

February 18, 2008

State of Delaware
Executive Department Office of
State Planning Commission
540 South DuPont Highway
Thomas Collins Building, Third Floor
Dover, Delaware, 19901

Attn: Ms. Constance C. Holland, AICP
Director

Re: PLUS Review – PLUS 2007-06-01; Blades Development

Dear Ms. Holland:

Thank you for the opportunity to meet with State agency planners to discuss the proposed plans for the Blades Development project. This following is our response to the PLUS Review comments dated July 18, 2007:

Office of State Planning Coordination – Contact: Bryan Hall 739-3090

We are pleased to hear that the OSPC has no objections to the development and that we are in accordance with the Certified Comprehensive Plan for the Town of Blades. We have continued our efforts with DNREC and our environmental consultant to meet the standards for Brownfield Redevelopment Remedial Action Completion and have received the Certificate of Completion of Remedy for the property.

Division of Historical and Cultural Affairs – Contact: Alice Guerrant 739-5685

Pursuant to the PLUS comments, we have invited the Division of Historical & Cultural Affairs – State Historic Preservation Office to investigate the parcel for any archaeological sites.

Department of Transportation – Contact: Bill Brockenbrough 760-2109

We have been working with various DelDOT officials including Derek Sapp, Bill Brockenbrough, John Fiori , Mark Coté, and Ted Bishop to meet their goals for the project and respond to their concerns. The following numbered responses correspond to the DelDOT PLUS review comments for the project:

- 1) DelDOT has granted the proposed 10' right-of-way dedication along River Road and Market Street per the June 2007 Record Plan and corresponding Letter of No Objection dated September 28, 2007.
- 2) After meeting with Del/DOT on August 16, 2007, we responded to their letter dated September 13, 2007 concerning the Record Plan and resubmitted for the Letter of No Objection. Highway Entrance Plans, which include a full overlay of the entire road frontage and the full intersections of 6th Street, Market Street, and River Road have been submitted to Del/DOT for their review.
- 3) Sidewalks are shown per the June 2007 Record Plan and corresponding Letter of No Objection.
- 4) We will include opaque barriers and or landscape buffers per the Town of Blades requirements.
- 5) A turning template has been applied to the plan to make certain that the proposed parking areas are accessible.

Department of Natural Resources and Environmental Control – Contact: Kevin Coyle 739-3091

Soils

We have taken soil permeability into account as the site design progresses.

Impervious Cover

Based on our most current calculations and projected structure footprints, we believe a surface imperviousness of between 50-55% will be achieved. Stormwater BMP's (best management practices) will be employed to manage rainfall runoff.

ERES Waters

We will strive to reduce the pollutant impact to the adjacent designated ERES waters through the use of stormwater BMPs.

TMDLs

We will strive to meet TMDL standards through the implementation of stormwater BMPs.

Water Resource Protection Areas

We have worked with our engineer and the Town of Blades to keep the impervious cover to a minimum. The number of residences (excluding condominiums) has decreased. This density decrease has helped overcome stormwater management difficulties and also provides approximately 50% impervious cover. The Town of Blades has acknowledged our efforts to control impervious cover to the best of our ability while maintaining the layout of the development that was originally presented.

In addition to controlling impervious cover, we will strive to conserve predevelopment water recharge rates. We will also ensure that the Town of Blades' drinking water supply is not adversely affected by the development being located within the wellhead protection area.

Sediment and Erosion Control/Stormwater Management

We had a pre-application meeting with Sussex County Conservation District and Davis, Bowen & Friedel on August 29, 2007 to discuss storm water management and erosion and sediment control plans. Underground storage units, filter strips, and bioretention facilities were among some of the methods of stormwater management BMP's discussed.

Drainage

- 1) As required by the Sussex County Conservation District we will not exceed pre-developed discharge rates in the storm water management design.
- 2) The applicable drainage easements will be recorded on deeds including any required restrictions.

Hazardous Waste, Solid Waste, Underground Storage Tanks

We have completed a Phase I and Phase II environmental site assessments for the property and completed all necessary remediation to satisfy the DNREC requirements. We have received the Certificate of Completion of Remedy from DNREC which certifies the property is suitable for uses such as residential and commercial.

Air Quality

Energy Star appliances, photovoltaic energy and other emission reducing measures may be considered for the project.

Fire Marshall

We had a preliminary meeting with Davis, Bowen & Friedel and members of the Delaware State Fire Marshals Office on May 9, 2007. We have addressed the concerns discussed at our meeting and the comments from the PLUS review, and Fire Protection Plans have been submitted for review and approval.

Department of Agriculture – Contact: Scott Blaier 698-4500

We will consider the Delaware Department of Agriculture Forest Service's the "Right Tree for the Right Place" concept in our landscape design.

Public Service Commission – Contact: Andrea Maucher 739-4247

We are currently coordinating with Chesapeake Utilities and will adhere to safety guidelines.

Delaware State Housing Authority

We will consider DSHA's recommendation to provide affordable housing for a portion of the units.

Department of Education – Contact: John Marinucci 735-4055

We met with members of the Seaford School District on September 17, 2007 to discuss the project. We will coordinate with our engineer and Sussex County to provide the necessary bus stop shelter.

Sussex County – Contact Richard Kautz 855-7878

The sewer concept plans have been approved by Sussex County Engineering and the construction drawings have been submitted for their review and approval.

Sincerely,



Thomas B. Payne
Blades Development LLC, (member)



David L. Ruff, Mayor
Town of Blades