

Jamie Whitehouse

From: Keith Steck <steckke@gmail.com>
Sent: Friday, February 5, 2021 3:43 PM
To: Jamie Whitehouse; Lauren DeVore
Subject: Comments on PLUS Review on Reed Farm Request
Attachments: 2021 Jan 12 DE Bus Times--Developer moves Beebe-anchored complex outside Milton.pdf

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For the record, what follows are my comments on the Delaware State Planning Coordination PLUS Review 2020-12-05 on the proposed changes to the Sussex Comprehensive Plan regarding the Reed Farms site, Ord. 20-07, as identified on the P&Z Commission agenda for Dec. 17th, 2020. I am speaking with first-hand knowledge about the issues I raise because I live less than a mile as the crow flies from the Reed Farms site.

As the PLUS review notes, there are numerous concerns with respect to rezoning these parcels and changing the comprehensive plan and map(s). To start, these parcels--235-13.00-29.00, 235-13.00-29.01, and 235-14.00-570.00. I have supplemented the comments in the PLUS review with comments and additional relevant information, including an attachment.

The review points out this is a state Level 4 area, so too does Chapter 4 of the county's comprehensive plan. Accordingly, the state has no short- or long-term plans to invest in development on or near this site. There are no road expansion plans, no other infrastructure plans, nothing that would support industrial development. There are also no explicit plans for water and sewer services in the area, although the plan does not state this directly.

DNREC Highlights Concerns

To be clear, no public water or sewer services exist in the area surrounding the Reed Farms site nor are there likely to be in the next few years. DNREC alludes to this in its comments. It first notes that the comprehensive did not propose this area to be industrialized and the Reed Farms rezoning "represents a significant departure from the land use proposed for this area in the... Comprehensive Development Plan." It goes on to discuss how there needs to be more "collaboration and dialogue" about needed infrastructure investment. DNREC does not mention there is an underground Artesian pipeline on the Rte 30 side of the parcels, which cannot be hooked into as a sewer link, as it a transmission line that is eventually supposed to carry treated wastewater from Allen Harim's Harbeson chicken processing plant to Artesian's holding lagoon north of Milton so sewage and other wastewater cannot be added to that pipeline.

Moreover, DNREC goes on to raise concerns about environmentally sensitive areas, notably the Broadkill River Natural Area, "immediately south of the parcels of interest." As a local resident, I understand firsthand the concerns, as I frequently see eagles fly over this area and observe a wide variety of waterfowl, a small rookery of herons, other birds, and all types of land animals, all of which add to the character of the western side of Milton and Wagamons Pond and the Broadkill River, which are at the center of Milton.

DelDOT Comments Are Vague

As for DeIDOT's comments skirting the issue of amending the comprehensive plan, county officials should be coordinating with DeIDOT officials to require a TIS for the immediate area, especially the intersection of Routes 16 and 30. This is particularly true given the pending construction of the McLamb Medical Pavilion complex and its impact on any development at the Reed Farms site. While the McLamb plan only notes the construction of one building, the developers plan to build a second very soon and possibly a third building after, according to a Jan. 2021 Delaware Business Times article--see attached. At least one DeIDOT official met with that developer in January and knows about other significant developments in Milton that will affect traffic issues in the immediate area. You owe it to the area residents to find out about traffic issues now while you're considering changing the comprehensive plan, even if they are specifically identified in the PLUS review.

Proposed Rezoning and Changing Comprehensive Plan Are Inconsistent With Existing Plan and Nearby Zoning

In addition to the concerns raised by the state planning office about rezoning and changing the designation to Heavy Industry H-1 and allowing heavy industrial development to take place, the PLUS review also highlights how carving out areas within the parcels for retail sales and offices would be out of compliance with the comprehensive plan. It's also not consistent with the zoning and development plans for the parcels across Rte. 30, which are zoned for commercial and residential development.

