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

October 19, 2026

Davis, Bowen & Friedel, Inc.
Attn: W. Zachary Crouch, P.E.

RE: PLUS review – 2026-09-02; Coastal Passage

Dear Mr. Crouch:

Thank you for meeting with State agency planners on September 30th, 2026 to discuss Coastal Passage. According to the information received, you are seeking review of a proposed site plan for a community consisting of 1,387 dwelling units featuring a mixture of approx. 1,099 sale units and 288 apartments for rent.

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 is located in Levels 1-3 which is consistent with the 2025 Strategies for State Policies and Spending. Investment Level 1 reflects areas that are already developed in an urban or suburban fashion, where infrastructure is existing or readily available, and where future redevelopment or infill projects are expected and encouraged by State policy. This site is also located in the developing area within the Sussex County Comprehensive plan. Investment Level 2 reflects areas where growth is anticipated by local, county, and State plans in the near-term future. A small area near Ingrams Branch is Investment Level 3 which does 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. The Office of State Planning Coordination supports this project provided it meets the relevant codes and ordinances of the town.

With that said, It is also noted that this property is located within the Future annexation area of the Town of Milton Comprehensive plan with a future land use classification of LPD (Large Parcel Development). It is encouraged that the developer and the county coordinate with the Town of Milton so that growth on this parcel is compatible with the growth within the town.

It should be noted that DelDOT recently completed the Coastal Corridors Study and the SR 16 Corridor Study. This represents the Town of Milton's desire to make SR 16 into a mixed use "main street" through the town, with improved pedestrian and bicycle facilities, traffic calming, and safer access to properties along SR 16. DelDOT encourages the developer to incorporate features and recommendations from the Coastal Corridors Study and the SR 16 Corridor Study.

Code Requirements/Agency Permitting Requirements

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

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

- Pursuant to Section 1.3 of the 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.

- Traffic analysis for this site may be satisfied through several options. The location is in an area that will be in the future Milton TID. The TID is expected to become operational in the near future. If the applicant wishes to participate in the future TID, it will be necessary to annex into the Town of Milton. In the alternative, and based on the expected trip generation, this project will be subject to the new TIS threshold and future impact fees as required by House Bill 450.

- 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 40-foot wide strip of right-of-way from the centerline is hereby dedicated in fee simple to the State of Delaware, acting by and through the Delaware Department of Transportation."**

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

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

- Referring to Section 3.4.2.1 of the Development Coordination Manual, the following items 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.

- Section 3.5.4.2 of the Development Coordination Manual addresses requirements for Shared Use Paths (SUP) and sidewalks. For projects in Level 1 Investment Areas, installation of paths or sidewalks along the frontage on State-maintained roads is required. DelDOT anticipates requiring a SUP along the site frontages on Cedar Creek Road and Milton Ellendale Highway.

The Delaware Bayshore Byway is adjacent to this location. Byways are regulated in State Code at Title 17, Chapter 1, Sections 190-194 and Title 17, Chapter 11, Sections 1101-1120 with applicable amendments apply. Additional information on the Byways program is available at (302) 760-2254.

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

- DART will continue to monitor the plans and this project and our future realignment the Route 303/307 serving Milton as an effort to serve this site.

Department of Natural Resources and Environmental Control – Contact Beth Krumrine 302-735-3480
Staff from the Delaware Department of Natural Resources and Environmental Control (DNREC) reviewed the project submitted for PLUS review. The absence of comments regarding specific resources does not indicate that there are not additional constraints or environmental issues on site, nor does it indicate DNREC support of a project.

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/

Special Flood Hazard Area
According to the newest Flood Insurance Rate Maps (FIRM), the northwest corner of the site 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 A. 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. Although houses are proposed outside of the Special Flood Hazard Area (SFHA), some houses may still be required by lenders to purchase flood insurance, based on the proximity to the SFHA.

- As proposed, do not build within the 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/.

