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

March 25, 2026

Solutions IPEM
Attn: Jim Eriksen
302 N Bedford St,
Georgetown, DE 19947

RE: PLUS Review – 2026-02-05; Knight Crossing

Dear Mr. Eriksen:

Thank you for meeting with State agency planners on March 4, 2026, to discuss Knight Crossing. According to the information received, you are seeking review of a proposed site plan of a mixed-use development featuring townhomes and mixed-use buildings.

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 developers will also need to comply with any Federal, State, and local regulations regarding this property. We also note that the City of Milford is the governing authority over this land, the developers will need to comply with any and all regulations/restrictions set forth by the city.**

Strategies for State Policies and Spending

According to the 2025 Strategies for State Policies and Spending, this project is located in Levels 1 and 2 investment areas with a small portion of the site located in a Level 3 investment area. The proposed site plan shows the proposed improvements are concentrated in Level 1, with a portion in Level 2. The Level 3 portion of the site is completely within the water features and therefore not part of the proposed development. This site is located within the City of Milford and is consistent with its comprehensive plan.

Investment Level 1 reflects areas that are already developed in an urban or suburban fashion, where infrastructure is existing or readily available, and where future redevelopment or infill projects are expected and encouraged by State policy. Investment Level 2 reflects areas where growth is anticipated by local, county, and State plans in the near-term future. Because development in Levels 1 and 2 is consistent with the 2025 Strategies for State Policies and Spending, the Office of State Planning Coordination supports the proposed site plan.

Code Requirements/Agency Permitting Requirements

Department of Transportation – Contact Stephen Bayer 302-760-4834

- Both Cedar Beach Road and Beaver Dam Road are state-owned and state-maintained roads. As such, any access point onto them must be designed in accordance with DelDOT's Development Coordination Manual, which is available at http://www.deldot.gov/Business/subdivisions/index.shtml?dc=changes.

- Pursuant to Section 1.3 of the Development Coordination Manual, a Pre-Submittal Meeting is required before plans are submitted for review. The form needed to request the meeting and guidance on what will be covered there and how to prepare for it is located at https://www.deldot.gov/Business/subdivisions/pdfs/Meeting_Request_Form.pdf?08022017.

- Section 1.7 of the Development Coordination Manual addresses fees that are assessed for the review of development proposals. DelDOT anticipates collecting the Initial Stage Fee when the record plan is submitted for review and the Construction Stage Fee when construction plans are submitted for review.

- In terms of traffic analysis and based on the expected trip generation this project will require a Traffic Impact Study (TIS). As discussed in the PLUS meeting an initial meeting has been scheduled to begin this process. Please continue to work with our office to identify necessary frontage and/or offsite improvements.

- As necessary, in accordance with Section 3.2.5 and Figure 3.2.5-a of the Development Coordination Manual, DelDOT will require dedication of right-of-way along the site's frontage with Cedar Beach Road and Beaver Dam Road. By this regulation, this dedication is to provide a minimum of 30 feet of right-of-way from the physical centerline. The following right-of-way dedication note is required, "**An X-foot wide strip of right-of-way from the centerline is hereby dedicated in fee simple to the State of Delaware, acting by and through the Delaware Department of Transportation."**

- In accordance with Section 3.2.5.1.2 of the Development Coordination Manual, DelDOT will require the establishment of a 15-foot wide permanent easement across the property frontages on Cedar Beach Road and Beaver Dam Road. The location of the easement shall be outside the limits of the ultimate right-of-way. The easement area can be used as part of the open space calculation for the site. The following note is required, "**A 15-foot wide permanent easement is hereby dedicated in fee simple to the State of Delaware, acting by and through the Delaware Department of**

Transportation."

- Referring to Section 3.4.2.1 of the Development Coordination Manual, the following items, among other things, are required on the Record Plan:
    - A Traffic Generation Diagram. See Figure 3.4.2-a for the required format and content.
    - Notes identifying the type of off-site improvements, agreements (signal, letter) contributions and when the off-site improvements are warranted.
- In accordance with Section 3.8 of the Development Coordination Manual, storm water facilities shall be located a minimum of 20 feet from the ultimate State right-of-way along all frontage roads.
- Section 3.5.4.2 of the Development Coordination Manual addresses requirements for Shared Use Paths (SUP) and sidewalks. For projects in Level 1 Investment Areas, installation of paths or sidewalks along the frontage on State-maintained roads is required. Because the frontage areas of roads involved with this project are in Investment Level 1 we anticipate requiring sidewalk or shared use path.
- In accordance with Section 5.2.9 of the Development Coordination Manual, the Auxiliary Lane Worksheet should be used to determine whether auxiliary lanes are warranted at the site entrances and how long those lanes should be. The worksheet can be found at http://www.deldot.gov/Business/subdivisions/index.shtml.
- In accordance with Section 5.4 of the Development Coordination Manual, sight distance triangles are required and shall be established in accordance with American Association of State Highway and Transportation Officials (AASHTO) standards. A spreadsheet has been developed to assist with this task. It can be found at http://www.deldot.gov/Business/subdivisions/index.shtml.
- In accordance with Section 5.14 of the Development Coordination Manual, all existing utilities must be shown on the plan and a utility relocation plan will be required for any utilities that need to be relocated.
- The project has frontage along the Delaware Bayshore Byway. Delaware State Code Title 17, Chapter 1, Sections 190-194 and Title 17, Chapter 11, Sections 1101-1120 with applicable amendments apply. Specifically:

- No new billboards, variable message boards, or electronic changing message sign(s) anywhere on or off Cedar Branch Road. Any such structure or fixture shall be 660 feet away, i.e., any closest byway right-of-way edge.