The proposed changes to rezone the Reed Farms parcels and corresponding changes to the comprehensive plan don't tie into what local residents expect or need, especially given the planned and pending development directly east and across Rte. 30 from the Reed Farms parcels. In fact, the week before the hearing on this particular proposal, the P&Z Commission included discussion of the McLamb Medical Pavilion preliminary site plan on the Dec. 10th agenda; that proposal is consistent with the zoning of that site, Chapter 4 of the comprehensive plan, and the needs of the community, unlike the Reed Farms rezoning and comprehensive plan requests. The parcels of the McLamb project are already designated for commercial and residential development and are now on the cusp of seeing that vision being realized. Rezoning Reed Farms, changing the comprehensive plan, and industrializing the Reed Farms property are not consistent with any of the existing and planned residential development, the pending medical office development and other soon-to-come commercial development, or the approved comprehensive plan. And rezoning and changing the comprehensive plan are also not consistent with the preserved land north of the site, which is in agricultural and nature preservation.

I and others agree that uses of the Reed Farms parcels for non-agricultural, heavy industrial purposes are not what we expected when we provided input to the development of the comprehensive plans. It's also not what was approved when the comprehensive plan was developed and approved by both Sussex County officials and the State of Delaware. I and others attended many workshops and public input sessions on the development of the comprehensive plan and did so in good faith and with the expectation that this plan would be largely adhered to by county government, including the P&Z Commission and Council. However, here we are again discussing yet another rezoning of areas of pristine farmland into some industrial operations that are not compatible with the comprehensive plan and the surrounding areas of preserved land and approved commercial and residential development... in this case between Rte. 30 and east to Milton. This Reed Farms PLUS review raises concerns about rezoning the parcels; leaving it as AR is consistent with the 2006 PLUS map of the area where the McLamb Medical Pavilion indicates the land immediately on the western edge--the Reed Farms site--is of the "highest value agriculture." In effect, ignoring the comprehensive plan, state comments, and public sentiment and instead rezoning the property and changing the plan undermine the public's faith and trust in local officials--both elected and appointed--and the confidence that agreements like the comprehensive plan represent.

Further, putting in heavy industrial operations and/or retail offices on the Reed Farm site fly in the face of the public's overall stated interest and desire to maintain the rural and agricultural character of Sussex County. In addition, if the P&Z Commission and/or County Council approve rezoning this site and changing the comprehensive plan, it would be yet another example of piece-meal changes and creating another patch of industrialization on what's becoming a crazy quilt mix of residential, commercial, and industrial development of this county.

Stick to the comprehensive plan and do not approve rezoning the Reed Farms site and changing the comprehensive plan.

Respectfully submitted

Keith Steck

Milton, DE

DELAWARE BUSINESS TIMES

Developer moves Beebe-anchored complex outside Milton



January 12, 2021

SHARE



Phoenix RHCS Holdings has resubmitted plans for a medical pavilion on the outskirts of Milton.

MILTON — After withdrawing plans to construct a \$35 million medical office complex in downtown Milton, developer Phoenix RHCS Holdings has moved the project 3 miles outside town limits with the help of a new partner.

Phoenix RHCS Holdings principal owner Chris Selzer announced that he was working with well-known local firm **DiSabatino Construction** to build Jerry Ann McLamb Medical Pavilion at the intersection of Routes 16 and 30.

Preliminary site plans approved by the Sussex County Planning Commission show a single 40,000-square-foot building, but Selzer confirmed the campus envisions at least two buildings, with the possibility of a third in the future.

“We are excited to partner with DiSabatino Construction on this project. We had many options as we considered the future of the Jerry Ann McLamb Medical Pavilion, but DiSabatino has the experience in construction and design, and that is no small matter,” Selzer told Delaware Business Times.

“We’re thrilled to have such a partnership with a major medical operator with a vision for this property,” added Kevin DiSabatino, vice president of business development and real estate for the namesake firm.

