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

October 21, 2026

Ensar Arslan
246 Osbourne Ln.
Dover, DE 19904

RE: PLUS review – 2026-09-05; Arslan Commercial Development

Dear Mr. Arslan:

Thank you for meeting with State agency planners on September 30, 2026, to discuss Arslan Commercial Development. According to the information received, you are seeking review of a proposed amendment to the Kent County Comprehensive Plan to change the future land-use designation on two of the parcels from Medium-Density Residential to Highway Commercial, which would enable the review of a potential rezoning from RS1 (Single-Family Residential) to BG (General Business) and site plan review for the development of retail shopping center with parking.

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 Kent County is the governing authority over this land, the developers will need to comply with any and all regulations/restrictions set forth by the County.**

Strategies for State Policies and Spending

The parcels for the proposed amendment are located in Investment Level 1 according to the 2025 Strategies for State Policies and Spending and are inside the Growth Overlay Zone for Kent County.

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. Because development in Level 1 is consistent with the 2025 Strategies for State Policies and Spending, the Office of State Planning Coordination supports this comprehensive plan amendment and the proposed site plan.

Code Requirements/Agency Permitting Requirements

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

- South State Street is a state-owned and state-maintained road. As such, any access point 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

- 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. By this regulation, this dedication is to provide a minimum of 40 feet of right-of-way from the physical centerline of all State maintained roads. The following right-of-way dedication note is required, "An 40-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 with State maintained roadways. 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."

- In accordance with Section 3.8 of the 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 State maintained 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. DelDOT anticipates requiring a sidewalk along the frontage of South State Street.

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

- Upgrade the existing stop to shelter pad according to the M-9 specs along the frontage of the site.

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.

Asbestos

The application proposes the demolition of two and renovation of one existing building(s) on-site. Existing building materials may contain asbestos. Asbestos-containing materials were widely used in industrial and commercial facilities, as well as in homes, until the 1980s. When asbestos is disturbed, it can break down into microscopic fibers that may become airborne. Once airborne, these fibers can be inhaled and trapped in the lungs, posing a health threat. The greatest potential for exposure to asbestos fibers occurs when asbestos-containing building materials are disturbed during building renovations or demolitions.

- The applicant must comply with all applicable state requirements of 7 Del. C., §1121 Emission Standards for Hazardous Air Pollutants, 10.0 Emissions Standards for Asbestos.

- Prior to any demolition or renovation of existing buildings, thorough inspection for asbestos is required. Inspection must be performed by a licensed asbestos inspector. A list of licensed asbestos service professionals or abatement firms can be found at https://data.delaware.gov/Licenses-and-Certifications/Certified-Asbestos-Vendors/f677-ahd9/data.

- Per federal requirements, any building being demolished or renovated requires a certificate to confirm the absence of asbestos before demolition or renovation may occur. There are no exceptions, including the age of the facility.

- If the presence of asbestos-containing material is confirmed and said material is deteriorating or will be disturbed during renovation or demolition, it must be removed by a licensed asbestos contractor. More information on building renovation and demolition can be found at https://dnrec.delaware.gov/air/asbestos/renovation-demolition/.

- The applicant must comply with all applicable federal notification requirements related to the stripping and/or removal of asbestos-containing material. See contact information below for the US Environmental Protection Agency.

Contact: DNREC Asbestos Management Program at (302) 323-4542.
Website: https://dnrec.delaware.gov/air/asbestos/

Contact: US Environmental Protection Agency Asbestos Ombudsman at 1-800-368-5888.
Website: https://www.epa.gov/asbestos/information-owners-and-managers-buildings-contain-asbestos#renovations

Wellhead Protection Area
A Wellhead Protection Area is located on the northern two-thirds of the site. Wellhead Protection Areas are the surface and subsurface areas surrounding a water well, or a public water supply wellfield. Contaminants leaching into the soil have the potential to reach the water supplies in these areas.

- The applicant must comply with all county and municipal codes that affect public drinking water supply Wellhead Protection Areas.

Contact: DNREC Source Water Assessment and Protection Program at (302) 739-9948.
Website: https://dnrec.delaware.gov/water/commercial-government/water-allocation/assessment-and-protection/

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: DNREC Commercial and Government Services Section at (302) 739-9948.
Website: https://dnrec.delaware.gov/water/commercial-government/

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 Kent 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: Kent Conservation District at (302) 608-5370.
Website: http://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/

Air Quality – Particulate Emissions
Particulate emissions are regulated by DNREC's Division of Air Quality. To control particulate emissions from construction and materials handling operations, the following is required:

- The applicant must use dust suppressants and other measures during demolition activities, grading, land clearing, excavation of non-paved roads, material movement or storage, and sandblasting activities.

Contact: DNREC Division of Air Quality at (302) 739-9402.
Website: https://dnrec.delaware.gov/air/permitting/

Delaware Department of Agriculture – Contact: Milton Melendez 302-698-4534

- No restrictive comments regarding this PLUS project.

Delaware Emergency Management Agency – Contact Tara Wilbur 302-659-2325

Proposed Project Parcel Flood Concern
- This parcel is located within an area of **Minimal Flood Concern of 1,000 years or greater**.