- No off-premises advertising on the property for others within 660 feet of Cedar Branch Road, e.g., displaying on-site the bank/financial institution funding the project or the contractor building the project.

DART First State – Contact Jared Kauffman 302-576-6062

- DART doesn't have any transit infrastructure comments.
- It is recommended that covered bicycle parking be provided.

Department of Natural Resources and Environmental Control – Contact Beth Krumrine 302-735-3480

Staff from the Delaware Department of Natural Resources and Environmental Control (DNREC) reviewed the project submitted for PLUS review. The absence of comments regarding specific resources does not indicate that there are not additional constraints or environmental issues on site, nor does it indicate DNREC support of a project. Developers and municipal officials are encouraged to reach out to Beth Krumrine at (302) 735-3480 or Beth.Krumrine@delaware.gov if they have any specific requests for information.

Potential Public Health and Safety Hazards

The site design poses risk due to flooding and sea level rise. The preliminary plan shows two mixed-use, apartment buildings and internal roadways occurring directly within the 100-year floodplain. Over the 30-year mortgage period, sea level rise coupled with an increased frequency of intense rainfall is expected to expand the area of the floodplain in this region and exacerbate existing flooding occurring on this site.

Requirements Identified Within the Development Footprint

Current or Previous Contamination

DNREC records indicate that contamination has occurred in parcel 330-7.00-13.00, a formerly used Defense Site known as the Milford Ordinance Plant (ID DE-1311). A site investigation has been conducted, to date. A separate site was created for Milford Marina (ID DE-1871) which includes parcels 330-7.00.13.00 and 330-7.00-83.00 only.

- Contact the DNREC Remediation Section to determine any other requirements associated with the site.

Contact: Division of Waste and Hazardous Substances Remediation Section at (302) 395-2600. Website: https://dnrec.delaware.gov/waste-hazardous/remediation/

Underground Storage Tank

Based on DNREC records, an Underground Storage Tank has been identified on the site north of Cedar Beach Road (Parcel #330-7.00.13.00), identified as Mispillion Marina (ID 5-000379). A letter, stating no further action, was issued in May of 1999. An investigation report was submitted and reviewed by DNREC. Analytical results at that time indicate non-detectable concentrations of petroleum hydrocarbons in soil samples obtained from borings installed outside the former tank field, which pose no threat to human health or the environment and no further action is required at the present time. These comments do not absolve the Responsible Party from the responsibility for any future problems related to the storage tank at this location.

- If any indication of a Release of a Regulated Substance from a tank is discovered, the Responsible Parties shall report it within 24 hours: 24-hour Release Hot Line, (800) 662-8802.

Contact: Division of Waste and Hazardous Substances Remediation Section at (302) 395-2600. Website: https://dnrec.delaware.gov/waste-hazardous/remediation/

Recycling

The Compliance and Permitting Section would like to remind commercial and residential property managers that they must comply with Delaware's Universal Recycling Regulations by providing recycling services to their tenants.

- Also, the commercial sector is required to participate in a comprehensive recycling program. Regulations can be found at: https://regulations.delaware.gov/AdminCode/title7/1000/1300/1305.shtml

- Accommodate adequate size for the trash and recycling dumpsters needed to service the commercial space and residential apartments. Take into account the ability of trash trucks to service those containers. Information on what is acceptable to place in the recycling dumpster can be found at de.gov/recycling.

Contact: Division of Waste and Hazardous Substances Compliance and Permitting Section at (302) 395-2600. Website: https://dnrec.delaware.gov/waste-hazardous/

Special Flood Hazard Area
Mixed-use buildings that include dwelling apartments and internal roadways are proposed directly within a Special Flood Hazard Area within the mapped 100-year floodplain (1% annual chance of flooding), along with what appears to be three stormwater management areas (unlabeled on site plans). The Special Flood Hazard Area identified on the site lies within zone AE. In lands contained within the 100-year floodplain, the National Flood Insurance Program's floodplain management regulations must be enforced through the local floodplain ordinance, which can have higher standards.

Buildings and parking areas are also proposed within the moderate risk floodplain, or 500-year floodplain (0.2% annual chance of flooding).

