

## Appendix D. PLUS Review



STATE OF DELAWARE  
EXECUTIVE DEPARTMENT  
OFFICE OF MANAGEMENT AND BUDGET  
STATE PLANNING COORDINATION

January 7, 2008

Don Mulrine  
Town of Camden  
2 South Main Street  
Camden, DE 19934

RE: PLUS review – PLUS 2007-11-10; Town of Camden Comprehensive Plan

Dear Mr. Mulrine:

Thank you for meeting with State agency planners on December 5, 2007 to discuss the proposed Town of Camden comprehensive plan.

Please note that changes to the plan, other than those suggested in this letter, could result in additional comments from the State. Additionally, these comments reflect only issues that are the responsibility of the agencies represented at the meeting.

***Certification Comments:*** These comments must be addressed in order for our office to consider the plan amendment consistent with the terms of your certification and the requirements of Title 22, § 702 of the Del. Code.

1. The plan maps contain an incorrect municipal boundary layer. This boundary layer certain parcels intended for annexation (notably the Savannah project) as already in the town. Only parcels that have been legally annexed may be shown as in the town. All plan maps must be revised to show the actual municipal boundary. It is suggested that you use our municipal boundary layer, which is available from our website at:  
<http://stateplanning.delaware.gov/info/munbounds/munbounds.shtml>

2. The Town has committed to revising the annexation plan at the PLUS meeting and subsequently at a Camden Planning Commission meeting and a Camden Council Workshop held on December 20, 2007. The revised plan must include this amended growth and annexation map. The changes agreed upon include the following:
  - a. Removal of areas N. of Isaac's Branch as per the agreement with the City of Dover.
  - b. Removal of the northern portion of the Savannah project, and other areas west and south in the vicinity of Moose Lodge Road as per the agreement with Wyoming.
  - c. Removal of existing subdivisions east of Route 13. The commercial corridor is to remain in the annexation plan.
3. The following comments / issues regarding the Anticipated Land Use Map and accompanying text must be addressed in the revised plan:
  - a. Define "Agricultural/Transfer of Development Rights" to be clear whether or not these are sending or receiving areas. We are under the assumption that they are to be receiving areas when and if they change from agricultural to some other land use.
  - b. If Ag/TDR land use is indeed a receiving area, it is necessary to define a future land use for these parcels to be applied when and if they are developed. Please see recommendations below.
  - c. Why is half of Rodney Village "highway commercial" when the existing and presumably future land use is residential? This will not be an issue if the Rodney Village area is removed from the plan as anticipated.
  - d. Why is the entire "Long Acre Village" project shown as highway commercial, when a large portion of the project is residential? It is recommended that either the map be changed to accurately depict the commercial and residential areas, or perhaps a mixed use category could be added and applied to this area.
  - e. Why is the Briar Park development highway commercial, when it is in fact a residential neighborhood? If this area is intended to be redeveloped as a commercial project then the commercial designation is appropriate. However, if the town intends this to stay as a residential area upon annexation then the map should reflect a residential land use.
4. On the map titled Location Map, what is the significance of the Camden Area shown in pink? This area does not seem to correspond to any of the other maps, and could cause confusion in the future. It is noted that the Town of Wyoming is encompassed in the "Camden Area." The plan text must be revised to provide a description and a rationale for this area, and depending upon this rationale our

- office may have additional comments. Alternatively, this map could be removed from the plan.
5. The Existing Land Use Map is incomplete. Everything south of the Wal-Mart lacks any land use at all (including the Cooper property, Tallman, etc.) This map must be completed, at least for the areas within the current town boundaries.
  6. What is the significance of the “preserved areas” on the Historic Areas and Preservation Map? Unless these properties are subject to preservation easements or are owned by Federal, State, Local Government or a non-profit organization that has pledged not to develop them, then I suggest that they be removed from the map.
  7. Update the legend of the Transportation Route Map to identify what the red lines and symbols designate. It is presumed that these are transit routes.
  8. Remove the Savannah property from the Existing Zoning Map, since this property is not yet legally annexed into the town.
  9. On page 69 the plan states that “As may be expected in a small town which has not annexed significant property in its recent history, much of the land in Camden is developed. With limited opportunities for new development within its borders, future growth for Camden is likely to be redevelopment. . . as well as selective annexation. . .” This is not an accurate statement. The town has annexed 233 acres since June of 2003, including the Cooper and Tallman properties which are intended for future development projects. In addition, there are a number of large undeveloped properties currently within the town limits. The plan text must be revised as follows:
    - a. Revise this statement to accurately reflect annexation activities in the recent past.
    - b. Review annexation records as well as existing vacant lands in town and evaluate the potential impact of build out of these areas on future growth in the town.
    - c. Revise the annexation plan to place the proposed future annexation area in context of potential growth that can occur within the existing town boundary.
  10. Delaware Code describes required elements to be included in the comprehensive plans for municipalities over 2000 persons. The plan should be revised or reorganized to clearly address the following plan elements. Please see the agency recommendations elsewhere in this letter for recommendations. We have also attached our checklist which will provide you with additional guidance. In most