Parcel Status within County Evacuation Zone Location
- The parcel is located within Kent County 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.

<u>State Historic Preservation Office – Contact Carlton Hall 302-736-7400</u>

- There is a known documented structure on parcel 7-00-0951-01-3300-00001 constructed in the 1930s. There is also an undocumented circa 1950s vernacular Bungalow structure on parcel 7-00-0951-01-3400-00001. Both structures exceed minimum age requirement to be eligible for the National Register. Therefore, The Delaware SHPO is recommending an architectural survey of the exterior of both buildings if the plan for them is demolition.
- If there is federal involvement, in the form of licenses, permits, or funds, the federal agency, often through its client, is responsible for complying with Section 106 of the National Historic Preservation Act (36 CFR 800) and must consider their project's effects on any known or potential cultural or historic resources.

For further information or additional details pertaining to the Section 106 process and the Advisory Council's role; please review the Advisory Council's website at the following:

https://www.achp.gov/protecting-historic-properties/section-106-process/introduction-section-106 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

- This Agency has no objection to the re-zoning request.

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 1500 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

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 State Street 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 project will have access to South State Street which has the functional classification of minor arterial. Minor arterial roadways serve to provide intra-community continuity and connect larger arterial roadways. This project will generally be in alignment with that functional classification.

- This project is located primarily in Investment Level 1 according to the 2025 State Strategies for Policy and Spending. In Investment Level 1 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. This project is aligned with these policy priorities.

- The applicant should be aware of ongoing and future studies being conducted by the Dover/Kent Metropolitan Planning Organization (MPO) along this corridor. As noted in their Metropolitan Transportation Plan, Innovations 2050, The Dover Kent MPO is working on Phase 1 of the "South State Street Corridor" study from US 13 to DE 10. Although the boundary for this particular phase ends before the applicant's property, the entire study will eventually cover the corridor from US 13 to SR 1. The applicant is encouraged to coordinate with DelDOT on the study recommendations should timelines match.

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

Stormwater Management

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

Plan review agency contact: Kent Conservation District at (302) 608-5370.
Website: http://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/

Water Quality

This site lies within the Saint Jones River Watershed. Surface water quality in this watershed does not meet Federal and/or State Water Quality Standards and a Pollution Control Strategy is in place for this watershed.

- Implement vegetated buffers with a width of at least 100 feet around all water features on or adjacent to the site.
- Reduce impervious surfaces on the project site by eliminating areas of impervious pavement and/or using pervious pavement where practicable.
- Reduce stormwater runoff by integrating infiltration basins, bioretention (rain gardens), filter strips, and by preserving existing trees, wetlands, and passive open space.
- Reduce the necessity for nutrient application by maintaining open space as meadow or forest planted exclusively with native plants. Native plants are well-suited to our climate and require limited maintenance.

Contact: DNREC Division of Watershed Stewardship's Watershed Assessment Section at (302) 739-9939. https://dnrec.alpha.delaware.gov/watershed-stewardship/

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.

- Any drainage/utility easement should not possess structures such as decks, buildings, sheds, kennels, or fences within the drainage easement to allow for future drainage maintenance. Trees and shrubs planted within a drainage/utility easement should be spaced to allow for drainage maintenance at maturity.

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

Air Quality – Design to Minimize Mobile Source Emissions
Mobile sources include a variety of motor vehicles and mobile equipment that generate air emissions, such as ozone, particle pollution, and air toxics. The DNREC Mobile Sources Control Program reduces motor vehicle-related pollution from both on-road vehicles and non-road vehicles.

- Consider designing the project to connect to local pedestrian and bicycle networks, as well as public transit. The closest bus stop appears to be less than 1 mile from this site. Designing for travel alternatives has the potential to minimize the overall tailpipe emissions associated with the use of this site.

- Consider designing the project for low maintenance green spaces. Designing green spaces to be less dependent on gas-powered lawn and garden equipment has the potential to minimize emissions associated with the on-going maintenance of this site.

Contact: DNREC Division of Air Quality's Mobile Sources Program at (302) 739-9402.
Website: https://dnrec.delaware.gov/air/mobile-sources/

Sustainable Practices

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

- Consider installing electric vehicle charging stations for customers and employees. Installation costs can vary significantly depending on the parking and electricity distribution at a given location, so it is often easier and cheaper to plan for the installation at construction, rather than doing costly retrofits later. The DNREC Division of Climate, Coastal and Energy offers rebates of up to 75% of the cost of purchasing and installing the charging station for commercial properties. These programs address climate change goals of reducing greenhouse gas emissions and improving overall air quality (https://dnrec.delaware.gov/climate-coastal-energy/clean-transportation/).

- Consider using renewable energy infrastructure such as solar or geothermal 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/).
- 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.
- 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.
- 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.
- Include space for recycling dumpsters within the preliminary site design stage. These can be placed adjacent to trash dumpsters.

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

Delaware Emergency Management Agency – Contact Tara Wilbur 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 258 persons, though, with development, this will undoubtedly change. The 14 adjacent blocks aggregated bring the area to a total population of 1210 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 moderate** 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.