- The applicant must comply with the local floodplain ordinance and regulations applicable to development or construction within the 100-year floodplain. In determining the boundary of the floodplain, use the most recent FIRM maps available, which can be found at https://floodplanning.dnrec.delaware.gov/

- If fill is to be placed in floodplain to increase grade elevation to raise proposed development out of the mapped floodplain, the applicant must work with the local community floodplain authority to initiate a Certified Letter of Map Revision – Fill (CLOMR-F) request. A CLOMR-F request should be submitted to FEMA for review followed by an application to FEMA for a Letter of Map Revision (LOMR) at completion. Please note that a property will not be officially recognized by FEMA as being located out of the mapped floodplain until a LOMR has been issued. To determine the community floodplain authority for this proposal, please contact DNREC's Shoreline and Waterway Management Section.

Contact: DNREC Shoreline and Waterway Management Section at (302) 608-5500.
Website: https://dnrec.delaware.gov/watershed-stewardship/waterways/floodplains/

Stormwater Management
The project proposes greater than 5,000 square feet of land disturbing activities and will be subject to Delaware's *Sediment and Stormwater Regulations*.

- A Sediment and Stormwater Plan must be developed, then approved by the appropriate plan review agency, prior to any land disturbing activity taking place on the site. For this

project, the plan review agency is the Sussex Conservation District.

- Additionally, to address federal requirements, construction activities that exceed 1.0 acre of land disturbance require Construction General Permit coverage through submittal of an electronic Notice of Intent for Stormwater Discharges Associated with Construction Activity. This form must be submitted electronically https://enoi.dnrec.delaware.gov/, (select Construction Stormwater General Permit) to the DNREC Division of Watershed Stewardship, along with the $195 fee.

- Schedule a project application meeting with the appropriate plan review agency prior to moving forward with the stormwater and site design. As part of this process, you must submit a Stormwater Assessment Study.

Plan review agency contact: Sussex Conservation District at (302) 856-2105 or (302) 856-7219. Website: https://www.sussexconservation.org/

General Stormwater contact: DNREC Sediment and Stormwater Program at (302) 739-9921.
E-mail: DNREC.Stormwater@delaware.gov.
Website: https://dnrec.delaware.gov/watershed-stewardship/sediment-stormwater/

Wetlands and Waterways

Maps from the Statewide Wetlands Mapping Project indicate the presence of tidal wetlands and isolated, nontidal wetlands (located between Cedar Beach Road and Beaver Dam Road). The application indicates that wetlands have not been delineated.

State Requirements:

- If plans change, state permits from the DNREC Wetlands and Waterways Section may be required for disturbance proposed in state jurisdictional wetlands and waterways. To apply for a permit online, please visit their website at https://dnrec.delaware.gov/water/wetlands-subaqueous/permits/.

State Contact: DNREC Wetlands and Waterways Section at (302) 739-9943.
Website: https://dnrec.delaware.gov/water/wetlands/

Federal Requirements:

- Federal permits from the U.S. Army Corps of Engineers will be necessary if dredge or fill is proposed in tidal wetlands. A delineation of waterways and wetlands may also be required. In certain cases, permits from the US Army Corps of Engineers may trigger additional certifications from DNREC (Coastal Zone Federal Consistency Certification and 401 Water Quality Certification). Work with the US Army Corps of Engineers to determine the appropriate federal permitting requirements.

Federal Contact: U.S. Army Corps of Engineers (Dover Office) at (267) 240-5278.
Website: https://www.nap.usace.army.mil/Missions/Regulatory/Contacts/

Coastal Zone Federal Consistency Certification (state contact): DNREC Coastal Management Program at (302) 739-9283.
Website: https://dnrec.delaware.gov/coastal-programs/coastal-management/

Federal Consistency Review
Please note that federal consistency review by the Delaware Coastal Management Program (DCMP) may be required for other federal agency license/permit applications. See Section 3.2 of the DCMP Policies and Procedures document for the list of federal license and permit activities requiring federal consistency certification (de.gov/fedcon).

Coastal Zone Federal Consistency Certification (state contact): DNREC Coastal Management Program at (302) 739-9283.
Website: https://dnrec.delaware.gov/coastal-programs/coastal-management/

Wastewater Disposal Systems – Large Systems
For wastewater conveyance offsite by way of a new sewer connection, flow rates exceeding 2,500 gallons of liquid waste per day will require a Wastewater Pollution Collection and Conveyance (WPCC) permit from the Commercial and Government Services section.

Contact: Division of Waste and Hazardous Substances Remediation Section at (302) 395-2600. Website: https://dnrec.delaware.gov/waste-hazardous/remediation/

Expired Septic Permit
An expired permit (permit # 822-94S and C1667-89S) exists for Parcel Id: 330-7.00-83.00 in the Small System Branch database.

- Contact the DNREC Commercial and Government Services Section to discuss requirements for properly abandoning these systems.

Contact: DNREC Commercial and Government Services Section at (302) 739-9947
Website: https://dnrec.delaware.gov/water/groundwater/septic-systems/

Electric Vehicle Charging Requirements

Electric vehicle charging infrastructure is now required for all residential dwellings in Delaware (see 80 Del. Laws, c. 145 § 8001- § 8006) for which:

- A building permit is issued on or after January 1, 2024 (single family), or
- The final site plan is approved on or after January 1, 2025 (multi-family).