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

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/

Wetlands and Waterways
Maps from the Statewide Wetlands Mapping Project indicate the potential presence of non-tidal wetlands in the northwestern portion of the site, as well as a potential blue line stream located at the northwestern property boundary. The application indicates that wetlands have been delineated. The application states that the project does not propose direct impacts to the wetlands/waterways.

State Requirements:

- If plans change and wetlands are disturbed, please contact the Wetlands and Waterways Section for more information on permitting requirements.

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

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/

Electric Vehicle Charging Requirements
Electric vehicle charging infrastructure is now required for new residential construction in Delaware under 7 DE Admin. Code 2101 *Regulations for State Energy Conservation Code*, which incorporates Appendix RE – Electric Vehicle Charging Infrastructure with amendments. This requirement is effective April 11, 2026 and supersedes 16 Del. C. § 8001- § 8006, which sunset upon DNREC's publication of notice that Appendix RE meets or exceeds its standards. County and municipal building and plumbing codes must incorporate the updated code by April 11, 2027.

Requirements are summarized below. Consult 7 DE Admin. Code 2101, Appendix RE, directly for further details.

- For new one- and two-family dwellings with a designated attached or detached garage or other on-site private parking provided adjacent to the dwelling unit: parking shall be provided with one electric vehicle-ready space or electric vehicle supply equipment space per dwelling unit.

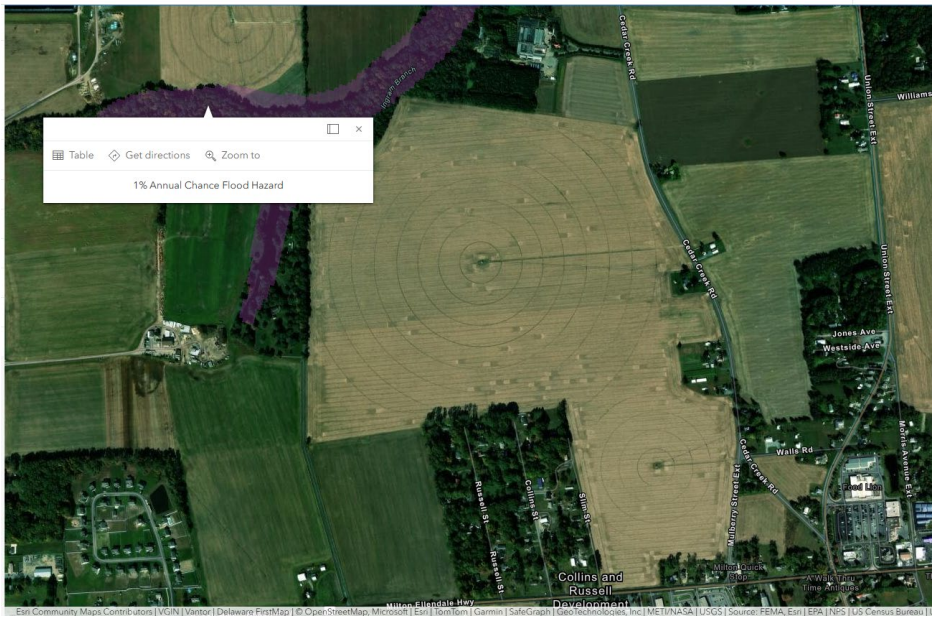
- For multi-family dwellings classified as R-2 occupancies by the International Building Code (IBC): parking shall be provided with an electric vehicle-ready space or electric vehicle supply equipment space for 20% of the dwelling units or parking spaces, whichever is less.
- Multi-family dwellings: At least 1 electric vehicle equipment supply space must be in an area available for use by all residents of the R-2 occupancy. The electric vehicle equipment supply space must be accessible by an individual with a disability.
- Multi-family dwellings: Construction documents must indicate the location of proposed electric vehicle supply equipment spaces and electric vehicle-ready spaces.

