for many of the areas currently in woodlands within the project boundary. Obviously, the development of lands within woodlands is a concern to the developer. The developer fully intends to respect tree lines and woodlots that are remaining at the time of development and after the agricultural tree harvest. The stormwater management system, including necessary stormwater management ponds, will be designed to minimize impact to woodlands as they exist on the project. Tree removal and forestry operations will be restricted during the period of April 1 to July 31, so as to reduce impact on wildlife. With regard to wetland buffers, the developer has provided buffers in direct accordance with applicable regulations and good planning. If one considers the rear yard setbacks and buffers provided on the plan, the effective wetland buffer averages a minimum distance of over 50' in most areas, far in excess of the mandated 25'. In many areas the effective buffer exceeds 100'. Sedimentary runoff associated with land development and large scale earthwork is significantly minimized by the existing controls associated with soil erosion, sedimentation control plans that are mandated by the Kent County Conservation District. With regard to location of wetlands, a wetland delineation has been performed by Mr. Ed Launay, a certified wetland biologist. At present, the information obtained as a result of the wetland field work, is being prepared and forwarded to the United States Army Corps of Engineers for issuance of a Jurisdictional Delineation. With regard to wetland crossings, there is one crossing associated with the development of this project. It will be the intention of the developer to minimize any impacts to wetlands at the proposed crossing, which has been located at the most narrow point of the delineated wetlands. It is entirely possible that this crossing will not require a site specific permit, but will be able to avail itself of the current Nationwide permit in effect for Kent County.

With regard to impervious cover, it is the intention of the developer of Dickenson Grove to minimize the construction of impervious features on site. Obviously, simply the development of land results in an increase in impervious cover; however, this issue will be considered during the development of the project site.

With regard to TMDL's, please be aware that the wastewater needs for this project will be addressed via connections to the existing Kent County Public Works sanitary sewer system. Based upon the existing use of the Dickenson Grove site, it is anticipated that a reduction in TMDL's will be the result when the development is undertaken.

Ms. Constance C. Holland, AICP
Director
The State of Delaware
Office of State Planning
November 21, 2006
Page 4

DEPARTMENT OF NATURAL RESOURCES & ENVIRONMENTAL CONTROL

Soils

ECI, the engineer of record for this project, is aware of the various soil types associated with the Dickenson Grove project. The well-drained soils to include Sassafras and Mumford Series soils are well-drained and generally have little to no limitation for land development activities. The Woodstown class of soils is moderately well-drained and has some limitations associated with land development activities. The hydric soils that exist on site include Elkton and Falsington that are, by association, poorly drained, normally wetland associated soils. The current plan for Dickenson Grove respects those areas and limits or prohibits land development activities within the areas containing these soils.

Water Supply

As depicted on our application, it is anticipated that this project will utilize the proposed waterline, to be constructed by Artesian Water Company, for the supply of potable water and fire protection at this project. At present, we do not anticipate the need to drill a potable water supply well. With regard to dewatering, should that be necessary, the developer is aware of the restrictions and need to obtain permits from the Department.

Soil Erosion Sedimentation Control Stormwater Management

The developer and his engineer are well versed in the requirements for stormwater management and the control of sediment and erosion on development sites. The notes referenced within the PLUS correspondence will be addressed on the final plan of record and a clear statement defining the maintenance requirements for stormwater management facilities will be clearly depicted on the plan. The eight issues made a part of the PLUS correspondence will be specifically referenced and make a part of the final plans prepared for the project. It will be the intention of ECI to have a pre-application meeting with the Kent County Soil Conservation District to discuss, in depth, the stormwater management practices to be employed on this project, along with how soil erosion and sedimentation control will be affected.

Drainage

Issues brought forth in this section of the correspondence will be fully addressed in our future submittals to the Kent County Conservation District. ECI recognizes the importance of maintaining the normal flow of drainage, upstream of the project through the project. Under no circumstances will the project impede normal flow of stormwater throughout the project. As discussed elsewhere within this correspondence, the final design of the project will include extensive measures to address stormwater runoff and associated nutrient loads.

Ms. Constance C. Holland, AICP
Director
The State of Delaware
Office of State Planning
November 21, 2006
Page 5

Floodplains

This site is located on the FEMA Flood Insurance Rate Map as Zone X, which is outside of the flood plane in total.

Forest Preservation

The tree lines that were referenced on the PLUS review may have already been subject to an agricultural tree harvest, as referenced elsewhere within this correspondence. The agricultural tree harvest is or has been performed in a manner consistent with appropriate forestry practices. The remaining woodlands, as they exist, will be respected and areas of open space that lend itself to reforestation will be reforested as part of the project scope. Areas that are not reforested or not appropriate for reforestation will be graded in a manner consistent with a residential development providing appropriate landscaping that will compliment the overall project site and further mitigate stormwater run-off issues.