cases the plan already contains some information on each of these areas interspersed throughout the document. Information on these topics should be consolidated, new information added, and goals, objectives and implementation recommendations should be added to each of these areas:

- a. Economic Development
- b. Housing
- c. Transportation
- d. Environmental Protection
- e. Sewer and Water
- f. Implementation Element (summary of recommendations, work plan, and a path forward)

11. The plan must be revised to include some discussion of DelDOT's Corridor Capacity Preservation Program, and how the town intends to collaborate with the agency in regards to this program.
12. The plan should have a separate section for source water protection areas. This section should clearly explain the concepts of wellhead protection areas and excellent ground-water recharge potential areas. It needs to include the content of the Delaware Source Water Law. Often comprehensive plans contain the historical and or practical relevance of the Law. The Plan should express an understanding of the purpose and need to protect these areas and how the Town intends to protect these areas. The Plan also must contain source water maps and discuss the source of the data and the availability of the maps to the public.
13. DelDOT is presently conducting a planning study in the Camden area and recommends that the following paragraph be added to Section 5.1 (Streets) to address both that study and development-specific traffic impact studies:

“Traffic impact studies for proposed developments within the town and the surrounding area include consideration of additional east-west and north-south road improvements, in particular intersections along the US 13 and SR 10 corridors. The Town awaits the completion of these studies and other transportation studies being conducted by the Department of Transportation. The Town will seek consensus on the recommendations from these studies for inclusion in the Comprehensive Plan. The Town will work in cooperation with DelDOT, adjoining jurisdictions, and the development community to preserve the viability of existing and new corridors, and facilitate implementation of those improvements appropriate to development as it occurs.”

**Recommendations:** Our office strongly recommends that the Town consider these recommendations as you review your plan for final approval.

**Office of State Planning Coordination – Contact: David Edgell 739-3090**

1. Our office is very supportive of the Town's incorporation of Transfer of Development Rights into the plan. As we understand the Town's intentions, the new annexation areas to the south are to be annexed as TDR receiving areas. The owners intend to farm these lands for the foreseeable future, but if they are developed they will be considered TDR receiving areas. Development will be allowed, but in order to do so the developers must purchase development rights from the surrounding area, thus protecting additional agricultural land in the rural area. The plan does not currently have adequate detail about this program. It is strongly recommended that the plan be revised to include the following:
  - a. Clearly define the town's intentions in the text, including some basic language about how the program will work.
  - b. Clearly identify the TDR areas as receiving areas in the text and on the map.
  - c. Identify a future land use for the receiving areas that will apply when and if they are developed. Will these be residential area, commercial, mixed use, employment centers or some other land use in the future? We are assuming that they will be either mostly residential and/or mixed use areas. If more intense uses are intended, we may have additional comments.
  - d. It is strongly recommended that the town develop a new zoning district that will apply to the TDR receiving areas. This district should be in place prior to annexation, and the parcels assigned that district as soon as they are brought into the town.
  - e. The plan should include a recommendation that the town develop a TDR ordinance as an implementation item. Our office is available to assist the town in developing this ordinance.
  
2. It is recommended that the Town and their consultants carefully review the Anticipated Land Use Map on a parcel by parcel basis to ensure that the future land uses depicted are the desired uses. As noted above, our review picked up some obvious discrepancies. Please be aware that the town will have to live with this map for 5 years, and that we do not encourage small plan amendments due to oversights or errors.