The pavilion’s name honors Selzer’s mother-in-law McLamb, a Milton native and dedicated Beebe registered nurse who died in 2018. She graduated from the Beebe School of Nursing and spent most of her 50-year career in the health system.

Phoenix RHCS first proposed the medical campus in downtown Milton in early 2020, with **Beebe Healthcare's** support. Beebe plans to use the space for outpatient services such as primary and walk-in care, specialists, lab and rehabilitation services, and diagnostic imaging.

"My mother-in-law introduced me to [Beebe Executive Vice President and Chief Operating Officer] Rick Schaffner socially," Seltzer said. "But while we were making plans for this complex, we knew that Beebe would be a natural fit for us. Not only because they're delivering great health care in Sussex, but because of that connection. Jerry even has bricks placed in front of Beebe's Lewes campus. That connection is important."

But public outcry over commercial ventures in residential areas and unfavorable recommendations from the town's Planning Commission led Phoenix RHCS Holdings to withdraw its application.

"We wanted to remain close to Milton, and in order to facilitate the project moving forward more quickly, we decided to look for property outside town limits," Selzer said.

The proposed campus would be on 142 acres owned by DiSabatino Construction, which was acquired decades ago. It was rezoned in the mid-2000s with the hope of developing the land into a commercial and residential complex, but the company opted to wait out the recession before moving forward.

DiSabatino declined to comment on whether those plans were still moving forward. However, the application to the county Planning Commission notes that Phoenix RHCS Holdings is pursuing a minor subdivision along with the medical complex.

Beebe Healthcare spokesman Ryan Marshall confirmed that Beebe will be a tenant of the McLamb Medical Pavilion, and that Beebe is “ecstatic to have the opportunity to expand the medical services we offer in Milton.”

The pavilion will be Beebe’s most northern location, continuing a string of recent expansions through Sussex County. This spring, Beebe opened a freestanding emergency department and a cancer center at the Beebe South Coastal Health Campus in Frankford. Construction work is underway at Beebe’s \$124 million surgical hospital on Route 24 near Rehoboth Beach with a target opening in 2022.

“Now, more than ever, it is essential that Milton residents, and the surrounding community, have access to local and readily accessible health care,” Marshall said in an email to DBT. “As the approval process continues, we look forward to sharing more information about Beebe’s presence on the campus.”

Construction on the McLamb Medical Pavilion is expected to start this summer, pending the county’s planning process, and Beebe is currently slated to open the doors of its offices at the end of 2022.

By Katie Tabelaing

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By Katie Tabelaing



**STATE OF DELAWARE
EXECUTIVE DEPARTMENT
OFFICE OF STATE PLANNING COORDINATION**

January 17, 2020

February 4, 2021

Jamie Whitehouse, AICP
Sussex County
Department of Planning and Zoning
P.O. Box 589
Georgetown, DE 19947

RE: PLUS review 2020-12-05; Sussex County Comprehensive Plan Amendment

RE: PENNONI'S RESPONSE TO PLUS REVIEW DATED JANUARY 17, 2021 (2020 TYPO)

Dear Mr. Whitehouse:

Pennoni, on behalf of Reed Farms, LLC, the applicant for the rezoning application prompting the Sussex County Comprehensive Future Land Use Plan amendment responds to the comments made during the December 16, 2020 PLUS Meeting and the following comments generated from the above-referenced meeting. Thank you for allowing our comments to be made part of the record.

Thank you for meeting with State agency planners on December 16, 2020 to discuss the proposed Comprehensive Plan Amendment for Sussex County. This amendment would change the Future Land Use Map for several parcels from AR-1 to HI-I

Please note that additional changes to the plan could result in additional comments from the State. Additionally, the comments below reflect only issues that are the responsibility of the agencies that were represented at the meeting.

Office of State Planning Coordination — Contact Dorothy Morris 739-3090

- The office has concerns with the plan amendment because is within a Level 4 area according to the 2020 Strategies for State Policies and Spending. In Investment Level 4 Areas, the State's investments and policies should retain the rural landscape, preserve open spaces and farmlands, support farmland-related industries, and establish defined edges to more concentrated development.

