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

June 25, 2026

Morris & Ritchie Associates, Inc.
Attn: Chris Flathers
111 Ruthar Drive
Newark, DE 19711

RE: PLUS review – 2026-05-03; Traditions of America at Lewes

Dear Mr. Flathers:

Thank you for meeting with State agency planners on June 3rd, 2026 to discuss Traditions of America at Lewes. According to the information received, you are seeking review of a proposed 55+ residential community comprised of 302 detached single-family dwellings and community amenity area.

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

This project represents a major land development that will result in 302 single family homes in a +55 age restricted community in an Investment Level 4 area according to the *2025 Strategies for State Policies and Spending*. This project is also located in Low Density according to the Sussex County comprehensive plan.

Investment Level 4 indicates where State investments will support agricultural preservation, natural resource protection, and the continuation of the rural nature of these areas. New development activities and suburban development are not supported in Investment Level 4. These areas are comprised of prime agricultural lands and environmentally sensitive wetlands and wildlife habitats, which should be, and in many cases have been preserved. For example, this project is contiguous to several hundred acres of farmland that has been preserved through our Agland preservation program.

From a fiscal responsibility perspective, development of this site is likewise inappropriate. The cost of providing services to development in rural areas is an inefficient and wasteful use of the State's fiscal resources. Over the longer term, the unseen negative ramifications of this development will become even more evident as the community matures and the cost of maintaining infrastructure and providing services increases.

Please note the following comment from Lewes Fire Department:

- The Lewes Fire Department Inc. is obligated to provide Fire and EMS service to this property, however, additional new developments in our Fire and EMS district have put financial strain on the volunteer fire service. In order to provide quality service within our fire district the Lewes fire department has had to hire more career staff to man the EMS units and fire apparatus as needed, thus creating a combination fire department. In 2017 the Lewes fire department responded to approximately 500 fire calls and 3000 EMS calls. In 2024 the Lewes fire department responded to an estimated 1200 fire calls and 7000 EMS calls. State and County funding does not keep up with the growth of the Lewes fire district, so the developer and future residents need to help financially support the Lewes Fire Department Inc. before we can support any more development in our Fire and EMS district. Future residents need to consider joining the fire department to serve their new community.

In addition, the development of this site may be environmentally inappropriate due to the following:

- Maps from the Statewide Wetlands Mapping Project indicate the potential presence of non-tidal wetlands in the eastern and western portions of the site. The application proposes to disturb approximately 4 acres of non-tidal wetlands.
- The proposed development is near a property enrolled in the State's Agricultural Lands Preservation Program (White Meadows District S-96-03-074-3 parcel # 234-5.00-48.00), where agricultural operations are legally protected and prioritized
- Hopkins Road has a functional classification of a local road. Local roads serve to connect areas to higher functional classifications of roadways. This project has the potential to overburden the local road.
- 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.
- The preliminary plan proposes the elimination of approximately 2 of 5 acres of forest on the site. An analysis of historical data indicates that the forest area located on the western portion of the site has likely maintained some degree of forest cover since 1937

and could be considered mature forest. Mature forests possess the potential for rare, threatened, or endangered species that rely on this type of habitat. Forests filter water for improved water quality, provide habitat for wildlife, absorb nutrients, infiltrate stormwater, moderate temperatures, and store atmospheric carbon which would otherwise contribute to climate change.

Because the development is inconsistent with the Strategies for State Policies and Spending, the Department is opposed to this subdivision.

The comments in this letter are technical and are not intended to suggest that DNREC supports this development proposal. This letter does not in any way suggest or imply that you may receive or may be entitled to permits or other approvals necessary to construct the development you indicate or any subdivision thereof on these lands.

Code Requirements/Agency Permitting Requirements

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

- As discussed in the PLUS meeting the 2 southern most proposed entrances on to Hopkins Road depicted in the site plan will need to be eliminated.

- Hopkins Road is a state-owned and state-maintained road. As such, any access point onto Hopkins Road 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 may require a Traffic Impact Study (TIS). The final determination on whether a TIS will be required will be determined through the pre-submittal and scoping process.

- 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 all State maintained roads. The following right-of-way dedication note is required, "**A 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 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.

- Referring to Section 3.4.2.1 of the Development Coordination Manual, the following items, among other things, are required on the Record Plan:

    - A Traffic Generation Diagram. See Figure 3.4.2-a for the required format and content.

    - Notes identifying the type of off-site improvements, agreements (signal, letter) contributions and when the off-site improvements are warranted.

- In accordance with Section 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.

- 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.

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.

Wetlands and Waterways
Maps from the Statewide Wetlands Mapping Project indicate the potential presence of non-tidal wetlands in the eastern and western portions of the site. The application proposes to disturb approximately 4 acres of non-tidal wetlands.

