

September 29, 2016

Ms. Constance C. Holland
Office of State Planning Coordination
122 William Penn Street, Third Floor
Dover, DE 19901

**RE: PLUS 2016-07-03
Town of Little Creek Comprehensive Plan Update**

Dear Ms. Holland:

On behalf of the Town of Little Creek, we are pleased to submit the revised Comprehensive Plan Update and our responses to state agency comments received in the PLUS review letter, dated August 30, 2016. We have carefully considered each comment, and have revised the plan to the greatest extent feasible. Below is an item by item response:

Office of State Planning Coordination

- Action verbs for recommendations were reviewed and revised, where appropriate, to be more attainable. We revised various recommendations sections and Table 18- Implementation Summary (page 83).
- Added more clear and upfront referencing to the Waterfront Redevelopment Plan. See Section 2.2 b (page 31), and Section 2.2 d (page 38).
- Revised language to clarify that the town boundary issue in the Town Charter must be resolved prior to any annexation of land. See Section 1.3 (page 14), and Section 2.2 c (page 32).
- Added language stating that the Comprehensive Plan must be amended prior to any annexation of land within the Area of Concern. See Section 2.2 c (page 34).
- While the suggestions are great, project time and budget constraints limit us from reworking the section as recommended. However, we believe the Implementation Plan is a viable work plan that sets forth a general timeframe and flexible order for implementation. The section points out the key strategies and high priority items to focus on. It also identifies the agencies to coordinate with, potential funding sources, and where to go for more information. In addition, a detailed list is provided for specific zoning and land development ordinance amendments.

Department of Transportation

- Added language to include South Little Creek Road. See Section 2.8 (page 68).

Department of Natural Resources and Environmental Control

- *State Resources Area*
 - Removed language regarding State Resource Areas, but still make recommendation to preserve adjacent land as open space and wetlands. See Section 2.5 a (page 56).

- *Source Water Protection*
 - Revised language to include the City of Dover's wellhead protection area within the Little Creek boundary. See Section 2.6 a (page 61).
 - Revised map to show excellent ground water recharge area, and corrected the language. See Section 2.6 a (page 61) and Map 10.
 - The Comprehensive Plan recommends consulting with DNREC to evaluate the need for a potential source water protection ordinance. See Section 2.6 b (page 64).

- *Flooding and Sea Level Rise*
 - Added citation, as suggested. See Section 2.4 a (page 43)
 - The questionnaire did not decipher if the respondents who believe sea level rise is a minimal concern also support government spending towards adaptation.
 - Properties within the FEMA Zone AE floodplain are at risk of flooding during an extreme storm event. The flood hazards and sea level rise sections are extremely intertwined, with cross referencing between the two.
 - Changed the word "forecasted" to "future potential".
 - Revised language to include the recommendations from the Kent County Hazard Mitigation Plan, and also included the section from the County Plan as an Appendix Item. See Section 2.4 f (pages 51-52) and Appendix D.
 - Revised USACE and risk management language for clarity. See Section 2.4 f (page 53).

- *Wildlife Species and Habitats*
 - Acknowledged.

- *Air Quality*
 - We coordinated with DNREC's Division of Air Quality and the Department of Agriculture to prepare a new Air Quality section. Please see Section 2.5 (pages 57-60).

- *Wetland Delineations*
 - Acknowledged. The Town's Land Development Ordinance addresses these items.

- *Impervious Surface Mitigation Plan, Hydric Soils, Green-technology*
 - Acknowledged. The Comprehensive Plan addresses these items.

- *Stormwater Utility, Drainage Easements*
 - Acknowledged.

State Historic Preservation Office

- Acknowledged.

State Housing Authority

- We appreciate and look forward to the summary resources.



Department of Agriculture

- Acknowledged.

Approval Procedures

- Enclosed please find the revised plan. A public hearing was held on September 14, 2016. The hearing was advertised and a flyer was sent to all property owners inviting residents to the hearing. The flyer, which is attached, also provided an overview of the draft plan, including a summary of the key strategies for sea level rise adaptation and waterfront redevelopment. There were no objections or significant changes that resulted from the hearing and public comment period.

Copies of the draft plan were also sent to the Kent County Department of Planning Services and the Dover/Kent Metropolitan Planning Organization (MPO) for their review. No comments were received; however, representatives from these agencies, as well as other agencies, participated in the public meetings for the preparation of this plan. The public and intergovernmental review process is described in Section 1.5.

On behalf of the Town of Little Creek, we thank you and the agencies for your comments of the draft plan, as well as the guidance and assistance provided throughout the planning process. If you have any questions or additional comments, please contact Mayor Glenn Gauvry or myself.

Sincerely,
AECOM

Ryan Mawhinney, AICP
Senior Planner

Enclosures: Revised Comprehensive Plan Update
Informational Flyer

cc: Glenn Gauvry, Mayor, Town of Little Creek