Requirements are summarized below. Consult the Delaware Code directly for further details.

Single-family Dwellings, effective 2024:

- The developer of a single-family residential dwelling shall install at least one electric vehicle capable parking space at each single-family residential dwelling constructed.
- If the single-family residential dwelling does not have an attached or detached garage, an electric vehicle capable parking space must be provided in the driveway, assigned parking space for the dwelling, or at an unassigned non-street residential parking space constructed as part of the project.

Delaware Department of Agriculture – Milton Melendez 302 698-4534

- The Delaware Department of Agriculture has no restrictive comments regarding this PLUS project.

Delaware Emergency Management Agency – Contact Phillip Cane 302-659-2325

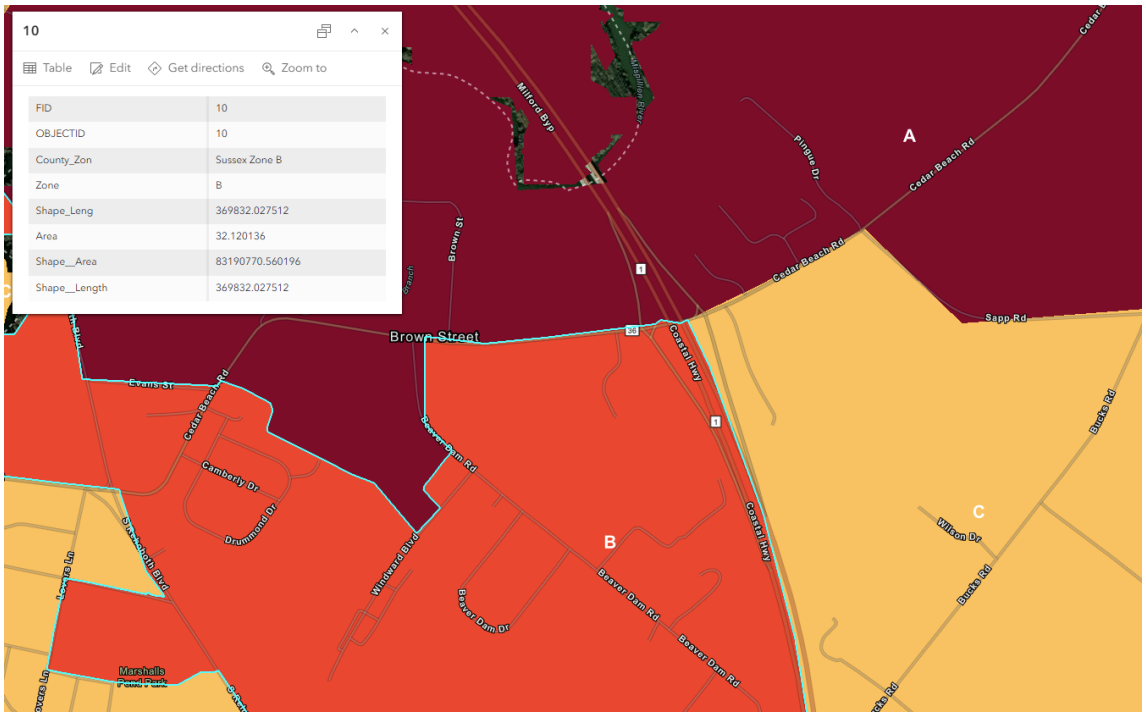
Proposed Project Parcel Flood Concern

- The majority of this parcel is located within an area of **Minimal Flood Concern of 1,000 years or greater**, especially the southern-section of the project; however, there is a 100-year floodplain or 1% annual chance flood zone surrounding the northern property (north of Cedar Beach Road). Some of the apartment facilities on the ground level appear to be within the flood zone.



Parcel Status within County Evacuation Zone Location

- For the portion of the parcel south of cedar beach road, that falls inside Evacuation Zone B, whereas the northern portion is located within Sussex County's Evacuation Zone A.



Parcel Status within the 10-mile Emergency Planning Zone (EPZ) for the Salem Nuclear Power Plant

- The parcel **is not** located within the 10-mile EPZ for the Salem Nuclear Power Plant.

State Historic Preservation Office – Contact Carlton Hall 302-736-7400

- There are no known archaeological sites in the project area or known National Register-listed or eligible properties on the parcel. However, there is a documented 20th century house named the Sweet Potato House S03738 on the adjacent parcel 330-7.00-85.00. The house appears to be at least 50 years old, which would meet minimum age requirements to be considered eligible for listing in the National Register of Historic Places. The dwelling was not documented by our office and was not in our inventory prior to this Preliminary Land Use (PLUS) Meeting.

- The site is associated with at least one historic agricultural complex, along with having a high potential for precontact archaeological resources. The Delaware State Historic Preservation Office recommends an archaeological survey prior to any ground disturbing activities. Historic agricultural complexes are often associated with cemeteries and unmarked graves. Our office requests that the applicant be aware of the Unmarked Human Graves and Skeletal Remains Law. If federal funding, permits, or permissions are required for this project, please let us know as soon as possible.

