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

November 18, 2025

Independent Engineering LLC
Attn: Neil Sander
123 Farnsworth Avenue
Bordentown, NJ 08505

RE: PLUS review – 2025-10-04 Bay City Mobile Home Park Expansion

Dear Mr. Sander:

Thank you for meeting with State agency planners on October 29th, 2025 to discuss Bay City Mobile Home Park Expansion. According to the information received, you are seeking review of a proposed site plan to add an additional 98 home sites to an existing mobile home park.

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 Sussex 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 project is predominately within Level 3. This project may be consistent with the 2020 Strategies for State Policies and Spending as it is located within Investment Levels 3. Investment Level 3 reflects areas where growth is anticipated by local, county, and state plans in the longer-term future, or areas that may have environmental or other constraints to development. State investments may support future growth in these areas, but please be advised that the State has other priorities for the near future. It should be noted there is a level 4 are within the parcel and the applicant should work with State agencies to determine if the level 4 area is an indication of an environmental constraint and, if so, should work to mitigate the issue.

Based on comments from State agencies below, if this parcel contains environmental concerns or other constraints to development, the state requests that the applicant and the local jurisdiction work with state agencies to design the site with respect to those environmental features which will help create a more sustainable development.

While specific environmental concerns are outlined in the State agency regulatory comments and recommendations, one particular concern from DNREC with regard to a potential public health and safety hazard is noted below:

Potential Public Health and Safety Hazards

The preliminary plan shows all 98 mobile home lots and internal roadways occurring directly within the 100-year floodplain, either entirely or partially. Approximately 90% of these lots are proposed in a significantly low-lying area, according to LiDAR data. Within the floodplain, 95 mobile home lots and internal roadways are also vulnerable to permanent inundation from sea level rise, representing 97% of the proposed residences. Over the next 30 years, 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.

The site design poses great concern regarding not only the current risk of flooding but also the future risk of increased flooding due to sea level rise. Flooding has the potential to cause floatation, lateral movement, and even collapse of mobile homes. Building in this manner is considered unsafe for residents due to the future vulnerability of this particular location. Roads are essential for first responders in the event of an emergency and could become impassable during flooding events. It is noteworthy that the 100-year floodplain is currently considered to be Out of Play in New Castle County, Kent County, and several municipalities due to these types of risks.

Code Requirements/Agency Permitting Requirements

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

- The site access on all State maintained roads 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 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 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 requirements of the Development Coordination Manual this proposed project will qualify for the Area Wide Study Fee (AWSF). Please contact our office to proceed with this calculation.

- 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 30 feet of right-of-way from the physical centerline of Cedar Street. The following right-of-way dedication note is required, "**An 30-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. 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 Cedar Street.

- In accordance with Section 5.4 of the 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 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.

Special Flood Hazard Area
According to the newest Flood Insurance Rate Maps (FIRM), approximately 95% of this parcel is situated within a 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. 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. Structures and features such as ingress/egress, internal roadways, and lots with mobile homes are proposed within the floodplain. Homeowners with mortgages for homes within the floodplain may be required to purchase flood insurance.

- 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/

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/

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:

1. A building permit is issued on or after January 1, 2024 (single family), or
2. 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.

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/

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

- There are no known archaeological sites or known National Register-listed or eligible properties on the parcel. Soils are well drained. Nearby bodies of water are saltwater. Multiple precontact sites are nearby mostly along the coast with one listed in the National Register of Historic Places. The project area has a moderate to high potential for precontact archaeological resources. The Delaware SHPO is recommending an archaeological survey prior to any ground disturbing 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
This document is for information purposes only and does not constitute any type of approval from the Delaware State Fire Marshal's Office.

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:

- 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 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:

- NFPA 501A will apply and needs to be incorporated into the site plan for approvals. Currently the DE State Fire Prevention Regulations adopt the 2021 edition. On January 1 2026 the adopted edition will become 2025.

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 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-round.

- 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

- 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 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/

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

Potential Public Health and Safety Hazards Related to Sea Level Rise and Floodplains
All 98 mobile home lots and internal roadways are proposed within the 100-year (1% annual chance) floodplain, designated as Special Flood Hazard Area zone AE. Approximately 90% of the lots are proposed in a significantly low-lying area, according to LiDAR data.