- The wetlands are not mapped on the site plan. Include all wetland boundaries, streams, and waterways on site plans.

- If state jurisdictional wetlands are determined to exist on the site, contact the DNREC Wetlands and Waterways Section to determine which permits may be required.

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

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/

Wastewater Disposal Systems – Small Systems
An expired permit (permit # 165643) exists for this site in the Small System Branch database.

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

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

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/

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/

Delaware Department of Agriculture – Contact Milton Melendez 302-698-4500

- The Department of Agriculture categorically opposes this proposed development, viewing it as a direct threat to the long-term viability of Delaware's agriculture, forestry, and related industries. Introducing residential housing into a Level 4 area contradicts the intended land use policy and risks irreversible harm to the state's resource-based economy. This type of development brings with it increased public costs for infrastructure and services, all while undermining land uses that are crucial to Delaware's economic, environmental, and cultural heritage.

- Of particular concern is the fact that residents new to rural developments often lack familiarity with agricultural operations, which leads to avoidable conflicts over noise, odors, and farm equipment on rural roads. These conflicts not only compromise public health and safety but also endanger the protections and productivity of nearby preserved lands.

- The Department stresses that growth should occur within established urban areas and designated growth zones not in isolated rural locations. The proposed development is near a property enrolled in the State's Agricultural Lands Preservation Program (White Meadows District S-96-03-074-3 parcel # 234-5.00-48.00), where agricultural operations are legally protected and prioritized. Title 3, Del. C., Chapter 9 mandates that adjacent developments acknowledge and accommodate the realities of nearby farming activities through deed restrictions and disclosure requirements.

- The Department also notes that normal agricultural activities within Agricultural Preservation Districts are shielded from nuisance claims, ensuring that farmers can continue operations without legal interference from neighboring residential developments.

- Furthermore, if residential development proceeds, it would trigger additional regulatory concerns such as construction restrictions near preserved lands, as outlined in Section 4.01(A)(2) of the Delaware Regulations Governing the Construction and Use of Wells.

- While the Department remains open to collaboration with developers to mitigate potential impacts such as the installation of forested buffers it remains firmly opposed to this proposed comprehensive plan update because it facilitates inappropriate and harmful residential development in a Level 4 area. The Department calls on decision-makers to uphold the guiding principles of Delaware's land use strategies and protect its vital agricultural landscape for generations to come.

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

Proposed Project Parcel Flood Concern

- This parcel is located within an area of **Minimal Flood Concern of 1000 years or greater**.

Parcel Status within County Evacuation Zone Location

- The parcel is not yet located within a Sussex 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 or support development in Level 4 areas. The parcel has a high potential for historic archaeological resources. There was a historic agricultural complex on the property that was demolished. Historic agricultural complexes are often associated with historic unmarked family cemeteries. We request that the applicant be aware of the Unmarked Human Burials and Human Skeletal Remains Law (Del C. Title 7, Ch.54). The Delaware SHPO recommends 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

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 1000 gpm for 1-hour duration, at 20-psi residual pressure is required. Fire hydrants with 800 feet spacing on centers. (Assembly)

- 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.

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 Hopkins Road must be constructed so fire department apparatus may negotiate it.

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

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

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

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

Gas Piping and System Information:

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

Required Notes:

- Provide a note on the final plans submitted for review to read "All fire lanes, fire hydrants, and fire department connections shall be marked in accordance with the Delaware State Fire Prevention Regulations"
- Proposed Use
- Alpha or Numerical Labels for each building/unit for sites with multiple buildings/units
- Square footage of each structure (Total of all Floors)
- National Fire Protection Association (NFPA) Construction Type
- Maximum Height of Buildings (including number of stories)
- 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/

- Hopkins Road has a functional classification of a local road. Local roads serve to connect areas to higher functional classifications of roadways. This project has the potential to overburden the local road.

- It is suggested that the entrance on to Hopkins Road be evaluated for the possibility of including a crosswalk.

- This project is located in Investment Level 4 according to the 2025 State Strategies for Policy and Spending. In Investment Level 4 DelDOT prioritizes improving safety; ensuring effective regional travel between population centers; preserving corridor capacity; maintaining existing transportation facilities; and making enhancements that support the agricultural industry. This project is not in alignment with DelDOT priorities in the area and should be designed and built to best mitigate negative impacts.

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

The proposed development is located in Level 4 lands, according to the 2025 Delaware Strategies for State Policies and Spending. Level 4 lands are generally rural and are where the bulk of the state's open space, natural and cultural resources, and agricultural operations are located. Level 4 lands provide important ecosystem services to Delaware and its surroundings. As such, state investments in Level 4 lands are intended to retain and support the rural landscape, open spaces, and farmlands.