- If there are any questions, inquiries, or concerns, feel free to contact the Delaware State Historic Preservation Office for assistance at 302-736-7400.

Delaware State Fire Marshall's Office – Contact Duane Fox 302-739-4394

At the time of formal submittal, the applicant shall provide; completed application, fee, and three sets of plans depicting the following in accordance with the Delaware State Fire Prevention Regulation (DSFPR):

Fire Protection Water Requirements:

- Water distribution system capable of delivering at least 1,500 gpm for 2-hour duration, at 20-psi residual pressure is required. Fire hydrants with 800 feet spacing on centers. (Mercantile -mixed use)

- Water distribution system capable of delivering at least 1,000 gpm for 1-hour duration, at 20-psi residual pressure is required. Fire hydrants with 800 feet spacing on centers. (Apartments, Assembly and Townhouses)

- Where a water distribution system is proposed for single-family dwellings, it shall be capable of delivering at least 500 gpm for 1-hour duration, at 20-psi residual pressure. Fire hydrants with 800 feet spacing on centers are required. (One & Two- Family Dwelling)

- One- and Two-Family dwellings, including townhouses and duplexes, are required by law to offer the homeowner an automatic sprinkler system, therefore infrastructure should accommodate water needs.

- Where a water distribution system is proposed for the site, the infrastructure for fire protection water shall be provided, including the size of water mains for fire hydrants and sprinkler systems.

Fire Protection Features:

- All structures over 10,000 sq. ft. aggregate will require automatic sprinkler protection installed.

- Buildings greater than 10,000 sq. ft., 3-stories or more, over 35 feet, or classified as High Hazard, are required to meet fire lane marking requirements

- Show Fire Department Connection location (Must be within 300 feet of fire hydrant), and detail as shown in the DSFPR.

- Show Fire Lanes and Sign Detail as shown in DSFPR.

- For townhouse buildings, provide a section / detail and the UL design number of the 2-hour fire rated separation wall on the Site plan.

- Any work done to the existing marina will require standpipe to be installed to provide fire protection at the boat slips. Fire hydrant layout and infrastructure should be considered for future use.

Accessibility

- All premises, which the fire department may be called upon to protect in case of fire, and which are not readily accessible from public roads, shall be provided with suitable gates and access roads, and fire lanes so that all buildings on the premises are accessible to fire apparatus. This means that the access road to the subdivision from Cedar Beach Road and Beaver Damn Road must be constructed so fire department apparatus may negotiate it.

- Fire department access shall be provided in such a manner so that fire apparatus will be able to locate within 100 ft. of the front door.

- Any dead-end road more than 300 feet in length shall be provided with a turn-around or cul-de-sac arranged such that fire apparatus will be able to turn around by making not more than one backing maneuver. The minimum paved radius of the cul-de-sac shall be 38 feet. The dimensions of the cul-de-sac or turn-around shall be shown on the final plans. Also, please be advised that parking is prohibited in the cul-de-sac or turn around.

- The use of speed bumps or other methods of traffic speed reduction must be in accordance with Department of Transportation requirements.

- The local Fire Chief, prior to any submission to our Agency, shall approve in writing the use of gates that limit fire department access into and out of the development or property.

Gas Piping and System Information:

- Provide type of fuel proposed and show locations of bulk containers on plan.

Required Notes:

- Provide a note on the final plans submitted for review to read “All fire lanes, fire hydrants, and fire department connections shall be marked in accordance with the Delaware State Fire Prevention Regulations”

- Proposed Use

- Alpha or Numerical Labels for each building/unit for sites with multiple buildings/units

- Square footage of each structure (Total of all Floors)

- National Fire Protection Association (NFPA) Construction Type

- Maximum Height of Buildings (including number of stories)

- Townhouse 2-hr separation wall details shall be shown on site plans

- Note indicating if building is to be sprinklered

- Name of Water Provider

- Letter from Water Provider approving the system layout

- Provide Lock Box Note (as detailed in DSFPR) if Building is to be sprinklered

- Provide Road Names, even for County Roads

Recommendations/Additional Information

This section includes a list of site-specific suggestions that are intended to enhance the project. These suggestions have been generated by the State Agencies based on their expertise and subject area knowledge. **These suggestions do not represent State code requirements.** They are offered here in order to provide proactive ideas to help the applicant enhance the site design, and it is hoped **(but in no way required)** that the applicant will open a dialogue with the relevant agencies to discuss how these suggestions can benefit the project.

Department of Transportation – Contact Stephen Bayer 302-760-4834

- The applicant should expect a requirement that all PLUS and Technical Advisory Committee (TAC) comments be addressed prior to submitting plans for review.