Of these, 95 lots and roadways are also vulnerable to permanent inundation from sea level rise. This represents 97% of the proposed residences. By 2050, mean sea levels are projected to rise by 0.7 – 1.9 feet; by end of century sea levels are projected to increase by 1.7 – 5.0 feet. As mean sea levels rise, the frequency and severity of tidal flooding events is expected to increase, and permanent inundation is projected to occur.

Locating primary access routes and residences in these vulnerable areas may put property, infrastructure, and lives at risk. Flooding has the potential to cause floatation, lateral

movement, and even collapse of mobile homes. Likewise, there is no guarantee of public funding for future repairs or drainage projects.

DNREC reviewers encourage consideration of the following to mitigate flood and storm surge concerns:

- Locate all structures outside of the floodplain.

- It is not recommended to place in the floodplain roadways that 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.

- DNREC reviewers recommend that hydrologic and hydraulic engineering analyses are conducted for this site. These studies will determine base flood elevations and floodway delineations.

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/

Water Quality
This site lies within the Rehoboth Bay 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.

- 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.

- Consider installing a vegetated buffer along Dover Drive to help increase infiltration and encourage deposition of particulates where water may enter the property from a channel to the east.

- 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/

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.

- This site lies within Sussex County. Ambient air quality in this area may not meet Federal Air Quality Standards.

- 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 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

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

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

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

- According to DSHA's Housing Reform Map, this project is in a Distressed area. This map shows the distribution of affordable housing throughout the state. We encourage the creation of housing in Distressed Areas to be affordable, diverse, and compact as there is little to none. As this project is adding more homes in a compact affordable mobile home park, and this parcel is mainly level 3 investment level, we have no objections.

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 fire department is obligated to provide fire and EMS service to this property. Additional new development within their fire/EMS district has put a financial strain on the volunteer fire service. In order to provide quality service within the fire/EMS district the fire department may have to hire career staff to keep up with the demand of service. Currently State and County funding is not keeping up with the growth of the fire district and the burdens placed on the volunteer fire department. The developer and future residents will need to consider financial support, before this becomes a tax burden. Volunteerism is dwindling so future residents need to consider joining the fire department to serve their new community.

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:

- Sussex County Planning & Zoning Comments
- Sussex County Engineering Department Comments
- Sussex County Community Development & Housing Comments

JAMIE WHITEHOUSE, AICP MRTPI
PLANNING & ZONING DIRECTOR
(302) 855-7878 T
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jamie.whitehouse@sussexcountyde.gov

Sussex County
DELAWARE
sussexcountyde.gov

Preliminary Land Use Service (PLUS) Meeting
October 29, 2025
October PLUS Comments
Sussex County Department of Planning & Zoning

I. Review and Discussion: Bay City Mobile Home Park Expansion (2025-10-04)

Location: North side of Long Neck Road (Route 23) at the intersection of Long Neck Road (Route 23) and White House Road and on the eastside of Main Street in the existing Bay City Manufactured home Park (MHP)

Project: Review of a proposed plan for an additional (98) home sites to an existing mobile home park on a on a (20) acre portion of a Parcel comprised of a total of (180.0) acres +/-.

Sussex County Department of Planning & Zoning Comments

The applicant is required to participate in a pre-application meeting with the County. Please contact the Planning and Zoning Department to schedule a pre-application meeting with staff to discuss the proposed project by calling (302) 855-7878 or you may reach out to the Planning & Zoning Office at pandz@sussexcountyde.gov.

Following submission to the County, staff will review the Preliminary Site Plan, where more detailed comments will be provided to the Applicant. At the PLUS stage of review, staff wish to limit comments to high-level comments only.

Please note that the following are informal staff comments, and do not prejudice any decision that the Sussex County Planning & Zoning Commission may wish to make as part of any application submitted to the Department.