122 Martin Luther King Jr. Blvd. South — Haslet Armory- Third Floor - Dover, DE 19901
Phone (302)739-3090 Fax (302) 739-5661- www.stateplanning.delaware.gov

We are not certain of the State's concern with this plan amendment as presented. The State's Investment maps contained within the Strategies for State Policies and Spending document are not parcel-based, and, therefore, it is necessary to thoroughly investigate the constraints of particular land parcels for each application, even though they may be contained in one of the growth-oriented investment levels of the Strategies for State Policies and Spending.

With that said, we understand that Investment Level 4 Areas may be the location for certain uses that because of their specific requirements are not appropriate for location elsewhere. Such uses, expected to be limited in number, could involve public safety or other uses that require their location outside designated investment areas. Industrial activity would be limited, except where specific requirements of major employers may dictate an exception for a use, which, because of specific siting and potential conflicts with neighboring uses, should not be placed elsewhere. We saw this site plan in August and at that time expressed concerns about the storage space and stand-alone flex sites.

According to the Future Land Use Plan for Sussex County, Industrial Uses are almost always located on the verge of Developing Areas and near transportation resources such as arterial roadways or railroads. This proposed project follows the same pattern, evidenced by a number of factors. First, the properties are located next to existing Heavy Industrial zoned uses and a Developing Area. The Developing Area located across Route 30 is zoned for High Density Residential and General Commercial uses according to the current Sussex County Zoning Map. In addition, the properties south of this parcel are currently zoned Heavy Industrial (HI-1) and are home to Baker Petroleum and Wyoming Millworks. Furthermore, Iron Works, Inc., located north of the site at the intersection of Routes 30 and 16, is currently zoned General Commercial. Second, transportation resources surround the property. Route 30 is designated as a Truck Route (Alt Route 5) by existing DelDOT signage on Route 16. Route 16 is a major collector. The existing Delmarva Central Railroad line is located between Baker Petroleum and Reed Farms. Both the highways and the railroad serve as the transportation infrastructure necessary for the existing and proposed uses. Finally, the proposed use will require a work force. The project is located approximately 1 mile from the municipal town limits of Milton and within ½ mile of the Town Center on the 2019 Future Land Use Plan of Sussex County. The proximity of these areas could potentially serve as an important employment base for this site, resulting in a short commute time for those employees.

Because of its location in a Level 4 area but along the railway, the State would support this as an Ag Industrial Site and we urge the county to consider a conditional use for the balance of the site to ensure that the additional uses toward the front of the site relate to agriculture. Allowing stand alone uses such as retail sales, veterinary offices, etc. would be out of compliance with the Strategies for State Policies and Spending in a Level 4 area. We again urge the County to consider an Agricultural Zone to be used in the future to ensure that the land needed to move goods produced by farmer is available.

What are some of the Ag Industrial uses the State would recommend putting within the property that would suggest the need for a Conditional Use? The State fails to make these recommendations. Pursuant to the Sussex County Zoning Code, *the purpose of a Conditional Use is to provide for certain uses which cannot be well adjusted to their environment in particular locations with full protection offered to surrounding properties by rigid application of the district regulations. These uses are generally of a public or semipublic character and are essential and desirable for the general convenience and welfare but, because of the nature of the use, the importance of the relationship to the Comprehensive Plan and possible impact not only on neighboring properties but on a large section of the county, require the exercise of planning judgment on location and site plan.*

The Reed Farm property is within an area with existing HI-1, HR-1, C-1 and B-1 zoned parcels and existing commercial and industrial uses, with access to both Delaware Route 30, a major collector north-south roadway and Delaware Route 16, a major collector east-west roadway in Sussex County, and is adjacent to the Delmarva Central Railroad line, with existing spur connections to Baker Petroleum and Wyoming Mill Works making it an appropriate site for HI-1 zoning on its own merits and generally consistent with the Future Land Use Plan.

