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

March 26, 2026

Siteworks Engineering, LLC
Attn: Dave Heatwole
PO Box 2
39 Commerce Street,
Harrington, DE 19952

RE: PLUS Review – 2026-02-08; EZ Work Trucks - Repair Facility

Dear Mr. Heatwole:

Thank you for meeting with State agency planners on March 4, 2026, to discuss EZ Work Trucks – Repair Facility. According to the information received, you are seeking review of a proposed site plan for a 98,000 sq ft commercial vehicle repair facility.

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 Harrington 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 an Out-of-Play area. The proposed site plan shows the proposed improvements are outside of the Out-of-Play area and are concentrated in Level 1. This site is located within the City of Harrington 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. Out-of-Play areas are permanently protected and/or heavily regulated.

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 truck repair facility.

Code Requirements/Agency Permitting Requirements

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

- U.S. Rt. 13 S. Dupont Highway is a state-owned and state-maintained road. As such, any access point onto U.S. Rt. 13 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.

- The location proposes access on to DuPont Boulevard (US Rt. 13). US Rt. 13, at this location, is within an area regulated by the Corridor Capacity Preservation Program (CCPP). See Section 1.2 of DelDOT's Development Coordination Manual and Section 145, Title 17 of the Delaware Code for additional, specific information on the CCPP. The goal of the Program is to maintain the capacity of the existing highway by managing access along it. Please contact our office for specific information concerning access controlled by the CCPP.

- In terms of traffic analysis and based on the expected trip generation this project will qualify for the area wide study fee. Please continue to work with our office to determine any additional specifics necessary for that analysis.

- 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 any state maintained 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 Manual, DelDOT will require the establishment of a 15-foot wide permanent easement across the property frontage on US. Rt. 13. 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 established for the State of Delaware, as per this plat."**

- 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.

- 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. DelDOT anticipates requiring an SUP along the site frontage on US Rt. 13.

- In accordance with Section 3.8 of the Development Coordination Manual, storm water facilities, excluding filter strips and bioswales, shall be located a minimum of 20 feet from the ultimate State right-of-way along all frontage roads.

- 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.

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.

Special Flood Hazard Area

According to the newest Flood Insurance Rate Maps (FIRM), a portion of the proposed maintenance building and a parking lot are proposed within the Special Flood Hazard Area, specifically within the mapped 100-year floodplain (1% annual chance of flooding). The Special Flood Hazard Area identified on the site lies within zone AE.

- 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/

Underground Storage Tank

Based on DNREC records, two Underground Storage Tanks have been identified on western side of the site, DTS Callis Thompson (1-000568) and Coastal Pump and Tank Inc (1-000156). Due to historical Leaking Underground Storage Tank (LUST) activity, conditions apply to disturbance of

soil at this location. Approval of a Contaminated Materials Management Plan (CMMP) may be required prior to construction activities.

- 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/

Brownfields

The proposed project lies within an open brownfield site, called RS Sites: 17399, 17403, 17439 S. DuPont Highway (DE-1791). In Delaware, a brownfield is defined as "real property, the expansion, redevelopment, or reuse of which may be hindered by the reasonably held belief that the real property may be environmentally contaminated." The productive use of these idle properties provides "new" areas for economic development, primarily in former industrial/urban areas with existing utilities, roads and other infrastructure.

- Financial assistance is available to eligible parties, that have not already taken ownership of the subject property, in the form of Brownfields Grants and the Brownfields Revolving Loan Fund, for the cleanup and redevelopment of vacant, abandoned or underutilized properties which may be contaminated. DNREC's Brownfield program can provide grant funding and potential liability protections when investigating and remediating Brownfield sites. If the applicant is seeking liability protections, it is important to contact the Program prior to taking ownership of the property.

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

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 stormwater facility appears to be proposed within Special Flood Hazard Area. Discuss citing with the appropriate delegated agency for stormwater management. For this project, the plan review agency is the Kent Conservation District.

- 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.