3. It is recommended that the plan text be revised to include a more detailed section describing the future land uses shown on the Anticipated Land Use Map. It has proven very helpful to have a description in the plan text about what each land use is intended to be, and some towns have gone so far as to mention which zoning districts would be appropriate in certain land use categories. This tends to avoid debates and disagreements in the future over what was intended by a certain color or map designation.
4. There is a large parcel of land in the existing town boundary along Upper King Road. It is designated as “preserved” on the Historic Areas and Preservation Map and designated for future residential development on the Anticipated Land Use Map. Unless this property is legally preserved or owned by a governmental agency that has pledged to protect it, the parcel may be developed in the future. It is suggested that this parcel would be a good candidate for “Traditional Neighborhood Design” when and if developed, and it is recommended that the town consider changing the future land use designation. This parcel is centrally located within the growing town, and a traditional neighborhood design concept would allow any development on the site to be well integrated into the town.
5. It is recommended that the annexation plan for the Savannah project be removed from the plan. The plan does not include annexation plans or maps for any other project, and the area of the Savannah project is already depicted on a number of other maps.

**Division of Historical and Cultural Affairs – Contact: Terrance Burns 739-5685**

No comments received.

**Department of Transportation – Contact: Bill Brockenbrough 760-2109**

- 1) On pages 29 and 30, under Recreation, conflicting acreages are given with regard to Brecknock Park. According to the Kent County website, the park measures 86 acres.
- 2) On page 43, under Stormwater Management and Drainage, there is a recommended addition to the Town’s subdivision ordinance:  
  
“Encourage the elevation of rear yards within subdivisions to direct water towards the streets where storm drains are accessible for maintenance”

Where the street is State-maintained, this addition has the potential to conflict with DelDOT policy, which is that we will permit drainage to the State system only to the extent that the quantity and intensity of the post-development runoff does not exceed the pre-development runoff. As necessary, It is recommended that the Town discuss this matter with DelDOT's Acting Stormwater Engineer, Mr. Vince Davis. He may be reached at (302) 760-2180.

**The Department of Natural Resources and Environmental Control – Contact:  
Kevin Coyle 739-9071**

**General Comment**

A separate section or “element” should be added to identify environmental concerns and make specific recommendations to address those concerns.

**Buffers**

The Plan makes only passing reference to buffers, but makes no specific buffer width recommendations. Since vegetated buffers are important for mitigating nutrient and sediment impacts, the Watershed Assessment Section strongly urges the Town to adopt language in the Plan specifically recommending a 100-foot minimum upland buffer width (planted with native vegetation) from all wetlands and water bodies. Research has documented that a buffer width of less than 100-foot is not sufficiently protective of water quality. In fact, a literature review of existing buffer research by Castelle et al. (1994) has documented consensus among researchers that a 100-foot upland buffer is the minimum buffer width necessary, under most circumstances, to protect water quality.

**Impervious Cover**

The Plan should make specific recommendations for reducing imperviousness. Studies have shown a strong relationship between increases in impervious cover to decreases in a watershed's overall water quality. Reducing the amount of surface imperviousness through the use of pervious paving materials (“pervious pavers”) in lieu of asphalt or concrete, is an example of practical BMPs that could easily be implemented to help reduce surface imperviousness. As a consequence, it is strongly recommended that the Plan incorporate a recommendation to enact an ordinance that requires the use of pervious paving materials, whenever practicable, in lieu of conventional paving materials. The use of pervious paving materials is especially important for large commercial parking lot areas.



### **Total Maximum Daily Loads (TMDLs)**

Under Section 303(d) of the 1972 Federal Clean Water Act (CWA), states are required to identify all impaired waters and establish total maximum daily loads to restore their beneficial uses. A TMDL defines the amount of a given pollutant that may be discharged to a water body from point, nonpoint, and natural background sources and still allows attainment or maintenance of the applicable narrative and numerical water quality standards. A TMDL is the sum of the individual Waste Load Applications (WLAs) for point sources and Load Allocations (LAs) for nonpoint sources and natural background sources of pollution. A TMDL may include a reasonable margin of safety (MOS) to account for uncertainties regarding the relationship between mass loading and resulting water quality. In simplistic terms, a TMDL matches the strength, location and timing of pollution sources within a watershed with the inherent ability of the receiving water to assimilate the pollutant without adverse impact. The Town of Camden is located within the St. Jones watershed. The TMDL nutrient reduction required for the greater St. Jones watershed calls for a nitrogen and phosphorus reduction of 40% from baseline conditions. Additionally a TMDL for bacteria will require a 90% reduction from baseline conditions. A Pollution Control Strategy (PCS) will then specify the actions necessary to systematically achieve pollutant load reductions specified by a TMDL for a given water body.