Tax Parcel ID(s): 234-24.00-34.00

Proposed: The project proposes an expansion of the existing Manufactured Home Park (MHP) comprised of an additional (98) sites to the existing (325) sites permitted, for a total of (423) Home sites on a (20) acre portion of a Parcel comprised of a total of (180) acres +/-.

Zoning: The parcel is currently zoned Agricultural Residential (AR-1). Bay City is a Manufactured Home Park (MHP) that has expanded via various Conditional Use Approval s since the early 1970's. (CU 109 in 1973, CU 612 in 1981, & CU 662 in 1982). Additionally, P&Z has an approved Site Plan on file from 2009. The Applicant's PLUS Application Plan indicates (325) existing homes sites. County Staff would seek to coordinate with an Applicant to verify the current number of approved sites in the MHP at the Pre App Meeting stage.

Density: N/A

Applicability to Comprehensive Plan: Applicability to Comprehensive Plan: The Parcels lie within the Growth Area classification of "Coastal Area" (per the 2018 Comprehensive Plan). Coastal Areas are growth areas that the County encourages only the appropriate forms of concentrated new development, especially when environmental features are in play. The Coastal Area designation is intended to recognize the characteristics of both anticipated growth and ecologically important and sensitive characteristics. The Plan notes Coastal Areas contain "ecologically important and sensitive characteristics as well as other coastal lands which help to absorb floodwaters and provide extensive habitat for native flora and fauna. This area also has significant impact upon water quality within the adjacent bays and inlets as well as upon natural the region's various habitats" (2018 Sussex County Comprehensive Plan, 4-15).

The Plan notes, "A range of housing types should be permitted in Coastal Areas, including single-family homes, townhouses, and multi-family units" and in terms of density, the "base density of 2 units per acre is appropriate throughout this classification" (2018 Sussex County Comprehensive Plan, 4-16). Additionally, in terms of density the Plan notes:
Medium and higher density could be supported in areas:

- *Where there is central water and sewer*
- *Near sufficient commercial uses and employment centers*
- *Where it is in keeping with the character of the area*
- *Where it is along a main road or at/or near a major intersection*
- *Where there is adequate Level of Service*
- *Or where other considerations exist that are relevant to the requested project and density*

(2018 Sussex County Comprehensive Plan, 4-16).

Please note, as the Parcel is in the Coastal Area designation, an Environmental Assessment & Public Facility Evaluation Report (EAPFR) is required with the submission of any application of this type (§115-194.3(B)(2)).

Open Space Provisions: N/A

Interconnectivity: Staff encourage interconnectivity between proposed developments in order to prevent only one-way-in, one-way-out access in the event that an emergency should occur on the property in the future. Staff recommend that any site plan to be submitted include connectivity with adjacent Parcels with frontage on Long Neck Road.

Transportation Improvement District (TID): N/A

Agricultural Areas: The site is located within the vicinity of parcels which appear to be actively farmed. Please include on any plans submitted the Agricultural Use Protection notice located in (§99-6(G)(1)) of the County Code. This language shall also be included within any subsequent deed restrictions, leases, or agreements of sale for the property. Staff note that any proposed setbacks/BRLs will be required to meet the (50) foot setback requirements for major

subdivisions adjacent to land used primarily for agricultural purposes (§99-6(G)(2)) where applicable.

Forested Areas: N/A

Wetlands/Waterways: N/A

Site Considerations (Flood Zones, Tax Ditches, Groundwater Recharge Potential etc.): The parcel is located within Flood "AE" Special Flood Hazzard Area as indicated in the applicant's Conceptual Land Use Plan. This is accurate according to current data available to Sussex County Planning & Zoning. Staff note there are no Wellhead Protection Areas on the site. The Parcel is within areas of "Good" and "Fair" Groundwater Recharge. Please note this on any plans in order to comply with the provisions of Chapter 89 "Source Water Protection" of the Sussex County Code (§89-7).

PLUS

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Preliminary Land Use Service (PLUS) Meeting
Meeting will be conducted on-line and in person
Room 133, Haslet Armory
122 Martin Luther King Jr. Blvd., South
Please see https://publicmeetings.delaware.gov/ for link to on-line access
October 29, 2025

Applicants should arrive at least 15 minutes before their appointed time. Times are approximate and are subject to change.