- 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: Kent Conservation District (302) 608-5370 Website: https://www.kentcd.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/

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/

Tax Ditches

The proposed project is within the Jackson Tax Ditch watershed. Tax ditches are man-made channels created to move normal water flow off agricultural lands. These channels have associated tax ditch Rights-of-Way (ROW) that are utilized for access as well as sediment and debris disposal during maintenance. Tax ditch ROWs vary by channel size and location. The following ROWs exist on this site, listed by parcel:

- 6-09-18005-01-4800-00001 – Prong 4 of Jacksons Tax Ditch has an 80-foot to Center Line ROW

- 6-09-18005-01-4900-00001 – Main of Jacksons Tax Ditch has an 80-foot to Center Line ROW

- 6-09-18005-01-5000-00001 -Main of Jacksons Tax Ditch has an 80-foot to Center Line ROW

The following is required:

- Clearly delineate and label existing and proposed Tax Ditch [Prongs] and associated ROW on all sheets where it appears, including on adjacent properties.

- Contact the DNREC Drainage Program to discuss the on-site tax ditch ROWs prior to the project application meeting with the appropriate plan review agency for construction stormwater management.

- The integrity of the tax ditch channel, bank, and ROW access cannot be compromised by any proposed activities, and the ROW must remain traversable for large maintenance equipment and/or disposal of soil or debris.

- Stormwater Management Facilities and associated infrastructure are the responsibility of the private landowner or HOA even if located within the tax ditch channel.

- Any proposed riprap shall be installed so that the top of the riprap is at or below existing grade of the channel to not obstruct flow.

- Permanent obstructions, including but not limited to; stormwater management facilities, buildings, sheds, streets, wells, landscape plantings, driveways and septic systems are not allowed within the tax ditch ROW.

- Existing tax ditch ROWs on a property should be cleared a minimum of 25 feet from top of bank as part of project construction if this minimum travel pathway does not currently exist.

- 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/
Tax Ditch Mapper: de.gov/taxditchmap
Tax Ditch guidelines:
https://documents.dnrec.delaware.gov/swc/Drainage/Documents/Tax-Ditch-Land-Development-Guidelines.pdf

Federal Consistency Certification

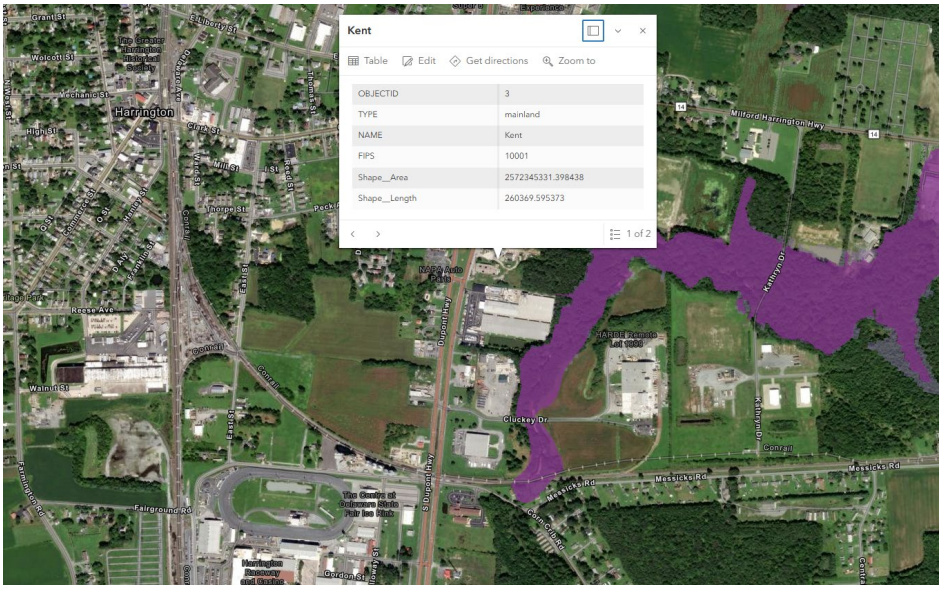
Please note that federal consistency review by the Delaware Coastal Management Program (DCMP) may be required for other federal agency license/permit applications. See Section 3.2 of the DCMP Policies and Procedures document for the list of federal license and permit activities requiring federal consistency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

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

Proposed Project Parcel Flood Concern

- This parcel is primarily located within an area of **Minimal Flood Concern of 1,000 years or greater**; however, a 100-year or 1% annual chance flood does exist at the eastern-most side of the property. It does not appear that any construction is occurring within this floodplain, though the proposed development appears to be located close to its boundary.