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

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

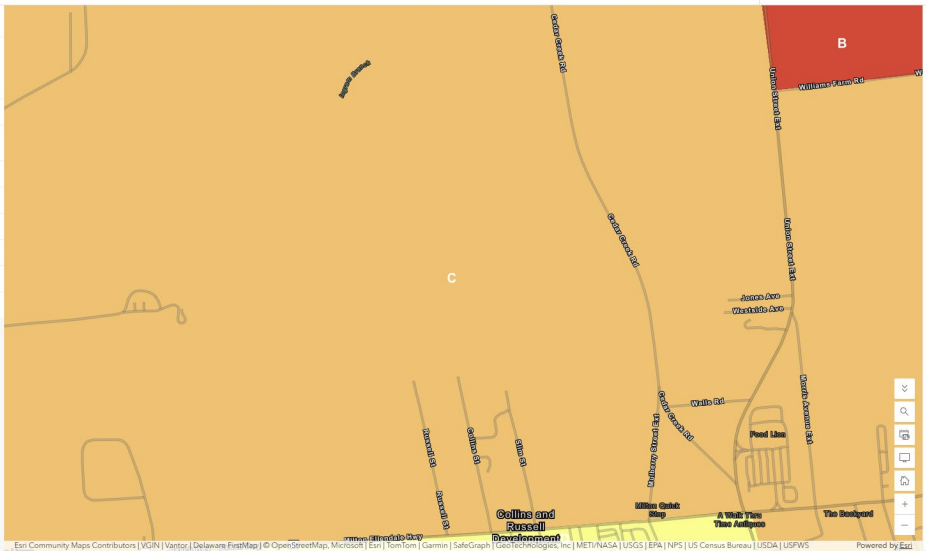
Proposed Project Parcel Flood Concern

- This parcel is located within an area of **Minimal Flood Concern of 1000 years or greater**. However, there is a 100-year floodplain to the Northeast of the parcel.



Parcel Status within County Evacuation Zone Location

- The parcel is located within Sussex County Evacuation Zone C.



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

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

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

- There are multiple historic properties within the project area in various states of repair, along with at least two demolished historic agricultural complexes.
- Soils are primarily well-drained, and the project area is bordered to the north by Ingram Branch. There is also a proposed cemetery outside of the project area to the north.
- While there are no archaeological sites in the vicinity, the area has not been heavily surveyed. The area has a moderate to high potential for archaeological resources. Therefore, the Delaware SHPO recommends an archaeological survey prior to ground disturbance activities.
- Historic agricultural complexes are often associated with historic family cemeteries and unmarked burials. SHPO requests that the applicant review the Delaware Unmarked Human Burials and Skeletal Remains Law (Delaware Code: Title 7, Chapter 54), which addresses the process around the treatment and disposition of unmarked human burials that are inadvertently discovered. The law also prohibits any failure to report their discovery.
- If there is federal involvement, in the form of licenses, permits, or funds, the federal agency, often through its client, is responsible for complying with Section 106 of the National Historic Preservation Act (36 CFR 800) and must consider their project's effects on any known or potential cultural or historic resources. For further information or additional details pertaining to the Section 106 process and the Advisory Council's role; please review the Advisory Council's website at the following: https://www.achp.gov/protecting-historic-properties/section-106-process/introduction-section-106

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

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

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

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

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

Fire Protection Features:

- All structures over 10,000 Sq. Ft. aggregate will require automatic sprinkler protection installed.