### **Recommended Ordinances to Address Water Quality**

The following are specific recommendations for future ordinances:

- a) An ordinance requiring all applicants to submit a United States Army Corps of Engineers (USACE) approved wetlands delineation to the County as conditional approval for any new commercial and/or residential development. Additionally, this ordinance should also require DNREC approval of all wetland delineations involving tidally-influenced wetlands (if applicable).
- b) An ordinance requiring a 100-foot upland buffer (planted in native vegetation) from all wetlands and water bodies.
- c) An ordinance requiring the calculation for surface imperviousness for all commercial and residential development include all constructed forms of surface imperviousness, including all paved surfaces, rooftops, and stormwater management structures.
- d) An ordinance requiring a best management practice (BMP) implementation plan for all residential and commercial development exceeding 20% imperviousness.

- e) An ordinance requiring prohibiting the placement of stormwater management ponds within 100-feet of water bodies and wetlands. That is, all “newly-approved” commercial and/or residential projects should contain a vegetated (i.e., native vegetation) 100-foot upland buffer from all stormwater management ponds and water bodies/wetlands.
- f) An ordinance should be adopted that prohibits the placement of lot lines within wetlands within all “new” commercial and/or residential developments. Existing or established lots should “maximize”, to the greatest degree practicable, the distance from building structures and the wetlands line.
- g) An ordinance that prohibits development on hydric soil mapping units (using the NRCS soil survey or a licensed soil scientist as determinants).
- h) An ordinance requiring the applicant to use “green-technology” stormwater management in lieu of “open-water” stormwater management ponds whenever practicable.
- i) An ordinance which specifically excludes structural Best Management Practices (BMPs), community wastewater treatment areas, and wetlands from consideration as open space.

### **Water Resource Protection Areas**

DNREC Water Supply Section, Ground Water Protection Branch has reviewed the 2007 Comprehensive Plan for the Town of Camden for content and form. Comments to the PLUS 2004-07-03 and 2006-10-04 Plan Amendments were referenced for this review.

PLUS 2004-07-03 noted that the maps for wellhead protection and excellent ground-water recharge areas were prepared and should be included in the Comprehensive Plan. PLUS 2006-10-04 again noted the lack of maps for source water protection areas and emphasized that the areas considered for annexation were within excellent ground-water recharge areas. Source Water Maps were not included in the 2007 Draft.

The 2007 Draft includes language for wellhead protection and excellent ground-water recharge potential areas in the section on infrastructure. The language does not express an understanding of the concepts involve in source water protection and should be modified.

The Plan should have a separate section for source water protection areas. This section should clearly explain the concepts of wellhead protection areas and excellent groundwater recharge potential areas. It needs to include the content of the Delaware Source Water Law. Often comprehensive plans contain the historical and or practical relevance of the Law. The Plan should express an understanding of the purpose and need to protect these areas and how the Town intends to protect these areas. The Plan also must contain source water maps and discuss the source of the data and the availability of the maps to the public.

The Town of Camden submitted a copy of Ordinance #77 entitled “Water Resource Protection Area and Environmental Protection Regulations” in June 2007. DNREC Water Supply Section, Ground Water Protection Branch reviewed the document as PLUS 2007-10-04. It is our understanding that the Town is working with the Delaware Rural Water Association to address our comments in revising the ordinance. We encourage the Town to include us in reviewing the next ‘draft’ ordinance.

### **Sediment and Erosion Control/Stormwater Management**

Page 40: The second paragraph of the Stormwater Management section states that no regular maintenance (street sweeping or vacuum cleaning of the system) is conducted on the system. It is our understanding that the Town does in fact own a vacuum and periodically vacuums the stormwater system. Please clarify the Town’s ability and desire to conduct maintenance of the stormwater system. For water quality purposes as well as system longevity, it is recommended that you have a regular maintenance program, to include street sweeping, in addition to keeping storm drains clear of debris to allow for flow and drainage.

Page 41: You mention the recommendations from the Governor’s Surface Water Management Task Force. Several recommendations are intended to be implemented at the local level. Does the Town intend to implement any of these recommendations? If so, which recommendations do you intend to consider implementing, and how and/or when do you intend to implement these recommendations?