Open Space

The Dickenson Gove project reserves over 43% of the project site as open space. A review of the plan indicates that substantial amounts of open space are included around the entire perimeter of the project and large open space recreation areas are included throughout the project. In addition to dedicated open space, numerous recreational opportunities exist on site to include tot-lots, a community center with tennis courts and a swimming pool and a pedestrian trail system.

Site Visit Request

The developer recognizes the DNREC request for a site visit. Please be advised that the developer will authorize a site visit for any PLUS associated review agency upon written request to the developer of record. The developer encourages agency site specific review and will be timely in authorizing site visits generally within one week of receipt of a written request.

Rare Specimens

ECI has conducted a search of the rare endangered species listings for this project site. The results of our investigations indicate that within the project boundaries here are no known species that are rare or endangered on site.

Recreation

Significant passive and active recreation areas are provided by this plan. Sidewalks along both sides of the street are proposed, along with extensive interconnected walking trails for exercise, including trails throughout the center court yard of the project. Opportunities for recreation will include work-out stations along a trail network, tot-lots, a community center, tennis court, a

Ms. Constance C. Holland, AICP
Director
The State of Delaware
Office of State Planning
November 21, 2006
Page 6

swimming pool and other site amenities that will allow both active and passive recreational pursuits.

Underground Storage Tanks

Based upon the Phase I Environmental Site Assessment, conducted by ECI, there are no underground storage tanks located on the project site.

Solid Waste

Dickenson Grove, like any other land development project, will generate solid waste. It is the intention of the developer to arrange for central pick-up of solid waste by a reputable solid waste hauler and disposal at appropriate solid waste disposal sites, located within the state of Delaware. As part of the Home Owners Association, the developer will encourage recycling by the residents by delineating off site State sponsored areas where recycling activities can be conducted.

Air Quality

This issue is an issue that the developer will address via the utilization of Energy Star appliances. Typically, energy conservation issues addresses as a part of the Dickenson Grove project will include Energy Star appliances, increased insulation, high performance windows, upgraded heating and air conditioning systems, and efficient water heating facilities.

STATE FIRE MARSHAL'S OFFICE

ECI is aware of the rules and regulations as promulgated by the State Fire Marshal's Office. It is the intention of the developer and ECI to fully comply with these issues and to file appropriate plans for review by the State Fire Marshal's Office, as the plan advances. With regard to gas piping, at present there are no plans within the Dickenson Grove project, to provide a central gas system. If however, a gas utility elects to construct a distribution system, the developer may pursue the option of obtaining gas service for this project. Should that be the case, the construction of gas piping, through the residential units, will be in direct conformance with all applicable fire protection standards.

With regard to plan notes, the plans will be annotated with the notes made a part of the Fire Marshal comments.

DEPARTMENT OF AGRICULTURE

The developer welcomes the Notice of No Objection by the Department of Agriculture and the Delaware Forest Service. As mentioned elsewhere in this document, efforts to mitigate the loss of woodlands will be taken, and preservation of wetland corridors will be made a part of the

Ms. Constance C. Holland, AICP
Director
The State of Delaware
Office of State Planning
November 21, 2006
Page 7

overall plan. The developer is aware of Agriculture Use protections currently in place with the state of Delaware and will comply with the notice requirements to notify future residents of the project, of the sites location within the Agricultural District. With regard to right tree for right place, native landscape, and tree mitigation, it will the intention of the developer to provide extensive landscaping, preserve woodlands where possible, and utilize natural landscapes in the development of this project.

PUBLIC SERVICE COMMISSION

With regard to public water supply, discussions with Artesian are ensuing. At present, Artesian has committed to provide public water supply to the project.

DELAWARE STATE HOUSING AUTHORITY

The developer recognizes the demographics associated with incomes and medium home costs within the Kent County geographic area. The developer will utilize this information as a part of his marketing scheme, to position this project in a market that will be compatible with the market participants.

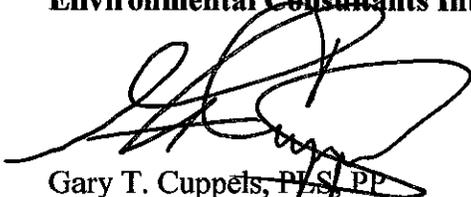
DEPARTMENT OF EDUCATION

The developer of record for the Dickenson Grove project has corresponded with the Lake Forest School District Superintendent, Dr. Daniel Curry, in the past. Based upon recent discussion with the superintendent, it is the position of the Lake Forest School District to remain neutral with regard to land development projects within its school district. The basis for this posture is the recently enacted Kent County impact fee that provides school districts with funds necessary to expand facilities as development expands within the school district.

I hope that the responses contained within this correspondence will adequately address the concerns of the agencies reviewing this project. Should you have any questions or concerns related to these responses and the project in total, please feel free to contact me directly.

Very truly yours,

Environmental Consultants International Corporation



Gary T. Cuppels, P.E., P.S., P.P.
President