Public comment will be heard at the end of each PLUS application after the State Agencies have shared their comments with the applicants. Each person wishing to comment on the application under review will have up to 3 minutes.

I. 8:30 AM **Pre-Meeting Discussion – PLUS Reviewers**

II. 9:00 AM **Review and Discussion: Boyd's Corner Preserve (2025-10-07)**
County: New Castle **Municipality:** Unincorporated
Location: North side of Burbage Road, approximately 1,800' east of intersection with Powell Farm Road.
Project: Review of a proposed residential subdivision consisting of 165 detached single-family dwelling units on 90.6 acres. The site is classified as State Strategies Levels 1 and 2, zoned S (Suburban), and is currently used as farm field.

III. 9:30 AM **Review and Discussion: Project Washington – South Campus (2025-10-02)**
County: New Castle **Municipality:** Unincorporated
Location: 825 Governor Lea Road, New Castle, DE 19720
Project: Review of a proposed major land development for six 500,000 SF, 72 MW data center buildings with supporting site and electrical infrastructure. Data centers on parcel 12-002.00-025. This site is 195 acres currently zoned Heavy Industrial/Commercial Regional (Parcel 12-002.00-025), Suburban (Parcel 10-049.00-073). The site is classified as State Strategies Levels 3, 4 and Out of Play.

IV. 10:00 AM **Review and Discussion: Warehousing Ordinance (2025-10-08)**
County: New Castle **Municipality:** Unincorporated
Location: County wide
Project: review of a proposed local government ordinance to amend New Castle County Code Chapter 40, Article 3, Article 4, Article 11 and Article 33, Regarding Truck Terminals, Warehouses, Fulfillment Centers and Distribution Centers.

V. 10:15 AM **Review and Discussion: Town of Clayton 2025 Comprehensive Plan Update (2025-10-01)**

County: Kent **Municipality:** Clayton
Location: Town of Clayton
Project: Review of a complete update to the Town of Clayton's 2019 Comprehensive Plan.

VI. 10:45 AM **Review and Discussion: Cedarcrest (2025-10-10)**
County: Sussex **Municipality:** Unincorporated
Location: County Seat Highway at Warrington Road
Project: Review of a proposed major cluster subdivision of 650 units on 471.6 acres classified as State Strategies Level 3 & 4 and zoned as AR-1 (Agricultural Residential District).

The proposed project is located within a Tier 4 area for wastewater planning. Sussex County does not currently have a schedule to provide sanitary sewer to this project. The Sussex County Engineering Department recommends the project receive wastewater service from a public utility or municipality.

The Sussex County Engineering Department recommends that all subdivision streets meet or exceed Sussex County Standards.

For questions regarding these comments, contact Chris Calio, Sussex County Engineering Department at (302) 855-7370.

VII. 11:15 AM **Review and Discussion: Goldsboro Farm (2025-10-06)**
County: Sussex **Municipality:** Unincorporated
Location: West side of Mulberry Knoll Road, approximately 3,000 feet south of John J. Williams Highway (Rt. 24).
Project: Review of a proposed 307-unit single family residential cluster subdivision on 257 acres. The area is currently used for agricultural purposes, is zoned AR-1 (Agricultural Residential District) and classified as State Strategies Levels 2, 3, 2 and Out of Play.

The proposed project is located within a Tier 2 area and is contiguous to the Sussex County Unified Sanitary Sewer District. Annexation and connection to the sewer system is required.

A "Use of Existing Infrastructure Agreement" is required for new projects. Sussex County Code, Chapter 110, requires that the Engineer and/or Developer request a Sewer System Concept Evaluation (SSCE) from the Utility Planning & Design Review Department for the project by providing the parcel(s) estimated equivalent dwelling units (EDU) for the project, along with payment of a $1,000.00 fee for the evaluation and must be approved prior to approval of construction plans. The fee is to be payable to Sussex County Council. The Department will review the parcel(s) and EDU, confirm capacity, provide the connection point and define any additional parcels that must be served as part of the project. Should it be determined that a pump station is required for the project, additional information may be requested. This information will be conveyed to the engineer and/or developer. The Department will use this information when reviewing construction drawings to verify that the correct connection point is used, and all required parcels are served.