Page 42: You mention a meeting between the County and the Kent Conservation District regarding lines and grades. Please provide information on how the outcome of these meeting/discussion impacts Camden and new development within the Town’s boundaries. Somewhere in your Plan, you should identify Kent Conservation District as the delegated agency responsible for reviewing and approving sediment and stormwater plans for new development approved within the Town’s limits, to include future annexation areas.

Also on page 42, it seems you have listed the recommendations for additions to the subdivision code and land development code verbatim from the May 17, 2007 letter to Town Manager Don Mulrine (see attached). Does this mean that the Town endorses all our recommendations?

Identify any stormwater and drainage services you intend to provide to future annexation areas. Will the Town provide maintenance for these systems?

We are also attaching the Stormwater Section of the newly revised New Castle County Comprehensive Plan as a model of what we would like to see addressed in the Town's Plan.

### **Drainage**

The Drainage Program is appreciative of the Town's proactive approach to surface water management. Most of the recommendations from the Drainage Program described in the comprehensive plan are for future development but are useful as a guide to alleviate historical drainage problems within current development.

Obtain drainage easements for areas within the current Town boundary that have historical drainage problems. The Town should have the authority to remove blockages in drainage systems in the event of a storm.

Within the future annexation area, there are areas of poor drainage and drainage systems that are in need of maintenance. The Drainage Program will work with the Town to identify such areas and provide recommendations for adequate drainage.

For questions or clarifications, please contact Jim Sullivan at (302) 739-9921.

### **Forest Preservation**

An estimated 20,000 acres of forest have been lost in Delaware since 1990. Cumulative loss of forested habitat has led to a corresponding loss of forest-dependent species (Environmental Law Institute. 1999. Protecting Delaware's Natural Heritage: Tools for Biodiversity Conservation. ISBN#1-58576-000-5). Forest loss throughout the State is of utmost concern to the Division of Fish and Wildlife which is responsible for conserving and managing the State's wildlife (see [www.fw.delaware.gov](http://www.fw.delaware.gov) and the Delaware Code, Title 7). Because of an overall lack of forest protection, we have to rely on landowners and entities that approve projects (i.e. counties and municipalities) to consider implementing measures that will aide in forest loss reduction.

Recommendations:

1. Measures should be put in place that would provide protection for the existing forested buffers along tributaries of the St. Jones River; especially Red House Branch, Tidbury Creek and Isaac Branch. Some of these lands are proposed for annexation for commercial and residential development. Developers should be required to leave the existing forested riparian buffers intact. Lot lines and infrastructure should not be placed within the buffer zones. Buffers should be comprised of native vegetation and not simply mowed lawn areas. These recommendations are based on peer reviewed scientific research.

From a wildlife perspective, not only are buffers important for maintaining the function and integrity of wetland habitat, but these buffers also provide critical habitat for wetland dependent species during a portion of their life cycle. Also, buffers along riparian areas are especially important for wildlife travel.

2. Few large, connected areas of forest remain within the Town of Camden and those that remain should be preserved as open space. There are forested areas within the proposed Savannah development that are going to be cleared. If this development is annexed, the Town should require that the forested areas providing a connection to other forested areas to the north and south be maintained as open space.
3. Several other large forest blocks proposed for annexation are planned to be zoned residential. Again, the Town should take a proactive approach and provide for the protection of the green spaces and natural resources within its limits.

It would be even more beneficial if there was an incentive to preserve these areas *before* they are earmarked for development. There was some indication in the plan that additional recreational opportunities and open space were desirable and these forested areas could fulfill part of that need.

### **Rare Species**

Please note that the entire area within the Town of Camden and lands proposed for annexation have not been surveyed for the presence of rare species, so it is unknown what impact developing some of these areas could have on those species.

The following species are known to occur within these areas:

Scientific Name	Common Name	Taxon	State Rank	State Status	Global Rank	Federal Status
<i>Corragyps atratus</i>	Black Vulture	Bird	S2B		G5	
<i>Melanerpes erythrocephalus</i>	Red-headed Woodpecker	Bird	S1		G5	
<i>Enneacanthus chaetodon</i>	blackbanded sunfish	Fish	S2		G4	
<i>Notropis chalybaeus</i>	ironcolor shiner	Fish	S1		G4	
<i>Anodonta implicata</i>	Alewife floater	Freshwater mussel	S1		G5	

**State Rank:** S1- extremely rare within the state (typically 5 or fewer occurrences); S2- very rare within the state (6 to 20 occurrences); B - Breeding; N - Nonbreeding; SX- Extirpated or presumed extirpated from the state. All historical locations and/or potential habitat have been surveyed; SH- Historically known, but not verified for an extended period (usually 15+ years); there are expectations that the species may be rediscovered; SE-Non-native in the state (introduced through human influence); not a part of the native flora or fauna.