Parcel Status within County Evacuation Zone Location

- The parcel is not yet located within a Kent County Evacuation Zone.

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

- The Delaware SHPO does not recommend development in Out of Play areas. There are known archaeological sites nearby. There is moderate to high potential for archaeological resources. Based on the amount of tree removal planned, our office recommends an archaeological survey prior to any ground disturbance activities.

  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)

- 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.

- Horizontal standpipes are required by the DSFPR Regulation 702 for structures that exceed 60,000 sq. feet.

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 South duPont Highway 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)

- 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 and 2 according to Delaware Strategies for State Policies and Spending (SSPS). DelDOT goals in such areas include prioritizing 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.
- The functional classification of US. Rt. 13 is principal arterial. Principal arterials serve major centers and provide a high degree of mobility. This project is generally in alignment with that function being in the City of Harrington and in a SSPS investment Levels 1 and 2.
- DelDOT encourages the applicant to work with the Dover/Kent MPO to understand studies conducted in this area with recommendations that may be applicable to the site, such as the East-West Truck Study and the Harrington Multimodal Freight Terminal Feasibility Study.

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

Environmental Permits and Regulations
Through PLUS, DNREC reviewers typically provide information related to site design. In this context, reviewers provide information on permitting requirements when it relates to site design and pre-construction activities. However, such information is not the entirety of all permits that may apply to this proposal.

- It is recommended that the applicant schedules a meeting with the DNREC Regulatory Advisory Service to learn about the environmental permits and regulations that apply.

Contact: DNREC Regulatory Advisory Service at (302) 739-9069

Website: https://dnrec.delaware.gov/community-services/regulatory-advisory-service/

Special Flood Hazard Area
According to the newest Flood Insurance Rate Maps (FIRM), a stormwater management pond, a portion of the proposed maintenance building, and parking is proposed within or close to the within the Special Flood Hazard Area. The Special Flood Hazard Area identified on the site lies within zone AE.

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

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

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.

- 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/

Forested Wetlands

Maps from the Statewide Wetlands Mapping Project indicate the potential presence of forested wetlands on the eastern 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.

- 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.

- 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/

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.

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/

Sustainable Practices

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

- Install solar in commercial buildings and offer the option for solar in residential dwellings. 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 310.20 persons per square mile based on the US 2020 Census report; an increase from 2010 at 271.30 persons per square mile. The specific census block(s) the project is located on has a total population of 56 persons, though, with development, this will undoubtedly change. The 14 adjacent blocks aggregated bring the area to a total population of 165 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 low** 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 is rated as **relatively moderate** whereas its social vulnerability is rated as **relatively high.**

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.

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 commercial developments in their district have put 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 tenants need to help financially support the Volunteer Fire Department.

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.