- Please be advised that the Standard General Notes have been updated and posted to the DelDOT website. Please begin using the new versions and look for the revision dates of March 21, 2019 and March 16, 2021. The notes can be found at https://www.deldot.gov/Business/subdivisions/

- This location is within Levels 1, 2, and 3 according to Delaware Strategies for State Policies and Spending (SSPS) with the majority being in Investment Levels 1 and 2. Any future development of this location is encouraged to be in alignment with DelDOT goals. In Investment Level 1 areas DelDOT prioritizes improving safety; expanding access to transit, pedestrian, and bicycle facilities; supporting economic development; and strengthening connections among existing, redeveloping, and new neighborhoods, public facilities, and commercial areas. In Investment Level 2 areas DelDOT prioritizes improving safety; expanding access to transit, pedestrian, and bicycle facilities; supporting economic development; and improving connections among existing, redeveloping, and new neighborhoods, public facilities, and commercial areas, consistent with local growth forecasts. This project is in alignment with those goals.

- The functional classification of Beaver Dam Road is local. Local roads provide direct access to abutting land and access to higher-order systems. This project is generally in alignment with that function. The functional classification of Cedar Beach Road is minor arterial. Minor arterial roads provide service for trips of moderate length and service areas that are smaller than higher arterial roadways. This project is also generally in alignment with that function.

Department of Natural Resources and Environmental Control – Contact Beth Krumrine 302-735-3480

Flooding and Sea Level Rise

The site design poses risk due to flooding and sea level rise. The preliminary plan shows two mixed-use apartment buildings and internal roadways occurring directly within the 100-year floodplain. The plan shows a building proposed within the 500-year (0.2% annual chance) floodplain. Lots near the current floodplain are vulnerable to intermittent or routine flooding episodes due to the combined effects of climate driven sea level rise and heavy precipitation events.

According to the newest 2025 projections, by 2100, mean sea levels are projected to rise by 2.5 – 5.2 feet relative to 2000 levels. As mean sea levels rise, the frequency and severity of tidal flooding events is expected to increase, and permanent inundation is projected to occur.

- Locate all permanent structures outside of the floodplain, including stormwater management areas.

- Do not build roadways in the floodplain which are essential for first responders in the event of an emergency. Roadways in the floodplain could become impassable during major flooding events. Safe access to such locations should be ensured at all times.

Floodplain Contact: DNREC Shoreline and Waterway Management Section at (302) 608-5500. Website: https://dnrec.delaware.gov/watershed-stewardship/waterways/floodplains/

Sea Level Rise Contact: DNREC Climate and Sustainability Section at (302) 735-3480. Website: https://dnrec.delaware.gov/coastal-programs/planning-training/adapting-to-sea-level-rise/

Stormwater Management

- Where the site and soil conditions allow, integrate runoff reduction techniques including infiltration basins, bioretention (rain gardens), filter strips, and pavers to encourage on-site stormwater infiltration and reduce runoff.

- For improved stormwater management, preserve existing trees, wetlands, and passive open space.

Plan review agency contact: Sussex Conservation District at (302) 856-2105 or (302) 856-7219. Website: https://www.sussexconservation.org/

General stormwater contact: DNREC Sediment and Stormwater Program at (302) 739-9921.
E-mail: DNREC.Stormwater@delaware.gov.
Website: https://dnrec.delaware.gov/watershed-stewardship/sediment-stormwater/

Drainage

- All existing drainage ditches on the property should be evaluated for function and cleaned, if needed, prior to the construction of the project.

- Environmental permits or exemptions may be required by the County Conservation District (Standard Plan), the DNREC Sediment and Stormwater Program (eNOI/NOT), Army Corp of Engineers, and/or DNREC Wetlands and Waterways Section prior to clearing and/or excavating ditch channels.

- All precautions should be taken to ensure the project does not hinder any off-site drainage upstream of the project or create any off-site drainage problems downstream by the release of on-site storm water.

Contact: DNREC Drainage Program at (302) 855-1930
Website: https://dnrec.delaware.gov/drainage-stormwater/

Forested Wetlands

Maps from the Statewide Wetlands Mapping Project indicate the potential presence of forested wetlands on the southern portion of the site. This habitat type is known to support an array of plants and animals, most notably wetland dependent species such as amphibians.

To reduce impacts to these species, the following is recommended:

- Do not disturb forested wetlands. Increase an upland buffer of at least 100 feet along all wetlands, waterways, and sensitive habitats, except tax ditches, including those containing existing forest or natural vegetative cover.

- Vegetated buffer zones should be identified outside of the Limit of Disturbance on the engineering plans.

- Maintain vegetated buffer zones as native species meadows or forest.

- Vegetated buffer zones should be deeded as community open space and not contained within any lot lines. Signage should be installed at the edge and within the buffer zones to deter residents from encroaching into these common areas.

- Maintain habitat connections to undeveloped open space, which are especially important for species movement across the landscape.

Contact: DNREC Division of Fish and Wildlife, Species Conservation and Research Program at (302) 735-3600. Website: https://dnrec.delaware.gov/fish-wildlife/conservation/

Delaware Ecological Network

The forested area on this site occurs within the Delaware Ecological Network, a statewide network of interconnected lands having significant ecological value. This GIS data layer helps to identify and prioritize areas for natural resource protection, including forests, wetlands, streams, and high-quality habitat for rare plants and animals.