The State's response states that allowing certain uses such as, retail sales, veterinary offices, etc "would be out of compliance with the Strategies for State Policies and Spending in a Level 4 area." However, Level 4 Areas are primarily Low Density and AR-1 Agricultural Residential lands within Sussex County. First, permitted uses allowed on AR-1 land are Commercial Dog Kennels and Hospitals or Clinics for Large or Small Animals as well as retail sales of greenhouses, orchards, and nurseries that the State says it is trying to discourage. Second, the 2019 Comprehensive Plan contains Table 4-5-2, Zoning Districts Applicable to Future Land Use Categories, which the plan describes as "*a tool* for assisting with determining which zoning districts are applicable to each future land use category". In the table it states that in a Low-Density area of the County, B-2 Business Community District and C-2 Medium Commercial District are applicable zoning districts and therefore uses permitted within these districts, i.e., veterinary clinics (offices) and retail sales would be in compliance within a Low Density, Level 4 area of the County.

In addition, the state asks that the County consider creating a process to review comprehensive plan amendments on a scheduled basis, possible once or twice a year. While the state understands that the counties will, from time to time, have amendments that need to be considered we remind the County that this is a 10 year planning document that was adopted after a much input from municipalities, business, developers, and residents within the county. The plan that was ultimately adopted was intended to be a guide book to show the developers and residents of Sussex County how and where the County intends to grow. To amend the document sporadically can undermine that process.

We concur with the State noting that the Comprehensive Plan is a "guide book" and is referred to as a "*tool*" for assisting with determining which zoning districts are applicable to each future land use category and that future rezoning's should also "*generally*" be consistent with the Future Land Use Plan. The Plan further states that each land use proposal the County receives should be reviewed on its own merit to determine if the proposal is consistent with the Future Land Use Map and does not have a negative impact on the surrounding area or the County in general. Sussex County contains approximately 938 square miles of real estate with approximately 168,500 tax parcels; therefore, every parcel was not reviewed on its individual constraints and benefits when considering growth-oriented investment levels and areas for future development.

Department of Transportation — Contact Bill Brockenbrough 760-2109

- DelDOT has no comments on the subject comprehensive plan amendment. In August 2020, in response to a PLUS application pertaining to the rezoning that the subject amendment would enable, DelDOT provided detailed comments. A copy of those comments is attached. Then, as now, however, DelDOT's comments are oriented primarily to the site plans that would follow if the County approves the amendment and rezoning.

We provided our responses to DelDOT's comments in our October 30, 2020 PLUS response to comments received. We look forward to working with DelDOT on future planning of roadway improvements for the project.

Department of Natural Resources and Environmental Control — Beth Krumrine 735-3480

- The parcels of interest are in Delaware State Strategies Level 4 lands, located directly west of Milton on Route 16 (Milton Ellendale Highway). The application indicates rezoning from Agricultural Residential (AR-1) Zoning District to Heavy Industrial Zoning District (HI-1). According to Sussex County Code § 115-109, “The purpose of this district is to provide for a variety of industrial operations but to restrict or prohibit those industries which have characteristics likely to produce serious adverse effects within or beyond the limits of the district. Certain potentially hazardous industries are permitted only after public hearings and review to assure protection of the public interest and surrounding property and persons. It is the intention of the district to preserve the land in the district for industrial use and to exclude new residential or commercial development, except for certain specified uses deemed appropriate adjuncts to industrial operations.”