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

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

- Show Fire Lanes and Sign Detail as shown in DSFPR

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

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

Gas Piping and System Information:

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

Required Notes:

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

- Proposed Use
- Alpha or Numerical Labels for each building/unit for sites with multiple buildings/units
- Square footage of each structure (Total of all Floors)
- National Fire Protection Association (NFPA) Construction Type
- Maximum Height of Buildings (including number of stories)
- Townhouse 2-hr separation wall details shall be shown on site plans
- Note indicating if building is to be sprinklered
- Name of Water Provider
- Letter from Water Provider approving the system layout
- Provide Lock Box Note (as detailed in DSFPR) if Building is to be sprinklered
- Provide Road Names, even for County Roads

Recommendations/Additional Information

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

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

- The applicant should expect a requirement that all PLUS and Technical Advisory Committee (TAC) comments be addressed prior to submitting plans for review.
- Please be advised that the Standard General Notes have been updated and posted to the DelDOT website. Please begin using the new versions and look for the revision dates of March 21, 2019 and March 16, 2021. The notes can be found at https://www.deldot.gov/Business/subdivisions/
- The Delaware Department of Transportation (DelDOT) reviews project proposals submitted through the Preliminary Land Use Service (PLUS) to ensure they are compatible with nearby public-use airports. As part of this process, DelDOT evaluates land use and development to help protect public safety and support safe and efficient aircraft operations to preserve the long-term economic viability of the airport. Based on the proposal review for compatibility with nearby public-use airports, the proposed mixture dwelling units fall within the outer transitional surface

of Delaware Coastal Airport, as defined by Federal Aviation Regulation (FAR) Part 77 Imaginary t. The objective of the outer transitional surface is to protect aircraft maneuvering areas adjacent to runways while allowing compatible development to ensure the safety of the people and the infrastructure. This area should be considered in land use planning to ensure appropriate development heights, maintain community safety and quality of life, and support long-term compatibility between surrounding land uses and airport operations. For additional information regarding this determination and its implications for planning and development, please contact: Gena Eleias at gena.eleias@delaware.gov (302)760-2110 or Bruce Allen at bruce.allen@delaware.gov.

- Cedar Creek Road and Milton-Ellendale Highway both have the functional classification of a major collector. Major collectors serve to enable intra-county travel. This project may place considerable strain on the surrounding transportation infrastructure without participation in the proposed Milton Transportation Improvement District.

- This project is located primarily in Investment Level 1 according to the 2025 State Strategies for Policy and Spending. In Investment Level 1 DelDOT prioritizes improving safety; expanding access to transit, pedestrian, and bicycle facilities; supporting economic development; and strengthening connections among existing, redeveloping, and new neighborhoods, public facilities, and commercial areas. This project is in alignment with those policy goals.

- DelDOT recently completed the Coastal Corridors Study and the SR 16 Corridor Study. This represents the Town of Milton's desire to make SR 16 into a mixed use "main street" through the town, with improved pedestrian and bicycle facilities, traffic calming, and safer access to properties along SR 16. DelDOT encourages the developer to incorporate features and recommendations from the Coastal Corridors Study and the SR 16 Corridor Study.

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

Specific Drainage Concerns
Drainage issues and flooding events have been documented on properties adjacent to this site.

- All precautions should be taken to ensure the project does not hinder any off-site drainage upstream or create any off-site drainage problems downstream due to increases in stormwater.

- The potential for off-site drainage impacts and potential limitations on downstream conveyance should be evaluated as part of the project.

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/

General Recommendations for 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.

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

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

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/

Special Flood Hazard Area

- As proposed, locate all structures outside of the floodplain. If this is not possible, the developer should consider designing structures to a higher standard to avoid potential future flood damage and loss.

- For subdivision and development proposals containing at least 50 lots or at least 5 acres (whichever is the lesser) proposed in FEMA-delineated Special Flood Hazard Areas where base flood elevation data are not available, DNREC reviewers recommend that hydrologic and hydraulic engineering analyses are conducted. These studies will determine base flood elevations and floodway delineations.

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

Forested Wetlands within Delaware Ecological Network, Vegetated Buffer Zones
Maps from the Statewide Wetlands Mapping Project indicate the potential presence of forested wetlands on the northwestern portion of the site. This habitat type is known to support an array of plants and animals, most notably wetland dependent species such as amphibians.

