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March 24, 2006

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**RE: BETHANY WOODS
RESPONSE TO PLUS COMMENTS
ECI PROJECT NO. 04-066**

www.ecieng.com

Dear Ms. Holland:

Thank you for the opportunity to meet with the various State Agency Planners, at your offices on January 25, 2006, to discuss our Bethany Woods project. We have taken the opportunity to review the comments submitted to us via correspondence from your office dated February 10, 2006. As a result of having the opportunity to review those comments, we offer the following responses in a manner consistent with your letter of February 10, 2006.

Office of State Planning Coordination – Ann Marie Townshend 739-3090

We understand that the project is located in the Environmentally Sensitive Developing Area as described in the Sussex County Comprehensive Plan. With that in mind, we have designed the roadway network and the lot configuration to respect the wetlands and have minimal impact on the existing woods. We understand development within the 100-year flood plain and will design the road and lots to positively address this issue.

Division of Historic and Cultural Affairs – Alice Guerrant 739-5685

We acknowledge your comments and agree with your position.

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Department of Transportation – Bill Brockenbrough 760-2109

We will dedicate additional right of way along the frontage of the site to the public use, during the entrance approval process.

A 15 foot permanent easement containing a 10 foot multi-use path along Fred Hudson Road will not be feasible, as the jurisdictional wetlands are in close proximity to the existing right of way line.

We understand the requirement to do a summer-time count for the intersection of Fred Hudson Road and McCoys Way to determine possible entrance improvements. We will discuss this further with DelDOT during the entrance approval process.

As a result of discussion with our client, the Salt Pond and DelDOT, our client has come to an agreement with The Salt Pond development to access the private road (McCoys Way) with our entrance, eliminating any need for a direct access to Fred Hudson Road to serve this project.

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

Design Recommendation

The design of this project meets all regulatory requirements for development of this nature. The wetlands, located on site, have been completely respected. With regard to floodplain, this property, like many properties within the geographic region within the project site, is oriented towards beach-type architecture, which is of low impact and allows for the construction of dwellings that are out of the floodplain and meet the requirements of FEMA.

Soils

With regard to soils, the developer of the Bethany Woods project is aware of the soil conditions on site. The design of the project is directed at providing an effective design for the roadways and dwellings that will address the environmental issues that impact the development in total.

Wetlands

We understand the need to preserve and protect the wetlands within this site. The design of the subdivision keeps all lots out of the jurisdictional wetlands. The wetlands will be marked with Carsonate marks to ensure that residents are aware of the need to avoid these areas and not encroach into the wetland. We do not anticipate needing any wetlands permits for this project. Lot number 19 is connected to the subdivision by a 10' wide driveway from the cul-de-sac to the lot.

The impervious area calculation does not consider roof surface, as we anticipate all homes will be on pilings, which will not affect the amount of pervious area actually on site.

ERES Waters

We will work closely with Sussex Conservation District and will use Best Management Practices (BMP's) in the implementation of the stormwater plan for this project.

TMDL's

The development of the Bethany Woods project will not significantly impact TMDL's within the drainage basin.

Water Supply

Sussex Shores will be supplying public water to this development as stated in your comments. We will abide and obtain all necessary permits for dewatering that may be required during the construction of this subdivision.

Sediment and Erosion Control/Stormwater Management

It is our intention to work closely on this stormwater design with Sussex Conservation District. We intend to use Green Technology (i.e., bioinfiltration swales), within this site. We are anticipating using Super-Silt Fence along wetland boundaries, wherever required. A Certified Construction Reviewer will be engaged during construction activities for this project.

Floodplain

We understand this site is within the floodplain. All roadways and any required stormwater structures will be above the 100-year flood elevation. It is anticipated that all homes will be constructed on pilings, so that first floors and utility connections will be above flood elevation.

Forest Preservation

The PLUS Application forest calculations did not include the forested wetlands. If the forested wetlands are included in the calculation, the total forested area is 11.4± acres. The forest area to be removed to construct the roads and lot clearing issues is 6± acres. The site will be landscaped with native plantings.

Open Space

Open space within this development will remain in its undisturbed state. Most of the open space is wetlands. Stormwater bioswales will be planted and maintained by the Homeowners

Association. We will establish conservation areas for the wetlands/forested areas that will remain undisturbed.

Rare Species

There is no record of endangered species on this site.

Solid Waste

We are aware of the limited space available in Delaware for solid waste disposal. We will make the client aware of your concern and will try to minimize construction waste where possible.

Air Quality

We will encourage the use of Energy Star qualified homes.

State Fire Marshal Office – Duane Fox 856-5298

Roads within the development will be designed to Sussex County and the State Fire Marshal requirements. A Fire Marshal Plan will be submitted to the State Fire Marshal's office for review and approval during the agency submittal process.

Department of Agriculture – Milton Melendez 698-4500

We acknowledge your statement of no objection.

Public Service Commission – Andrea Mauche – 739-4247

At this time, we do not anticipate a closed propane system for this development.

Department of Education – John Marinucci 739-4658

While we do not anticipate this development to generate additional students to the local school district, all roads will be designed to Sussex County and the State Fire Marshal requirements that will ensure school bus access.

Sussex County – Richard Kautz 855-7878

An agreement is in place for this development to access the private road, McCoy's Way, owned by Salt Pond. We will submit a sanitary concept plan to Sussex County Engineering Planning Department prior to submitting construction plans for review.

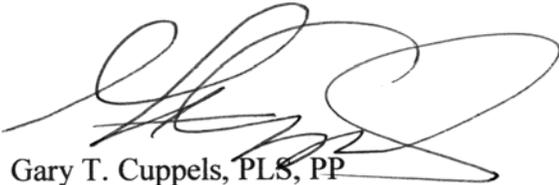
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It is our pleasure to have had the opportunity for your Comprehensive Review. We have endeavored to incorporate the positive comments received at the Planning Session into the development of the preliminary plan for this project. We feel that the plan assures an appropriate level of stewardship for the site and environment. We wish to point out that the development of Bethany Woods is not unlike most coastal developments located along the eastern seaboard. Examples of this development abound the Delaware Coast and in most part reflect an understanding of the environmental implications of developing properties in a coastal plain. Our project fully recognizes the need to address the unique environmental issues related to developments of this nature. We are positive that our plan addresses each and every one of those concerns in a manner consistent with good planning and recognition of the sensitive nature of this site's location and environment.

We hope that these responses meet with your approval. If you have any further questions or comments, please don't hesitate to contact me.

Sincerely,

Environmental Consultants International Corporation



Gary T. Cuppels, PLS, PP
President