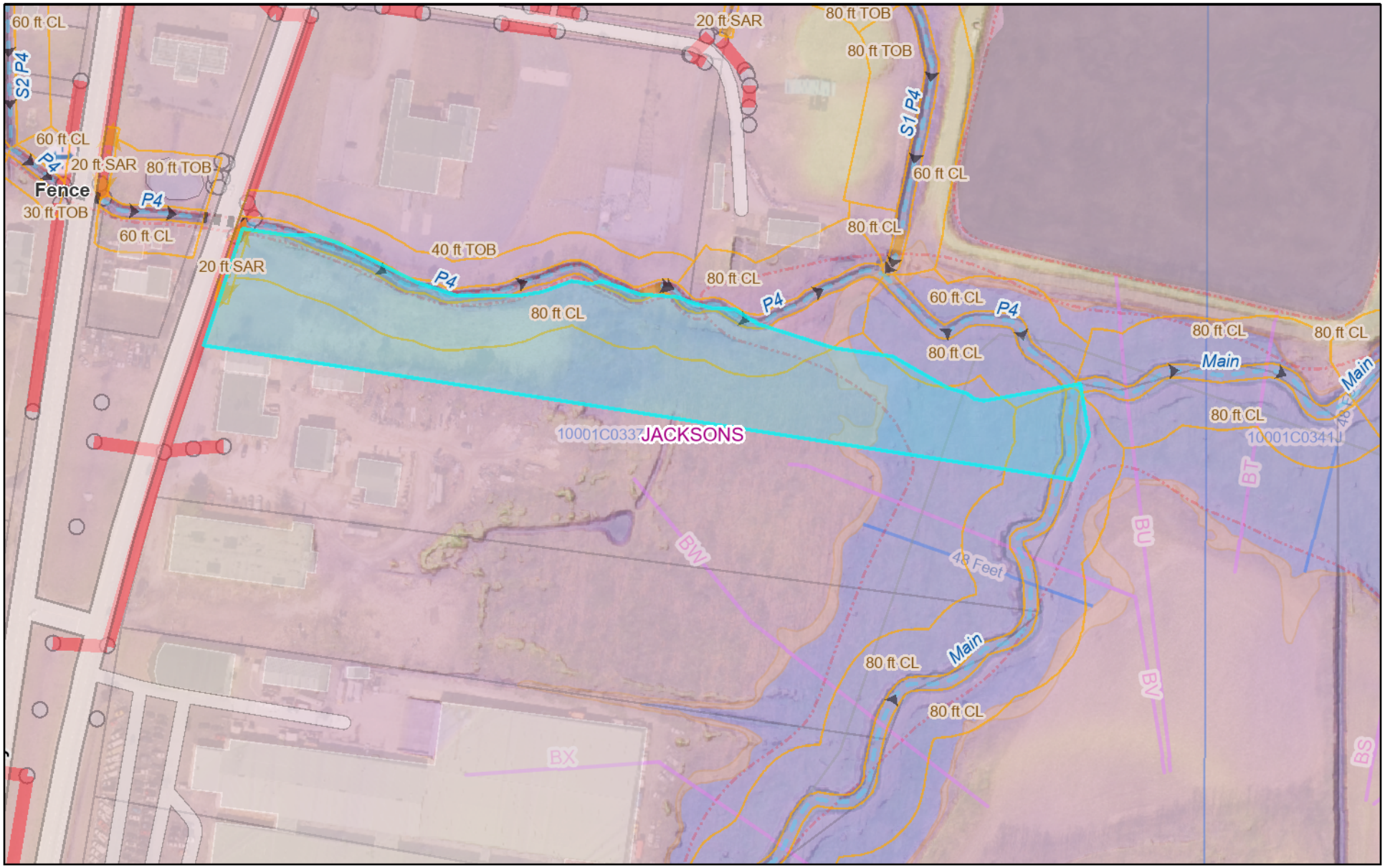
Sincerely,

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

Attachments:

- DNREC Delaware Drainage Maps
- Dover/Kent County MPO Comments

Delaware Drainage Program Map



2/17/2026, 9:34:39 AM

Tax Ditch Channels - System
Tax Ditch Channel
Special Access ROW
Pipe - DelDOT
Pipe - Tax Ditch
Extent of Right-of-Way
Approx. Watershed Boundary

GATES
Fence

NPDES - Pipes/Culverts
Other Conveyances
Structure Drainage Areas

BMP Drainage Areas

Structures
Non-DelDOT Structures
Inlet
Inlet, Outfall
Manhole
Manhole, Outfall

Pipe End
Pipe End, Outfall
Junction Box
Pipe Connection
Control Structure
Culvert Point
Culvert Point, Outfall

Swale Point
Swale Point, Outfall
Dummy Point
Dummy Point, Outfall
Temporary Dummy Point