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

- As proposed, do not disturb forested wetlands. Maintain an upland buffer of at least 100 feet along all wetlands, waterways, and sensitive habitats, including those containing existing forest or natural vegetative cover.
- The wetlands and surrounding forest on this site occur within the Delaware Ecological Network, a statewide network of interconnected lands having significant ecological value. As proposed, avoid disturbance within these habitats.
- Vegetated buffer zones should be identified outside of the Limit of Disturbance on the engineering plans.
- Maintain vegetated buffer zones as native species meadows or forest.
- Vegetated buffer zones should be deeded as community open space and not contained within any lot lines. Signage should be installed at the edge and within the buffer zones to deter residents from encroaching into these common areas.
- Maintain habitat connections to undeveloped open space, which are especially important for species movement across the landscape.

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

State of Delaware Endangered Species
The Delmarva fox squirrel (*Sciurus niger cinereus*), a State of Delaware endangered species, has been documented near the project area.

- As proposed, do not disturb existing forest on-site. Specifically, nut and mast producing trees such as oaks, hickories, and beech are important food sources for Delmarva fox squirrels.
- Provide wooded strips within the development and within the perimeter buffer, so squirrels that have entered the development can use the trees to safely return to the adjacent forest.
- Consider using signs or speed restrictions to inform motorists to be on the lookout for squirrels and to avoid squirrel mortality.
- If Delmarva fox squirrels are present on the site and the above recommendations are not possible, consider allowing DNREC's Division of Fish and Wildlife to trap, remove and relocate squirrels prior to clearing forest.
- For more information on practices that can support the Delmarva fox squirrel, refer to the Delmarva Fox Squirrel Conservation Plan at https://documents.dnrec.delaware.gov/fw/conservation/delmarva-fox-squirrel/DFS%20%20Conservation%20Plan%20Final.pdf.

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

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 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

- Several lots appear to be designed without direct views of open space. Consider redesigning Lots V79-V101, V144-V264, and V294-V299 to allow residents to have direct views of open space. Quality views of the natural environment can enhance resident experiences. Landscape buffers are not equivalent to open spaces.
- Incorporate nonmotorized connectivity and install bicycle racks and covered bike storage where feasible to help facilitate non-vehicular travel modes.
- Use renewable energy infrastructure such as solar or geothermal on community buildings to reduce energy costs and further reduce pollution created from offsite generation. Additionally, 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. 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.

- Include space for recycling dumpsters within the preliminary site design stage. These can be placed adjacent to trash dumpsters.

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

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

Population

- The county has a population density of 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 139, though, with development, this will undoubtedly change. The 12 adjacent blocks aggregated bring the area to a total population of 667.

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 is rated as **relatively moderate** whereas its social vulnerability is rated as **relatively moderate.**

Renewable Energy Commitment

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

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

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

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

<u>Delaware State Housing Authority - Contact Cole Shultz (302) 739-4263</u>

- DSHA supports this master plan proposal as it represents a significant addition to the regions current housing stock, easing up competition for market rate units and by extension competition for naturally occurring affordable housing.

- DSHA also appreciates the diversity of housing types provided by the project, as denser housing forms support more affordable and complete communities when compared with traditional exclusive single-family only developments. This project is in a DSHA-designated Stable area near four existing affordable housing sites, making the addition of market-rate units aligned with existing DSHA guidance.

- DSHA also notes this project does not require a re-zoning, and the site is identified in the Sussex County Comprehensive Plan as an area suitable for this for style of development.

- As mentioned earlier, this project addresses housing affordability by increasing supply to match high demand and enabling residential filtering. According to the 2023 Delaware Housing Needs Assessment, Eastern Sussex was short 881 units affordable to households earning above 120% AMI as of 2021, resulting in those higher income households displacing moderate-income renters from housing options which are affordable to them. This sparks a chain reaction that ultimately hurts renters at the bottom of the income ladder, exacerbating existing shortages. With respect to homeowners, that same report found Sussex County will need to add 5,730 market-rate homeownership units by 2030 to keep up with household growth. Again, this data is based on pre-pandemic trends and given post-COVID growth in Delaware is likely an undercount. The 1,099 units included in this development therefore represent significant progress towards that goal, ultimately freeing up more homes for working Delawareans to purchase. Ultimately, the scale of the current housing crisis necessitates a solution of massive ambition, and this proposal provides precisely that.