Recommendations:

- Avoid disturbance within these habitats to maintain the naturally occurring landscape and connectivity of priority wildlife habitats.
- In general, larger, connected areas of natural habitat are more beneficial to wildlife, allowing for safer movement and migration from one area to another and reducing roadway mortality.

Contact: DNREC Wildlife Species Conservation and Research Program at (302) 735-3600. Website: https://dnrec.delaware.gov/fish-wildlife/contact-information/

Sustainable Practices

- To improve public safety and the wellbeing of future residents, follow all comments above regarding flooding and sea level rise.

- Incorporate nonmotorized connectivity and install bicycle racks where feasible to help facilitate non-vehicular travel modes.

- Install solar in mixed-use buildings with apartments and offer the option for solar in town houses. This allows a purchaser to incorporate the cost into their mortgage, making it more affordable. For community facilities, consider using renewable energy infrastructure such as solar to reduce energy costs and further reduce pollution created

from offsite generation. Grant funds and incentives are available for Delmarva Power customers through the DNREC Green Energy Fund, which includes several funding types through the state's major electric utilities (https://dnrec.delaware.gov/climate-coastal-energy/renewable/assistance/).

- Consider planting select areas with native trees. Native trees improve air, water, and soil quality. Planting and nurturing trees is also a nature-based solution to reducing the greenhouse gases that drive climate change. In addition, native trees have an increasingly important role in the survival of native birds and beneficial insects whose habitat is shrinking due to development and climate change.

- Consider planting select areas with meadow comprised of native species. Native plants are well-suited to our climate and require limited maintenance. Mowing in these areas should not occur between April 1st to July 31st to reduce impacts to nesting birds and other wildlife species that utilize meadows and grasslands for breeding habitat.

- Use efficient Energy Star rated products and materials in construction and redevelopment. Energy efficient appliances use less energy over time. This saves consumers and businesses money, while also helping to reduce pollution from power generation.

- Use structural paint coatings that are low in Volatile Organic Compounds to help protect air quality. Air pollution from new construction is generated through the use of maintenance equipment, paints, and consumer products like roof coatings and primers.

- Use recycled materials, such as reclaimed asphalt pavement, to reduce heat island effects on paved surfaces, prevent landfill waste, and lower material costs.

Contact: DNREC Division of Climate, Coastal & Energy at (302) 735-3480.
Website: https://dnrec.delaware.gov/climate-coastal-energy/

Delaware Emergency Management Agency – Contact Phillip Cane 302-659-2325

Population

- The county has a population density of 265.60 persons per square mile based on the US 2020 Census report; an increase from 2010 at 208.90 persons per square mile. The specific census block(s) the project is located on has a total population of 0 persons

though, with development, this will undoubtedly change. The 14 adjacent blocks aggregated bring the area to a total population of 154 persons.

FEMA National Risk Index

- The FEMA National Risk Index is an online mapping application that identifies communities most at risk to 18 natural hazards: Avalanche, Coastal Flooding, Cold Wave, Drought, Earthquake, Hail, Heat Wave, Hurricane, Ice Storm, Landslide, Lightning, Riverine Flooding, Strong Wind, Tornado, Tsunami, Volcanic Activity, Wildfire, and Winter Weather. The FEMA National Risk Index is calculated by multiplying the Expected Annual Loss times the Social Vulnerability and dividing that by the Community Resilience.



- According to FEMA's National Risk Index, the parcel **is** considered **relatively high** for overall natural hazards risks.

- Community Resilience is a consequence reduction risk component and a community risk factor that represents the ability of a community to prepare for anticipated natural hazards, adapt to changing conditions and withstand/recover rapidly from disruptions. Social Vulnerability is a consequence-enhancing risk factor that represents the susceptibility of social groups to the adverse impacts of natural hazards.

- Its community resilience and social vulnerability are both rated as **relatively moderate.**

Renewable Energy Commitment

- Regarding energy use and consumption, the census tract utilizes **electricity** as the predominant fuel type for heating purposes.

- DEMA strongly encourages the use of renewable energies and high-efficiency appliances and utilities. Regarding utilities, DEMA suggests incorporating 90% series furnaces/HVAC systems; the closer to 99%, the better, as well as A/C units of 20 Seer or greater. DEMA recommends using tankless water heaters, and battery backup systems for sump pumps to reduce potential water damage from power failure. Lastly, DEMA encourages the integration of modern and emerging technologies, such as the potential for electric vehicles in garages/parking lots, green roofs or solar panels where applicable and allowable, and the like.

- In reference to the flood zones, DEMA strongly discourages construction of any type directly within, adjacent to or within proximity to a 100-year floodplain as water knows no bounds. If the homes are being constructed at flood level or below and a mortgage is obtained, an NFIP insurance policy is also required. Regardless of whether within or adjacent to a floodplain, should construction continue, we recommend utilizing additional mitigation strategies to reduce the risk from flooding. This could include, but isn't limited to, wet/dry floodproofing, elevating the home out of the flood plain, elevating mechanicals/HVAC/Electricity out of the flood waters, mass notification systems, large drainage systems (increased diameter pipes, ditches, basins, etc.) and other similar methods.