Conveyances
Swale

Hydraulic Connection
Driveway Culvert
Guardrail Culvert
Roadway Culvert
Pipe

BMPs
Non-DelDOT BMPs

DelDOT
Parcels - Kent
DE_Boundaries - State and County Boundaries
DE_Wetlands - 2017 Wetlands (not regulatory)
Base Flood Elevation
Cross Sections
FIRM Panel

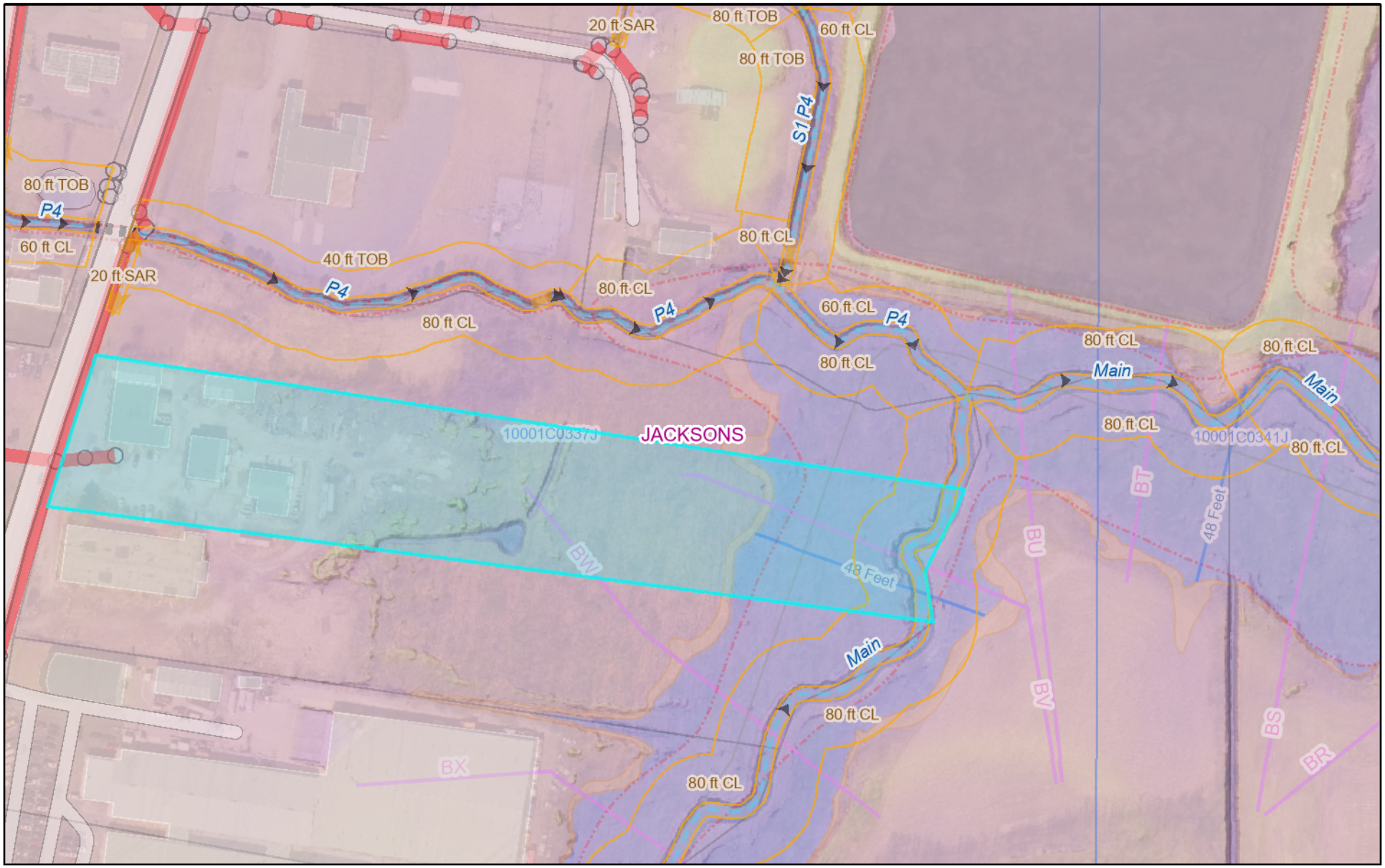
1:3,113

0 112.5 225 450 ft

0 30 60 120 m

SAM, U.S. Geological Survey, FEMA, Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community,