DNREC reviewers offer the following recommendations to help improve the environmental outcomes of this proposal. However, development in the manner that is proposed in this application is inconsistent with state policies for Level 4 lands and is not advised.

Stormwater Management

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

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

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

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

Drainage

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

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

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

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

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.

- 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/

Removal of Mature Forest within Delaware Ecological Network

The preliminary plan proposes the elimination of approximately 2 of 5 acres of forest on the site. An analysis of historical data indicates that the forest area located on the western portion of the site has likely maintained some degree of forest cover since 1937 and could be considered mature forest. Mature forests possess the potential for rare, threatened, or endangered species that rely on this type of habitat. Forests filter water for improved water quality, provide habitat for wildlife, absorb nutrients, infiltrate stormwater, moderate

temperatures, and store atmospheric carbon which would otherwise contribute to climate change.

- Removing forested areas for development, especially mature forests, should be avoided to the greatest extent possible.

- The forested area on this site occurs within the Delaware Ecological Network, a statewide network of interconnected lands having significant ecological value. Avoid disturbance within these habitats.

- In general, contiguous forest and connected areas of natural habitat are more beneficial to wildlife, allowing for safer movement from one area to another while reducing roadway mortality.

- To reduce impacts to nesting birds and other wildlife species that utilize forests for breeding, it is recommended that tree clearing not occur from April 1st to July 31st.

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

Aglands Preservation Districts
The proposed project lies adjacent to and shares property boundaries with an Aglands Preservation District (White Meadows District). Adjacent properties may be impacted.

- DNREC reviewers request that a 50-foot vegetated buffer is placed between this project and the Aglands Preservation District, to minimize any potential noise/dust nuisances coming from the farm. Buffers should be maintained with a mix of native species.

- Please reach out to the Delaware Department of Agriculture (DDA) for further information and requirements.

Contact: DDA Aglands Preservation and Planning Section at (302) 698-4530.
Website: https://agriculture.delaware.gov/agland-preservation-planning/

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. 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.

- Offer the option to install solar or geothermal systems for each home. This allows a purchaser to incorporate the cost into their mortgage, making it more affordable. For community facilities such as the proposed Amenity Center, 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.

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

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

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

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

Population
The county has a population density of 265.60 per square mile based on the US 2020 Census report; an increase from 2010 at 208.90 persons per square mile. The specific census block(s) the project is located on has a total population of 224, though, with development, this will undoubtedly change. The 17 adjacent blocks aggregated bring the area to a total population of 1,875.

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, Hal, 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.

Expected Annual Loss
× Social Vulnerability
÷ Community Resilience
= Risk Index

- 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 and its social vulnerability are rated as **relatively moderate.**

Renewable Energy Commitment

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

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

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.

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

Fire Department Comments:

- The Lewes Fire Department Inc. is obligated to provide Fire and EMS service to this property, however, additional new developments in our Fire and EMS district have put financial strain on the volunteer fire service. In order to provide quality service within our fire district the Lewes fire department has had to hire more career staff to man the EMS units and fire apparatus as needed, thus creating a combination fire department. In 2017 the Lewes fire department responded to approximately 500 fire calls and 3000 EMS calls. In 2024 the Lewes fire department responded to an estimated 1200 fire calls and 7000 EMS calls. State and County funding does not keep up with the growth of the Lewes fire district, so the developer and future residents need to help financially support the Lewes Fire Department Inc. before we can support any more development in our Fire and EMS district. 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

JAMIE WHITEHOUSE, AICP MRTPI
PLANNING & ZONING DIRECTOR
(302) 855-7878 T
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Sussex County
DELAWARE
sussexcountyde.gov

Preliminary Land Use Service (PLUS) Meeting
June 3, 2026
May PLUS Comments
Sussex County Department of Planning & Zoning

Review and Discussion: Traditions of America at Lewes (2026-05-03)
County: Sussex County
Municipality: Unincorporated
Location: Hopkins Road, Lewes, DE – approximately 4,500-ft south of Fisher Road intersection
Project: Review of a proposed 55+ residential community comprised of 302 detached single-family dwellings and a community amenity area within an AR-1 (Agricultural Residential Zoning District) comprised of approximately 150.1-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.

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 or County Council may wish to make as part of any application submitted to the Department.

Tax Parcel ID: 234-5.00-47.00

Proposed: The Plan proposes 302 single-family dwellings with a community amenity area, parking, sidewalks, internal roads, and stormwater management on one Parcel comprised of 150.1-acres +/-.

Zoning: The Parcel is currently zoned Agricultural Residential Zoning District (AR-1).