**State Status:** E – endangered, i.e. designated by the Delaware Division of Fish and Wildlife as seriously threatened with extinction in the state;

**Global Rank:** G1 - imperiled globally because of extreme rarity (5 or fewer occurrences worldwide); G2 - imperiled globally because of great rarity (6 to 20 occurrences); G3 - either very rare and local throughout its range (21 to 100 occurrences) or found only locally in a restricted range; G4 - apparently secure globally but uncommon in parts of its range; G5 - secure on a global basis but may be uncommon locally; T\_ - variety or subspecies rank; Q – questionable taxonomy;

**Federal Status:** LE – endangered, i.e. designated by the U.S. Fish and Wildlife Service as being in danger of extinction throughout its range; LT – threatened, i.e. designated by USFWS as being likely to become endangered in the foreseeable future throughout all or a significant portion of its range; PS Candidate – Taxa for which the U.S. Fish and Wildlife Service has on file enough substantial information on biological vulnerability and threat(s) to support proposals to list them as endangered or threatened species.

We highly recommend that impacts to rare species and wildlife habitat be considered when land use changes are proposed. In addition, our staff may like the opportunity to survey some of these areas so that we can provide informed comments and recommendations that would reduce impacts to rare species, especially those that are listed as State-rare.

**State Fire Marshal's Office – Contact: Duane Fox 739-4394**

These comments are intended for informational use only and do not constitute any type of approval from the Delaware State Fire Marshal's Office.

At this time, this Agency has no objection to, and makes no comments regarding, the Comprehensive Plan or an amendment to a Comprehensive Plan.

The Delaware State Fire Marshal's Office has the responsibility to review all commercial and residential subdivisions for compliance with the Delaware State Fire Prevention Regulations. This Agency asks that a MOU be established between the Delaware State Fire Marshal's Office and the Town of Camden. The State Fire Marshal's Office would be issuing approvals much like DelDOT, Kent Conservation, and DNREC. This Agency's approvals are based on the Delaware State Fire Prevention Regulations only.

**Department of Agriculture - Contact: Scott Blaier 698-4500**

The Department would like to commend and congratulate the Town on a well conceived draft comprehensive plan, especially with regard adhering to the "Livable Delaware" principles and farmland preservation. The Department offers the following comments.

Page 26: The acronym "DNREC" is misspelled "DENREC" at the top of the page.

Page 69: The plan provides a good discussion on TDR. The Department encourages the Town's to participate in a TDR program when established.

The Department encourages the Town to include more discussion about future economic development in the plan, including agriculture. The Department encourages the town to develop and promote agricultural business whenever possible, such as: farm markets, agricultural processing facilities, agricultural support businesses (i.e. fertilizer/pesticide dealers), etc. The Department now has a fully staffed marketing section, and we encourage the town to contact them at (302) 698-4535 to see how they can help.

And finally, the Delaware Forest Service would like to work with the Town of Camden to develop a comprehensive urban forestry plan that would address relevant issues within the town. Trees should be considered a part of the town's infrastructure just as roads and utilities. Planning to include tree conservation during development, and tree canopy goals would dovetail with goals already stated in the current update of the comprehensive plan. Please contact the Delaware Forest Service at (302) 659-6705 for more information.

**Public Service Commission - Contact: Andrea Maucher 739-4247**

Any expansion of natural gas or installation of a closed propane system must fall within Pipeline Safety guidelines. Contact: Malak Michael at (302) 739-4247.

**Delaware State Housing Authority – Contact Vicki Powers 739-4263**

DSHA has reviewed the Municipal Comprehensive Plan for the Town of Camden to determine how the Municipality has incorporated the State's goals, policies, and strategies as they relate to affordable housing. Since the Town of Camden has a population over 2,000 people, HB 396 mandates that towns of 2,000 or more develop a plan to address affordable housing, which the plan does state. However, because of the increasing housing challenges facing this area, we encourage the Town of Camden to also include incentives that ensure long-term affordable housing for low- and moderate-income persons.