Delaware Drainage Program Map



2/17/2026, 9:42:26 AM

Tax Ditch Channels - System
- Tax Ditch Channel
- Special Access ROW
- Pipe - DelDOT
- Pipe - Tax Ditch
- Extent of Right-of-Way
- Approx. Watershed Boundary

NPDES - Pipes/Culverts
- Other Conveyances
- Structure Drainage Areas
- BMP Drainage Areas

Structures
- Non-DelDOT Structures
- Inlet
- Inlet, Outfall
- Manhole
- Manhole, Outfall
- Pipe End
- Pipe End, Outfall
- Junction Box
- Pipe Connection
- Control Structure
- Culvert Point
- Culvert Point, Outfall
- Swale Point
- Swale Point, Outfall
- Dummy Point
- Dummy Point, Outfall
- Temporary Dummy Point

Conveyances
- Swale
- Hydraulic Connection
- Driveway Culvert
- Guardrail Culvert
- Roadway Culvert
- Pipe

BMPs
- Non-DelDOT BMPs
- DelDOT
- Parcels - Kent
- DE_Boundaries - State and County Boundaries
- DE_Wetlands - 2017 Wetlands (not regulatory)

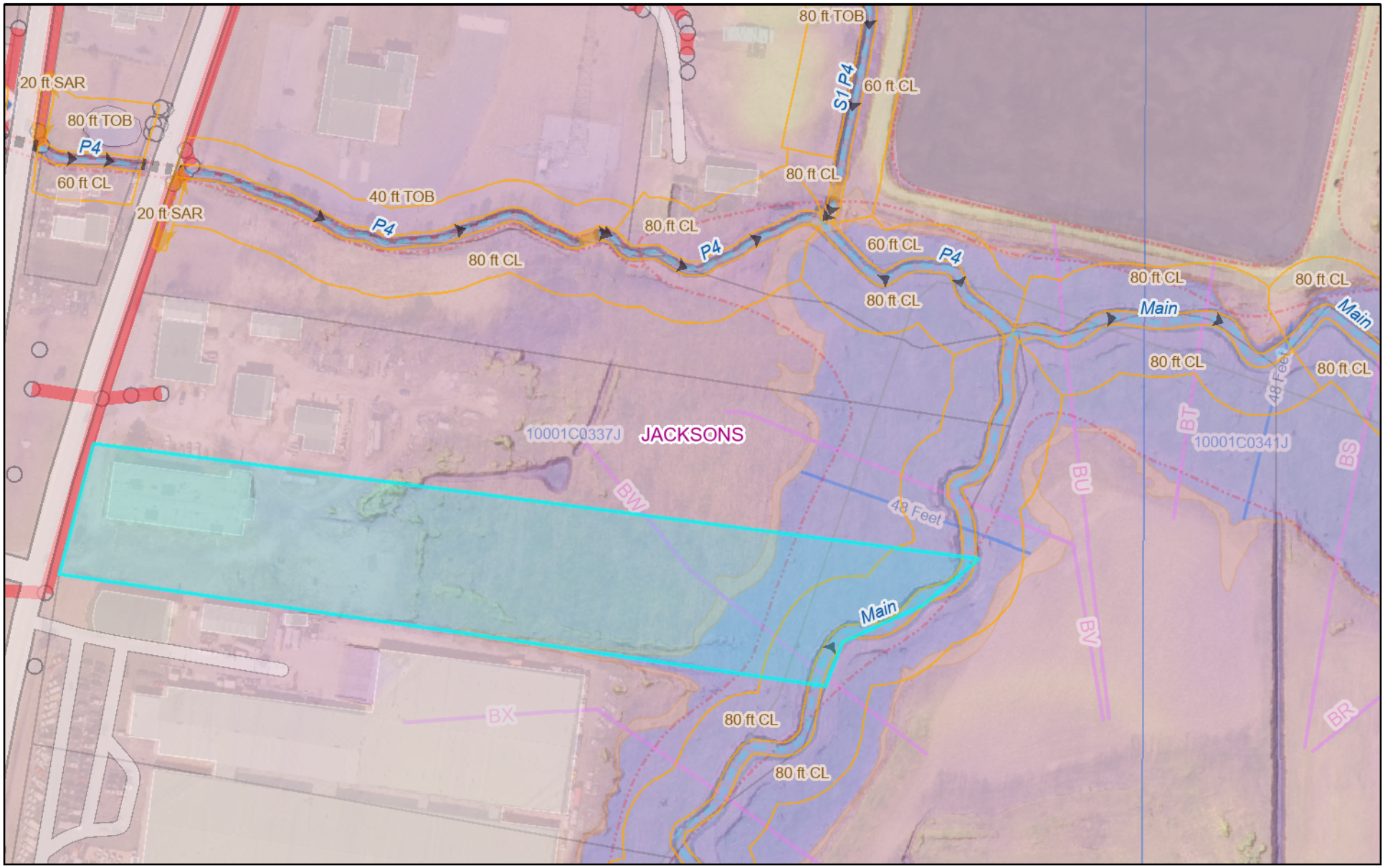
1:3,113

0 112.5 225 450 ft

0 30 60 120 m

SAM, U.S. Geological Survey, FEMA, Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community,

Delaware Drainage Program Map



2/17/2026, 9:45:30 AM

1:3,113

0 112.5 225 450 ft

0 30 60 120 m

Tax Ditch Channels - System
Tax Ditch Channel
Special Access ROW
Pipe - DelDOT
Pipe - Tax Ditch
Extent of Right-of-Way
Approx. Watershed Boundary

GATES
Fence

NPDES - Pipes/Culverts
Other Conveyances
Structure Drainage Areas

BMP Drainage Areas

Structures
Non-DelDOT Structures
Inlet
Inlet, Outfall
Manhole
Manhole, Outfall

Pipe End
Pipe End, Outfall
Junction Box
Pipe Connection
Control Structure
Culvert Point
Culvert Point, Outfall

Swale Point
Swale Point, Outfall
Dummy Point
Dummy Point, Outfall
Temporary Dummy Point

Conveyances
Swale

Hydraulic Connection
Driveway Culvert
Guardrail Culvert
Roadway Culvert
Pipe

BMPs
Non-DelDOT BMPs

DelDOT
Parcels - Kent
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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/