- Lastly, in reference to the county evacuation zones, DEMA encourages this information be made readily available to any and all persons residing there. This can be done simply through pamphlets or a neighborhood sign.

Delaware State Housing Authority - Contact Rachel Alfano (302) 739-4263

- This project is in a Stable area according to DSHA's Housing Reform Map. This map shows the distribution of affordable housing throughout the state. Stable areas are where we want a balance of market rate and subsidized housing to be supported. Over 20 percent of all housing units within the area are affordable housing and they carry too much of the collective housing inventory. The diverse housing types (multifamily, duplex, and townhomes) with ownership and rental options make this a suitable living space for various income levels. In addition, the commercial space and sidewalks make an easy access to amenities. As there is a housing crisis here in Delaware, we support this project as it contributes positive additions and growth to the state.

Delaware State Fire Marshall's Office – Contact Duane Fox 302-739-4394
Preliminary meetings with fire protection specialists are encouraged prior to formal submittal. Please call for appointment. Applications and brochures can be downloaded from our website: www.statefiremarshal.delaware.gov, technical services link, plan review, applications or brochures.

Fire Department Comments:

- The volunteer fire department is obligated to provide Fire and EMS service to this property. In addition, new developments in their Fire and EMS district have put a financial strain on their volunteer fire service. As their call volume increases yearly due to the unprecedented growth within the service area, current funding does not keep up with development within the district. State, County, and Local funding does not keep up with the growth of the fire district, so the developer and future residents need to help financially support the Volunteer Fire Department. Future residents need to consider

joining the fire department to serve their new community. The local fire company is expanding and providing a station in less than two miles from the development.

THIS DOCUMENT IS INFORMATIONAL ONLY, AND DOES NOT CONSTITUTE ANY TYPE OF APPROVAL FROM THE DELAWARE STATE FIRE MARSHAL'S OFFICE

Following receipt of this letter and upon filing of an application with the local jurisdiction, the applicant shall provide to the local jurisdiction and the Office of State Planning Coordination a written response to comments received as a result of the pre-application process, noting whether comments were incorporated into the project design or not and the reason, therefore.

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

Sincerely,



David L. Edgell, AICP
Director, Office of State Planning Coordination

Attachment:

- Dover/Kent County MPO Comments

ADVISORY BRIEF

TO: Delaware Office of State Planning Coordination

FROM: Malcolm Jacob

DATE: 3/10/2026

SUBJECT: PLUS Comments 2/2026

Dear Members of the OSPC,

Attached, please find comments submitted by Dover Kent MPO for each of the current Preliminary Land Use Service (PLUS) project reviews in Kent County. These comments are a part of the MPO's ongoing goals of promoting transportation safety and connectivity within the region. They are submitted in accordance with the support given by the MPO Council on November 6, 2024.

Projects were reviewed during the PLUS meeting of **Wednesday, March 4, 2026**, and comments are being submitted as a follow-up to this meeting. Please reach out to the MPO if further input is needed.

Sincerely,

Malcolm Jacob
Transportation Planner
Dover/Kent County Metropolitan Planning Organization
Malcolm.Jacob@doverkentmpo.org
(302) 387-6030
https://doverkentmpo.delaware.gov/

4. Knight Crossing (2026-02-05)

While Dover Kent County MPO does not normally comment on applications located outside of Kent County, it is worth mentioning that Cedar Beach Road is the subject of the recently completed *Milford-Slaughter Beach Shared Use Path Feasibility Study* (2025).[1] Within this study, Segment 1 provides concepts for separated bicycle facilities between S Rehoboth Boulevard and SR1 on Cedar Beach Road. The alternatives for Segment 1, as well as a matrix showing the feasibility of each alternative, are shown on pages 40-41 of the document. The study's recommendations include extending the pathways from the Knight Crossing development to connect with Cedar Beach Road and potentially as far as S Rehoboth Boulevard; doing so would create new transportation connections and improve the safety and accessibility for cyclists and pedestrians.

At the time of the study's completion, it was Dover Kent MPO's understanding that a 10' wide shared use path would be added to the frontage of the property on Beaver Dam Road, providing much-needed safety improvements for residents of Knight Crossing and setting up potential connections with other locations. However, this does not appear to be shown in the current PLUS application. Based on the findings of the study, Dover Kent MPO strongly recommends that a 10' shared use path be required for this location in order for development to proceed. The same should be done along the entire frontage of Cedar Beach Road, as the property fronts both of these roads.

Finally, a pedestrian crossing should be added to the entrance on Cedar Beach Road. Residents of Knight Crossing will be frequently walking to the mixed-use buildings on the other side of the road, which means a safe crossing is needed at this location. This should include a marked crosswalk, ADA-compliant curb ramps, and pedestrian signals or Rectangular Rapid Flashing Beacons (RRFBs).

[1] *Milford-Slaughter Beach Shared Use Path Feasibility Study*. Dover/Kent County MPO (2025). https://doverkentmpo.delaware.gov/files/2025/12/Milford-Slaughter-Beach-Shared-Use-Path-Feasibility-Study_w-Appendices_FINAL.pdf.