The proposed development will require a developer installed collection system in accordance with Sussex County standards and procedures.

One-time system connection charges will apply. Please contact the Utility Permits Division at 302 855-7719 for additional information on charges.

The Sussex County Engineering Department recommends that all subdivision streets meet or exceed Sussex County Standards.

For questions regarding these comments, contact Chris Calio, Sussex County Engineering Department at (302) 855-7370.

VIII. 11:45 AM **Review and Discussion: Robbins Property (2025-10-09)**
County: Sussex **Municipality:** Unincorporated
Location: Northwest corner of Shawnee Road at Old Shawnee Road.
Project: Review of a proposed 105 single family lot subdivision on 150.6 acres and zoned as AR-1 (Agricultural Residential District). This area is classified as State Strategies Level 2, 3 and 4.

The proposed project is located within a Tier 4 area for wastewater planning. Sussex County does not currently have a schedule to provide sanitary sewer to this project. The Sussex County Engineering Department recommends the project receive wastewater service from a public utility or municipality.

The Sussex County Engineering Department recommends that all subdivision streets meet or exceed Sussex County Standards.

For questions regarding these comments, contact Chris Calio, Sussex County Engineering Department at (302) 855-7370.

IX. 12:15 PM **Lunch Break – switching to Room 307 for the rest of the PLUS Agenda**

X. 1:00 PM **Review and Discussion: Bay City Mobile Home Park Expansion (2025-10-04)**
County: Sussex **Municipality:** Millsboro
Location: Cedar Street, Millsboro, DE 19966
Project: Review of a proposed site plan to add an additional 98 home sites to an existing mobile home park. The site is classified as State Strategies Levels 3, 4 and Out of Play; and zoned AR-1 (Agricultural Residential District).

The proposed project is located within a Tier 1 area within the Sussex County Unified Sanitary Sewer District and connection to the sewer system is mandatory.

A "Use of Existing Infrastructure Agreement" is required for new projects. Sussex County Code, Chapter 110, requires that the Engineer and/or Developer request a Sewer System Concept Evaluation (SSCE) from the Utility Planning & Design Review Department for the project by providing the parcel(s) estimated equivalent dwelling units (EDU) for the project, along with payment of a $1,000.00 fee for the evaluation and must be approved prior to approval of construction plans. The fee is to be payable to Sussex County Council. The Department will review the parcel(s) and EDU, confirm capacity, provide the connection point and define any additional parcels that must be served as part of the project. Should it be determined that a pump station is required for the project, additional information may be requested. This information will be conveyed to the engineer and/or developer. The

Department will use this information when reviewing construction drawings to verify that the correct connection point is used, and all required parcels are served.

The proposed development will require a developer installed collection system in accordance with Sussex County standards and procedures.

One-time system connection charges will apply. Please contact the Utility Permits Division at 302 855-7719 for additional information on charges.

The Sussex County Engineering Department recommends that all subdivision streets meet or exceed Sussex County Standards.

For questions regarding these comments, contact Chris Calio, Sussex County Engineering Department at (302) 855-7370.

XI. 1:30 PM **Review and Discussion: DuPont Properties, LLC (2025-10-03)**
County: Sussex **Municipality:** Unincorporated
Location: 32581 DuPont Blvd., Dagsboro, DE 19975
Project: Review of a proposed site plan for multiple offices and warehouses on 9.86 acres, zoned C-1 (General Commercial District) and GR-1 (General Residential District) and is classified as State Strategies Level 2.

The proposed project is located within a Tier 1 area within the Sussex County Unified Sanitary Sewer District and connection to the sewer system is mandatory.