2. EZ Work Trucks - Repair Facility (2026-02-08)

While the addition of this facility will provide economic benefits to the Harrington area, there are safety issues that should be addressed first. Dover Kent MPO's recently completed *East/West Freight Routes Phase 2 Study* examines the issues facing the trucking industry in Harrington and elsewhere in Kent County. During stakeholder engagement, several industries brought attention to their inability to cross the US13 northbound lanes in order to take their trucks south on US13. It was found that the existing turning lane is "not geometrically adequate to accommodate the largest trucks" and the geometry "necessities large turning trucks to encroach on the oncoming lane."[1] This is a serious risk towards safety that should be addressed before additional trucks are brought to the area.

The recommended improvements to this location include converting the existing crossover into a single-lane, dedicated crossover for US13 northbound vehicles to access US13 southbound. The improved crossover, with adequate width and turning radius for trucks, would also include a northbound turn lane. While these improvements would contribute significantly to transportation safety in Harrington, the dedicated crossover would not be accessible to trucks leaving the Dover Land Holdings, LLC property, if it were to replace the existing crossover and utilize the same location. However, the study also proposes adding a new two-way crossover, like the one that currently exists but further to the north, for use by personal vehicles. The applicant should work with DelDOT to determine whether these improvements can be implemented, and whether they need to be shifted or adjusted to accommodate outbound traffic from the Dover Land Holdings, LLC property. Appendix C of the study shows the concept improvements recommended for Harrington, including the dedicated crossover.[2]