- 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 Cole Shultz (302) 739-4263

- DSHA has no comments or concerns on this proposed rezoning.

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.

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:

- Dover Kent MPO Comments

2. Arslan Commercial Development (2026-09-05)

First, note that South State Street was identified in Dover Kent MPO's Metropolitan Transportation Plan (MTP), *Innovations 2050*, as a road that will experience severe capacity issues in the coming decades. This is largely due to the increasing residential and commercial development actively taking place along the corridor. According to the volume-to-capacity data collected for the MTP, this segment of State Street is projected to experience failing conditions during peak PM hours by 2030, and it will reach the worst category of volume-to-capacity ratios by 2040.[1] While specific treatments on State Street to alleviate the future capacity issues have not yet been identified, one of the recommendations from the MTP was a three-phase study of State Street to identify current and future challenges and propose short-term and long-term solutions.

Dover Kent MPO is currently studying the segment of State Street between US13 (S Dupont Highway) and SR10 (Lebanon Road).[2] This is the first of three phases of studies, and it will involve data collection, public engagement, identification of key issues, and recommended improvements to address these issues. The second phase, which is expected to take place in 2027-2028, will include the segment of State Street between SR10 and Walnut Street in Magnolia. The second phase of the study will cover the area around the subject property. The MPO will be seeking feedback on this segment's conditions from residents and business owners once the second phase begins, though the applicants are also welcome to provide their thoughts on State Street during this first phase.

Second, the applicants should plan to add sidewalk facilities to the frontage of each of the subject properties. These sidewalks should be included in the site plan. State Street is a highly traveled minor arterial roadway with an Annual Average Daily Traffic (AADT) of 12,177.[3] There are many residential neighborhoods along the corridor that people could walk from, including several that are adjacent to the subject properties. However, the current lack of sidewalks, combined with the posted speed limit of 40 mph, makes the conditions dangerous for pedestrians and presents a barrier to residents trying to access nearby businesses and places of work.

Adding sidewalks to these properties will not only create new nonmotorized connections, but doing so will also encourage new frontage sidewalks on the neighboring properties. This is especially important for when the neighboring properties are developed, as there will already be existing facilities for them to connect to. A potential long-term impact of a more walkable environment is an overall reduction in vehicle traffic, which would consequently cut down on vehicle congestion and improve air quality. Note that new sidewalk facilities should follow the DelDOT standard, as outlined in the DelDOT *Pedestrian Accessibility Standards Manual*.[4]

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[1] *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=35.

[2] "South State Street Corridor Study" (PublicInput). Dover/Kent County MPO. https://publicinput.com/sstatest26.

[3] "Traffic Counts." DelDOT Gateway. Delaware Department of Transportation (DelDOT). https://experience.arcgis.com/experience/e8679c5c19e14bafbff864eeaf553251.

[4] *Pedestrian Accessibility Standards Manual*. Delaware Department of Transportation (DelDOT) (2021). https://deldot.gov/Publications/manuals/pedestrianAccessibility/pdfs/2021/Pedestrian-Accessibility-Standards-for-Facilities-in-the-Public-Right-of-Way-2021-Edition.pdf.

Another recommended improvement is a marked crosswalk close to the existing DART bus stop at the corner of Becky Lane. This would allow residents on the western side of State Street to safely access the subject properties, the bus stop, and other destinations on the eastern side of the road. The addition of Rectangular Rapid Flashing Beacons (RRFBs) would make the crosswalk safer. The applicants should speak with DelDOT about how this could be accomplished; Dover Kent MPO is willing to be a part of this conversation.

As discussed during the PLUS meeting, it is important that the applicants work with Delaware Transit Corporation (DTC) to upgrade the existing DART bus stop at this location. Currently the bus stop does not meet ADA requirements and consists only of a sign along the side of the road. DTC will be able to provide guidance on the steps needed to improve this bus stop and make it more accessible.

Although it is not depicted in the draft concept plan, the applicants should remember to add accessible parking spaces to the site plan in order to meet Kent County and ADA requirements. These parking spaces should be close to the building entrance, and they should come with additional ADA facilities such as curb ramps.

The site plan should include bicycle parking so that employees and visitors will have the option to bike to the properties. This is another measure that can help improve the experience for bicyclists, which can then contribute to increased bicycle traffic, a reduction in vehicle congestion, and an improvement in air quality. If more information on different types of bike racks is needed, please contact Dover Kent MPO.

Finally, MPO staff noticed that some of the information provided in the PLUS application, particularly for Section VI (Transportation / Mobility / Connectivity), does not appear to be accurate or complete. For example, the application does not note the estimated number of vehicle trips. This value should be determined so that the appropriate on-site and off-site improvements can be carried out. DelDOT will be able to provide more information on this task. Additionally, as discussed above, there are several opportunities to connect to the larger pedestrian and transit networks in the area through new sidewalks, crosswalks, and improved bus stops. Due to the potential for increased pedestrian traffic at this location after improvements are carried out, these networks should not be overlooked.