This property is located in a Level 4 area and is immediately adjacent to Level 2 and Level 3 areas. In Sussex County there are areas where county growth areas can be expanded for applications that can demonstrate good logic and rationale for the County’s zoning. In some cases, they are in State Investment Level 4 areas. This property is located west of Milton (1 mile from the municipal town limits of Milton and within ½ mile of the Town Center), not only on Route 16 (Milton Ellendale Highway) but also on the west side of Delaware Route 30 (Gravel Hill Road) and adjacent to the existing Delmarva Central Railroad line. For DNREC’s additional information, Route 30 is designated as a Truck Route (Alt Route 5). In addition, the properties south of this parcel are currently zoned Heavy Industrial (HI-1) and are home to Baker Petroleum and Wyoming Millworks. Furthermore, Iron Works, Inc. is located north of the site, at the intersection of Routes 30 and 16, and is currently zoned General Commercial. The existing Delmarva Central Railroad line is located between Baker Petroleum and Reed Farms.

The 2019 comprehensive plan did not propose industrial development in this area. The rezoning to HI-1 represents a significant departure from the land use proposed for this area in the March 2019 Sussex County Comprehensive Development Plan. Heavy Industrial uses will require infrastructure such as roads, transit, water, and wastewater.

The State is correct that the Comprehensive Plan did not propose industrial development in this Low-Density, Level 4 area, which is why the applicant petitioned the County to update the Future Land Use Map as part of its rezoning application for this property. The application and supporting documentation and testimony submitted and presented before the County provides the logic and rationale for the County to determine the rezoning for this property. It is important to note that the land use classifications within the Future Land Use Plan are not zoning districts, and the classifications can include multiple zoning districts within them. The Plan outlines that multiple zoning districts can be appropriate in a given planning area, depending on a variety of circumstances that may be relevant to a particular parcel of land in that planning area. DNREC should understand that it is important to recognize that other factors come into play when determining which zoning districts are appropriate for each land use classification. The following factors are described in the Comprehensive Plan as important for determining an area’s land use classification:

Proximity to an incorporated municipality or a municipal annexation area.

The property is 1 mile from the municipal town limits of Milton and within ½ mile of the Town Center

Presence of existing public sewer and public water service nearby.

The property is located within Tidewater Utilities CPCN and has availability to connect to an Artesian Force Main that is located within the property along the entire Delaware Route 30 frontage of the of the property. Public water could easily be served by the Town of Milton, Tidewater Utilities or Artesian for both fire protection and domestic water.

Plans by the County to provide public sewage service within five years.

The property is located within Sussex County's Tier 3 Coordinated CPCN Area and is located within Tidewater Utilities CPCN and has access to Artesian's Public Sewer.

Location on or near a major road or intersection.

The property has access to both Delaware Route 30, a major collector north-south roadway and Delaware Route 16, a major collector east-west roadway in Sussex County.

Character and intensity of surrounding development, including proposed development.

The property is within an area with existing HI-1, HR-1, C-1 and B-1 zoned parcels and existing commercial and industrial uses and is adjacent to the Delmarva Central Railroad line. The Developing Area located across Route 30 is zoned for High Density Residential and General Commercial uses according to the current Sussex County Zoning Map. In addition, the properties south of this parcel are currently zoned Heavy Industrial (HI-1) and are home to Baker Petroleum and Wyoming Millworks. Furthermore, Iron Works, Inc. is located north of the site, at the intersection of Routes 30 and 16, and is currently zoned General Commercial.

Location relative to major preserved lands.

The property is approximately 4,200-feet east of and across Delaware Route 16 from Agricultural Easements. As DNREC is aware, these parcels serve as the wastewater disposal area for the Artesian Wastewater Management, Inc. Regional Sewer Plant.

Location of water bodies.

The property is not located near any water bodies; however, the property is located approximately 1,500-feet north of Brittingham Branch and Pemberton Branch.

Rezoning should consider infrastructure development needs, which should also be addressed in the comprehensive plan or master plan. Please consider further collaboration and dialogue with other entities about the infrastructure investments that would be necessary to support industrial activities in this area. This includes the potential secondary effects of industrial development, as well as potential public transit needs, job centers, and bike paths/trails.

DNREC should refer to the OSPC PLUS comments dated September 24, 2020, to which Pennoni responded dated October 30, 2020 and which were made part of the County record through the public hearing process.