The Planning & Zoning Office will require more detailed site plan at the time of application submission per §115-83.25(F).

Density: The proposed density of ≈ 2.01 dwelling units per acre complies with Code requirements.

Applicability to Comprehensive Plan: Staff note that the Future Land Use Map Designation for the property is "Low Density" The 2018 Sussex County Comprehensive Plan outlines Zoning Districts by their applicability to each Future Land Use category. Under Table 4.5-2 "Zoning Districts Applicable to Future Land Use Categories," the proposed cluster-style subdivision is listed as an applicable zoning district in the Low Density (Sussex County Comprehensive Plan, 4-24).

Open Space Provisions: The proposed plan includes (73) acres +/- (out of a total of (150.1) acres) of open space which equates to approximately (49%) of the project site.

Interconnectivity: The Plan does include connectivity with an adjacent parcel as required under (§115-83.25(F)(4)(b)).

Transportation Improvement District (TID): The property is NOT located in the Henlopen Transportation District. (TID).

Agricultural Areas: Staff note that the proposal is within the proximity of areas which appear to be actively farmed. In consideration of this, staff request that the Plans and copies of any subsequent Deeds for the property include the Agricultural Use Protection Notice found in (§99-6(G)(1)) of the Sussex County Code.

Forested Areas: Staff appreciate efforts to conserve as many mature trees as possible on project sites.

Wetlands/Waterways: N/A

Site Considerations (Flood Zones, Tax Ditches, Groundwater Recharge Potential etc.): Per the County's Online Mapping System and data from the State of Delaware, there are no Tax Ditches or related Tax Ditch Rights-Of-Way on the property. Staff note that the subject property is located within areas of "Good" and "Fair" groundwater recharge and in Flood Zone "X" – Areas determined to be outside the 1% annual chance flood and outside the 500-year floodplain. Staff note that there are no Wellhead Protection Areas present on the site.

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
June 3, 2026

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: Traditions of America at Lewes (2026-05-03)**
County: Sussex Municipality: Unincorporated
Location: Hopkins Road, Lewes, DE – approx. 4,500' south of Fisher Road intersection.
Project: Review of a proposed 55+ residential community comprised of 302 detached single-family dwellings and community amenity area.

The project is within a Tier 3 area for wastewater planning. Sussex County does not currently have a schedule to provide sanitary sewer to these parcels. 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.

III. 9:30 AM **Review and Discussion: Hickory Manor (2026-05-06)**
County: Sussex Municipality: Unincorporated
Location: Hickory Manor Rd, near Omar Road intersection.
Project: Review of a proposed cluster subdivision of 98 single-family homes.

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 Sussex County Engineering Department recommends the project work to achieve a contiguous path to the existing District boundary and once the project receives land use approval request annexation into the Sussex County Unified Sanitary Sewer District (SCUSSD).

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

IV. 10:00 AM **Review and Discussion: South Bethany Comprehensive Plan Pre-Update (2026-05-02)**
County: Sussex Municipality: South Bethany
Location: South Bethany
Project: Pre-Update review of South Bethany's Comprehensive Plan.

The proposed project is a Comprehensive Land Use Plan Update for the Town of South Bethany.

3b. Wastewater: South Bethany is one of 13 Sewer Areas that use the South Coastal Regional Wastewater Treatment Facility operated by Sussex County. The treatment facility is located at Beaver Dam Road and has a capacity of 10 million gallons/day. Treated wastewater is discharged into the ocean, approximately one mile offshore at a location between Bethany Beach and Sea Colony.

Sussex County has recently rebuilt Pump Stations 13 & 21 and changed manholes in Bay View Park to sealed and gasketed manholes.

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

V. 10:30 AM **Review and Discussion: 1000 GBC Drive (2026-05-01)**
County: New Castle **Municipality:** Unincorporated
Location: 1000 GBC Drive, Newark, DE 19702
Project: Review of a proposed 137,900 GFA research and development facility site plan.

VI. 11:00 AM **Review and Discussion: NCC Parking Ordinance (2026-05-04)**
County: New Castle **Municipality:** Unincorporated
Location: New Castle
Project: Review of New Castle County's local government ordinance to amend code chapter 40 (Unified Development code) relating to parking.

VII. 11:15 AM **Review and Discussion: NCC Certification of Electrical Capacity Ordinance (2026-05-05)**
County: New Castle **Municipality:** Unincorporated
Location: New Castle
Project: review of New Castle County's local government ordinance to amend code chapter 40 (Unified Development Code), article 5 (Site Capacity and Concurrency Calculations) and Appendix 1 (Application and Plan Requirements) to require certification of electrical capacity.

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.