Note that upgrades to the crossover were first recommended in the *Harrington Multimodal Freight Terminal Feasibility Study* as part of improvements to truck accessibility to and from the industrial park on Cluckey Drive. This study, like its successors, also recommended converting the crossover into single-lane crossover that accommodates large vehicles.[3] The improvements were subsequently included in Dover Kent MPO's Metropolitan Transportation Plan (MTP), *Innovations 2050*, as a recommended short-term (between 0 and 5 years) transportation project due to the anticipated safety and economic benefits.[4]

The site plan includes several vehicle staging areas throughout the property. This is something Dover Kent MPO supports, as it provides designated areas for trucks to wait, which reduces the likelihood of "undesignated" parking in the parking lots and on roadsides throughout Harrington. The garage doors on both sides of the building will also help with truck circulation and ensure trucks don't have to back

[1] *East/West Freight Routes Phase 2 Study*. "Concepts." Dover/Kent County MPO (2025). https://doverkentmpo.delaware.gov/files/2025/07/East-West-Final-Report-with-Appendicies.pdf#page=29.
[2] *East/West Freight Routes Phase 2 Study*. "Appendix C." Dover/Kent County MPO (2025). https://doverkentmpo.delaware.gov/files/2025/07/East-West-Final-Report-with-Appendicies.pdf#page=434.
[3] *Harrington Multimodal Freight Terminal Feasibility Study*. Dover/Kent County MPO (2021). https://doverkentmpo.delaware.gov/files/2021/09/Harrington-Multimodal-Freight-Terminal-Feasibility-Study-FINAL_2021-08-05.pdf#page=37.
[4] *Innovations 2050*. Dover/Kent County MPO (2025). https://doverkentmpo.delaware.gov/files/2025/01/Innovations-2050-FINAL-1-8-2025-compressed-with-cover.pdf#page=137.

up to exit the warehouse. In addition to these measures, Dover Kent MPO recommends adding several designated truck parking spaces, for the purpose of keeping trucks on-site as the need arises. It was found in the *Delaware State Freight Plan*[5] and Dover Kent MPO's *Truck Parking Amenities Study*[6] that there is a severe shortage of truck parking in the State of Delaware. The addition of truck parking spaces in this site plan would help address this problem, specifically for the vehicles regularly accessing the property.

The site plan proposes to establish new pavement along the southerly perimeter to abut existing pavement on the adjoining property. If this paved space is intended for shared vehicular space between the two (2) properties, it is recommended that a cross-access easement be negotiated between the two property owners that sets forth allowances and responsibilities of each owner. Such easement document shall be executed and recorded to become binding upon present owners, their heirs, and/or assigns.

The site plan shows pedestrian improvements such as sidewalks along the property's frontage and crosswalks connecting key locations. There are also accessible parking spaces close to the building entrances. These are all measures that Dover Kent MPO supports. The applicant will need to include curb ramps and other accessibility features as required by DelDOT and the City of Harrington.

Finally, more than 50% of this site is currently in mature woodland and is shown to be cleared. It is recommended that the City of Harrington require a modicum of site landscaping in the form of native shade tree plantings along the US13 frontage to the property. Shade tree plantings along the frontage of the site would provide limited natural cover and pools of shade along the new pedestrian frontage environment. Selection and specifications should be provided by a certified Arborist/Nursery Professional or Delaware Registered Landscape Architect.

[5] *Delaware State Freight Plan*. Delaware Department of Transportation (DelDOT) (2022). https://deldot.gov/Business/freight/pdfs/2024/Delaware%20State%20Freight%20Plan%20-%20Full.pdf?cache=1728400227518.

[6] *Truck Parking Amenities Study*. Dover/Kent County MPO (2023). https://doverkentmpo.delaware.gov/files/2023/03/Truck-Parking-Amenities-Final-3.2023.pdf.