Likewise, existing neighborhoods are located immediately to the southeast of the area of interest. Local residents should be afforded opportunities to engage in designing the future uses of these areas in a robust and meaningful way. For this reason, rezoning of this area should be contemplated in the comprehensive development plan or a separate master planning process.

The property is located across Delaware Route 30 from one (1) existing neighborhood, known as Pemberton, and a few larger residential strip lots.

In summary, DNREC reviewers feel that additional planning efforts are necessary before proceeding with a rezoning of this area for the following reasons:

- Located in level 4
- Need to address such changes in the comp plan
- Lack of transportation options for employees
- Existing neighborhoods nearby

The particular facts of this application (location, existing zoning and uses, proximity to two major collector roads and the railroad line and the ability to connect to public sewer and water), as well as the above responses and prior October 30, 2020 responses, support the requested HI-1 rezoning. This information and the responses establish that the rezoning would be, at a minimum, “generally” consistent with the Future Land Use Plan, particularly since the purpose of the plan is to serve as a guide for future development and is only identified as a “tool” to assist in making such determination.

Wastewater Permitting — Small Systems

- Expired permits held with the DNREC Ground Water Discharges Section exist on the site. These systems must be abandoned properly if no longer in use. Notify DNREC Groundwater Discharges Section of any changes by reaching out to the Sussex County Branch at (302) 856-4561 (<https://dnrec.alpha.delaware.gov/water/groundwater/septic-systems/>).

For any future permitting of Small Wastewater Systems, site evaluations must be performed by a Delaware licensed Class D Soil Scientist to determine the type of disposal system allowed under current regulations and site conditions. A list of licensed Class D soil scientists can be found at the following website:

<https://www.dnrec.delaware.gov/wr/Information/GWDInfo/Documents/Class%20D%20is t.pdf>

Expired permits:

- 235-13.00-29.00
 - Gravity system permit (Small Systems) is expired, dated January 27, 2001.
 - A site evaluation completed by a licensed Class D Soil Scientist expired on January 19, 2005.
- 235-13.00-29.01
 - There is an active permit that will expire on January 24, 2021 for a capping filled pressure dosed system (Small Systems).
 - The site evaluation will expire on January 2", 2023.
- 235-14.00-570.00
 - There are no existing permits or site evaluations under this tax parcel.

Natural Area Located Within Near Vicinity

- The Broadkill River Natural Area exists immediately to the south of the parcels of interest. Natural Areas contain lands of statewide significance identified by the Natural Areas Advisory Council as the highest quality and most important natural lands remaining in Delaware. Should the parcels ultimately be rezoned, site design should reduce environmental impacts near Natural Areas by avoiding impacts to sensitive areas such as wetlands and forest habitat.

We are NOT “immediately” next to the Broadkill River Natural Area, “immediately”, referring to adjacent. We are located approximately 1,500-feet north of this area and have no direct surface connection to the branches located within this Natural Area. Also, two (2) existing Industrial uses are located between our property and the Broadkill River Natural Area as well as the States Emergency Operation Tower. Stormwater for this property will primarily be infiltration Green Technology-type stormwater Best Management Practices which will help with groundwater recharge as well as not impact sensitive wetland and forest habitat that is not located within this property but further south from this property.

Once a decision has been reached on this proposed comprehensive plan amendment, please forward a copy of the plan amendment to the Office of State Planning Coordination for our records. The plan amendment must include the adopting resolution or ordinance, a revised version of any maps that were updated as well as any text that was approved in amending the comprehensive plan. If the amendment is not approved by the town, please notify the office so we can update our records.

Thank you for the opportunity to review this Comprehensive Plan amendment. If you have any questions, please contact me at 302-739-3090.

Sincerely,



Constance C. Holland, AICP
 Director, Office of State Planning Coordination



Mark H. Davidson, VP
 Principal Land Planner - Pennoni