The following list of tools and mechanisms are examples of some initiatives that the Town of Camden can implement in creating affordable housing opportunities to residents and employees:

- Innovative zoning techniques to provide additional affordable housing opportunities within the existing housing stock, such as permitting accessory dwelling units in residential areas as a matter of right;
- Require, as part of all annexation agreements for parcels being annexed, that some of the units be set aside to be affordable for low- and moderate-income persons via long-term affordability restrictions;
- Partner with the Diamond State Community Land Trust (DSCLT) to ensure long-term affordable homeownership opportunities to low- and moderate-income households. This can be done by donating land to the DSCLT, within the Town of Camden, or through contractual agreements for monitoring long-term affordability restrictions on units that have been set aside to be affordable; and
- Provide developer incentives, such as density bonuses or expedited review, to facilitate affordable housing opportunities.

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](http://www.destatehousing.com) "Affordable Housing Resource Center" under our new initiatives.



**Department of Education – Contact: John Marinucci 735-4055**

The DOE supports the State Strategies for Policies and Spending, to the extent possible and practicable within the limits of the Federal and State mandates under which the Department operates.

1. In its review of Comprehensive Plans and Comprehensive Plan Amendments, the DOE considers:
  - Adequate civil infrastructure availability within the region to accommodate current and future educational facilities.
  - Transportation system connections and availability to support multimodal access within the community, to include but not limited to walk paths, bike paths, and safe pedestrian grade crossings.
  - Transportation road system adequacy to accommodate bus and delivery vehicle traffic to current, planned or potential educational facilities.
  - Recreation facilities and opportunities within the community and their respective proximity to current and planned or potential education facilities. The DOE also recognizes the potential that the educational facilities are to be considered recreational facilities by and within the community.
2. The DOE *typically* considers industrial/commercial development incompatible with educational facilities, however, residential development and educational facilities *are typically* considered to be compatible. As a result, the DOE is interested in the proximity of current and planned or potential education facilities to commercial/industrial development zones.
3. The DOE recognizes the integral role of educational facilities within communities. As such, the DOE seeks to assure that residential growth, that generates additional demand on educational facilities, is managed with adequate educational infrastructure being made a part of sub-division plans as appropriate.
4. The DOE offers its support to assist and participate by coordinating with this municipality, the local school districts the County, the Office of State Planning Coordination as well as other school districts and stakeholders as future development and annexations may be considered.
5. DOE has no objections or comments regarding the Comprehensive Plan under consideration.

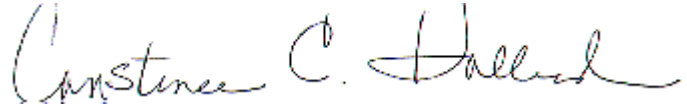
- Transportation system connections and availability to support multimodal access within the community, to include but not limited to walk paths, bike paths, and safe pedestrian grade crossings.
- Transportation road system adequacy to accommodate bus and delivery vehicle traffic to current, planned or potential educational facilities.
- Recreation facilities and opportunities within the community and their respective proximity to current and planned or potential education facilities. The DOE also recognizes the potential that the educational facilities are to be considered recreational facilities by and within the community.

***Approval Procedures:***

1. Once all edits, changes and corrections have been made to the plan, please submit the completed document (text and maps) to our office for review. **Your PLUS response letter should accompany this submission.** Also include documentation about the public review process. In addition, please include documentation that the plan has been sent to other jurisdictions for review and comment, and include any comments received and your response to them.
2. Our office will require a maximum of 20 working days to complete this review.
  - a. If our review determines that the revisions have adequately addressed all certification items, we will forward you a letter to this effect.
  - b. If there are outstanding items we will document them in a letter, and ask the town to resubmit the plan once the items are addressed. Once all items are addressed, we will send you the letter as described above.
3. Once you receive our letter stating that all certification items have been addressed, your Planning Commission and Council should adopt the plan pending State certification. We strongly recommend that your Council adopt the plan by ordinance. The ordinance should be written so that the plan will go into effect upon receipt of the certification letter from the Governor.
4. Send our office a copy of the adopted plan along with the ordinance (or other documentation) that formally adopts your plan. We will forward these materials to the Governor for her consideration.
5. At her discretion, the Governor will issue a certification letter to your town.
6. Once you receive your certification letter, please forward two (2) bound paper copies and one electronic copy of your plan to our office for our records.

Thank you for the opportunity to review this plan. If you have any questions, please contact me 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 typed name.

Constance C. Holland, AICP  
Director

CC: Town of Wyoming  
Kent County  
City of Dover