



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

July 20, 2011

Mr. Gary Norris, AICP  
City of Milford  
201 S. Walnut Street  
Milford, DE 19963

RE: PLUS 2011-06-01; Milford South East Master Plan

Dear Mr. Norris:

Thank you for meeting with State agency planners on June 22, 2011 to discuss the proposed City of Milford South East Master 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.

The Office of State Planning has received the following comments from State agencies regarding the City of Milford Master Plan.

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

- On page 49, the first page of Chapter 8, there is a list of DelDOT projects. Item c in that list should read “SR 1 / SR 30 – new grade separated intersection” (emphasis added).
- Similarly, on the map on page 50, please change item C to read “New grade-separated intersection.” The terms are important with respect to Clean Air Act compliance. Also, the labels for SR 30 are misplaced. The route follows Cedar Creek Road, not Wilkins Road, south of where they intersect.
- On page 51, in the fifth bullet point, the correct name of the program is “Complete Streets.”

- On page 52, there is an Editor’s Note regarding the possible need for additional transportation model runs. Consultation between the City, the Office of State Planning Coordination and DelDOT is continuing in this regard.
- The list of roadway upgrades on page 60 (repeated in Table 8.2) is incomplete in that it is focused east of SR 1. There are also roads west of SR 1 in the study area that need to be upgraded, notably Wilkens Road and Elks Lodge Road south of Wilkens Road.
- On page 62, in the first bulleted recommendation, the City’s role is noticeably absent from the discussion of creating a Transportation Investment District. In our experience, these districts work best where the local government is an active partner, and often the leading partner, in coordinating developer participation in infrastructure construction. We offer the Westown development in Middletown as a good example.
- In Chapter 10, Design Guidelines, found on pages 68 and 69, we identified three errors in style:
  - Guidelines 1 and 2 refer to “the Department” without specifying what department is meant. We believe the Delaware Department of Natural Resources and Environmental Control is intended, but that should be stated.
  - In Guidelines 9c and 10b, the phrase “We recommend” appears. Who are “We”?
  - Guideline 11 has a part a but not a part b.

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

DNREC offers several comments and suggestions to improve conservation and protection of the Town’s resources. DNREC would welcome the opportunity to meet with the Town in a collaborative manner to discuss these recommendations and possible future ordinances.

- **General Comment.** The Master Plan clearly outlines the ecological importance of the Cedar Creek Natural Area and Cedar Creek Nature Preserve.

*Recommendation:* To take protection of the Natural Area one step further, we would encourage re-zoning the area that includes the Cedar Creek Natural Area from ‘Low-Density Residential’ to ‘Protected.’

*Recommendation:* Provide buffers to the Cedar Creek Natural Area and the Cedar Creek Nature Preserve. Prohibit additional development within 300 feet of the existing Natural Area.

*Recommendation:* Do not place storm water structures, *including storm water outfalls*, in the Cedar Creek Natural Area. Vegetation in riparian areas act as a buffer protecting stream banks from erosion, supports high quality habitat, and protects water quality. Large outflows of water can disrupt the benefits of natural vegetation and can ultimately be detrimental to the ecosystem. Removal of vegetation for the placement of storm water structures and outfalls should be prohibited within the Cedar Creek Natural Area.

- **Chapter 8, Transportation Plan, Second paragraph.** The Master Plan also seeks to ensure that new residential and commercial growth within the study area encompasses the goals and objectives of good planning practice including:

More efficient and land use

Farmland Preservation

Greater variety in housing types and affordability

More bicycle and pedestrian facilities and connections

Transit Opportunities

*Recommendation:* Good planning practices also address the natural resources within a designated planning area. As such, “Natural Resource Preservation” should be included in the above list.

- **Chapter 10, Design Guidelines.** In addition to a forested buffer requirement, the Department also asks that the City work with developers on where they ‘mass’ their houses or buildings. Whenever practicable, the Department requests that the City require developers to cluster their approved building lots, and place as much of the residual community open space near adjacent farm parcels. This would further help eliminate or mitigate any conflict that may arise from dissimilar land uses.

*Recommendations:*

1. It is assumed that ‘the Department’ noted above is the Department of Agriculture. Since various Departments have provided comments to this Plan, for clarity, the individual Departments should be specifically identified throughout Chapter 10.
2. Placement of open space should be evaluated on a site by site basis with preference given to protecting the existing natural resources.
3. DNREC supports buffering the residential area from adjacent agricultural areas to mitigate conflicts. If active recreational open space is planned, it will be better placed in a more centralized location. Locating active areas/green spaces as a central piece not only allows easy access for all residents, but also promotes safety and active lifestyles but also promotes community cohesion.

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

- The Department of Education requests that the City of Milford coordinate with the Milford School District and as this plan continues to develop, lands should be identified and dedicated for school locations with the Milford School District involvement.

**Dover/Kent MPO – Contact: Jim Galvin 302-387-6030**

With the exception of these few comments, the Dover/Kent MPO supports the Neighborhood Master Plan process and results. They encourage the City to implement the Plan as conceived, including application of the Complete Streets policy in the neighborhood and the Transfer of Development Rights (TDR) areas.

The project was an attempt of the City to analyze this portion and determine an acceptable, if inevitable, land use pattern. The resulting plan identifies areas appropriate for residential, commercial, passive and active open space areas, as well as a special use, Innovation district.

- The 2011 Capital Transportation Program includes funding for a Grade Separated Intersection where DE 30 meets DE 1. This should be the primary connection between east and west sides of DE 1 in Milford. There is also funding for development of a grade separated intersection at N.E. Front Street at DE 1 for plans, engineering and acquisition. There was no construction funding allocated through FY 2016. This is remote from the study area and separated by a creek.
- Study area road improvements have been identified in the plan. The MPO would like to be part of a team, if one is created, that discusses the extent and range of the TID's and the distribution formulas. The experience in the City of Milford will inform other potential efforts across the County and State.
- Every opportunity should be provided the residents of the area to safely cross DE 1. The default should be the grade separated intersections at DE 30 and all development in the area interconnected with a street grid that allows residents to travels from the Sharps Road parcels and Bucks Road parcels to Cedar Neck Road and the grade separated intersection. The area should include sidewalks for pedestrian access and facilities for bicycle travel throughout. It will be particularly important in the area of and access to the Innovation Park as well as the commercial center on Wilkins Road but should not be limited to the corridor.

PLUS review – 2011-06-01

Page 5 of 5

Once all changes have been considered and the master plan has been adopted by the City of Milford, please forward a copy of the finalized plan to our office.

Thank you for the opportunity to review this project. 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, Office of State Planning Coordination