A "Use of Existing Infrastructure Agreement" is required for new projects. Sussex County Code, Chapter 110, requires that the Engineer and/or Developer request a Sewer System Concept Evaluation (SSCE) from the Utility Planning & Design Review Department for the project by providing the parcel(s) estimated equivalent dwelling units (EDU) for the project, along with payment of a $1,000.00 fee for the evaluation and must be approved prior to approval of construction plans. The fee is to be payable to Sussex County Council. The Department will review the parcel(s) and EDU, confirm capacity, provide the connection point and define any additional parcels that must be served as part of the project. Should it be determined that a pump station is required for the project, additional information may be requested. This information will be conveyed to the engineer and/or developer. The Department will use this information when reviewing construction drawings to verify that the correct connection point is used, and all required parcels are served.

The proposed development will require a developer installed collection system in accordance with Sussex County standards and procedures.

One-time system connection charges will apply. Please contact the Utility Permits Division at 302 855-7719 for additional information on charges.

The Sussex County Engineering Department recommends that all subdivision streets meet or exceed Sussex County Standards.

For questions regarding these comments, contact Chris Calio, Sussex County Engineering Department at (302) 855-7370.

XII. 2:00 PM **Review and Discussion: Banks Irons Lane (2025-10-05)**
County: Sussex **Municipality:** Unincorporated
Location: West side of Irons Lane at the intersection of Old Mill Road.

Project: Review of a proposed residential subdivision consisting of 115 single-family dwelling units on 55 acres. The site is classified as State Strategies Levels 2 & 3, and zoned AR-1 (Agricultural Residential District).

The project is within a Tier 2 area for wastewater planning. Sussex County does not currently have a schedule to provide sanitary sewer to these parcels.

The proposed project is not contiguous to the existing Sussex County Unified Sanitary Sewer District (SCUSSD) boundary and intervening parcel(s) will be necessary to annex into the District. Further information will be provided during the Sewer System Concept Evaluation (SSCE).

The Sussex County Engineering Department recommends that all subdivision streets meet or exceed Sussex County Standards.

For questions regarding these comments, contact Chris Calio, Sussex County Engineering Department at (302) 855-7370.

The agenda items times are approximate and subject to change. This agenda is subject to change to include additional items or the deletion of items which arise at the time of the meeting.

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Sussex County
DELAWARE
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October 29, 2025

Mr. Neil Sander
Independence Engineering, LLC
123 Farnsworth Ave.
Bordentown, NJ 08505

RE: PLUS Review (PLUS 2025-10-04) – Bay City Mobile Home Park Expansion

Dear Mr. Sander,

Sussex County endeavors to promote non-discrimination and affordable housing whenever possible throughout the County. In this regard, the developer and associated financial institutions are encouraged to provide and finance affordable housing opportunities to Sussex County residents in all new developments, and affirmatively market those affordable housing units to diverse populations.

For questions about opportunities available for affordable housing projects within Sussex County, please consult Sussex County's "Affordable Housing Support Policy". The policy along with other resources are available on the County's Affordable & Fair Housing Resource Center website: www.sussexcountyde.gov/affordable-and-fair-housing-resource-center. The County's Community Development & Housing Department can advise about existing affordable housing opportunities in Sussex County and the appropriate County Department to contact regarding specific development issues concerning future affordable housing projects within Sussex County.

The Community Development & Housing Department can also explain and assist with any financial support or incentives that may be available to a project from federal, state, and county sources, as well as private funding sources that also promote affordable housing in Sussex County. **Please visit www.sussexcountyde.gov/housing-trust-fund for information on the County's Housing Trust Fund.**

Further, the County's newly approved Work Force Housing Zoning Ordinance permits up to 12 units per acre, by right, in eligible areas for projects that set aside 25% of the total units for affordable rentals. For more information on eligibility and design criteria, please review the Ordinance at www.sussexcountyde.gov/affordably-priced-rental-units . The application can be found on the Planning & Zoning website at https://sussexcountyde.gov/sites/default/files/forms/SussexCountyRentalProgram_Application.pdf .

Please understand that all residential projects, including Affordable Housing Projects are subject to the applicable provisions of the Sussex County Subdivision and Zoning Codes, and the approval processes set forth in those Codes.

On behalf of Sussex County, we look forward to cooperating with you and your project as it moves forward.

Thank you,



Brandy B. Nauman
Director