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

Fire Department Comments:

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

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

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

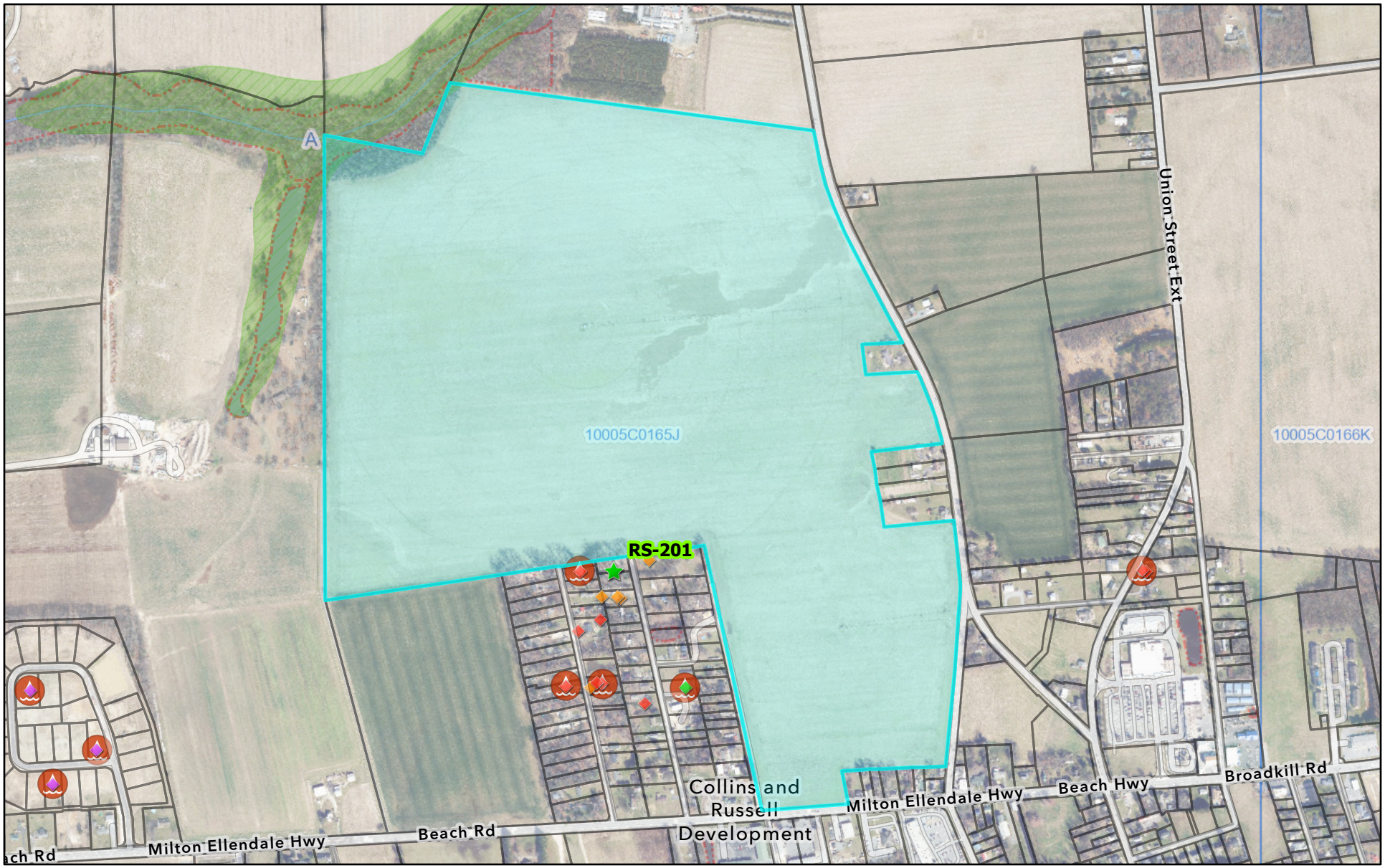
Sincerely,

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

Attachment:

- 2026-09-02 Aerial Drainage Map 235-14.00-4.00
- Sussex County Planning & Zoning Comments
- Sussex County Engineering Department Comments
- Sussex County Community Development & Housing Comments

Delaware Drainage Program Map



9/15/2026, 2:08:37 PM

1:12,241

0 437.5 875 1,750 ft

0 135 270 540 m

Drainage Concerns
- Private Drainage
- Tax Ditch
- Pipe Size Documents
- Roadside Drainage
- Construction, Permitting or Regulation
- Other
- Drainage Concerns - Not Concluded

Tax Ditch Inspection Results
- Drainage Concerns_Site Visit
- Channel Concern
- ROW Obstruction
- Channel & Bank Structures
- Green Infrastructure
- Quick Drainage Photos
- Channel and Bank Structures

- Channel Concern
- ROW Obstruction
- Green Infrastructure
- Other
- Project Locations
- Proposed Channels
- Benefitted Areas

Tax Ditch Channels -
- Drain
- Tax Ditch
- DITCHHOA
- DITCHTAX_NC
- Tax Ditch - Pond Feature

Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community, DNREC

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Sussex County
DELAWARE
sussexcountyde.gov

Preliminary Land Use Service (PLUS) Meeting

September 30, 2026

September PLUS Comments

Sussex County Department of Planning & Zoning

Review and Discussion: Coastal Passage (2026-09-02)
County: Sussex County
Municipality: Unincorporated Sussex County
Location: North of Milton Ellendale Hwy, approximately 552' West of Mulberry Street
Project: HR-1-RPC Residential Planned Community consisting of 1,387 proposed dwelling units featuring a mixture of approximately 1,099 for sale units (attached and detached units) and approximately 288 apartments for rent on a parcel comprised of approximately 228 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 at (302) 855-7878 to schedule a meeting with staff to discuss the proposed project.

Following submission to the County, staff will review the Preliminary Site Plan and provide more detailed comments to the applicant. At the PLUS stage of review, staff comments are limited to high-level observations 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 make as part of any application submitted to the Department.

Tax Parcel ID: 235-14.00-4.00

Proposed: The Plan proposed mixed residential community for both ownership and rental 253 single family units, 1,134 multi-family and townhouse units, with parking, sidewalks, internal roads, and stormwater management on a parcel comprised of approximately 228 acres +/-.

Zoning: The Parcel is currently zoned High Density Residential (HR-1) District. The proposed planned community is permitted in the (HR-1) District. The Plan requires review by the Planning and Zoning Commission.

Density: The Tax Parcel 235-14.00-4.00 consists of 228 acres +/- and the proposed Plan of 1,387 units results in a density of 6.09 units per acre, the maximum allowable density for this parcel is 9.41 units per acre.

Applicability to Comprehensive Plan: The project lies within the Developing Area and that is generally a strong alignment between the existing zoning High Density Residential (HR-1) District. Developing Areas are growth areas where development is anticipated and gives particular attention to infrastructure, road access, density, and compatibility with surrounding development. The proposed residential uses are specifically contemplated in Developing Areas, central water and sewer are available, and the proposed overall density of approximately 6.08 dwelling units per gross acre falls within the Plan's identified 4-12 dwelling unit per acre range for appropriate medium/higher density development in Developing Areas.

Open Space Provisions: The proposed Open Space of 62.963 acres exceeds the required 34.2 acres of Open Space requirement.

Interconnectivity: The Plan shows an opportunity for interconnectivity to an adjacent parcel.

Transportation Improvement District (TID): The Plan is currently in a Planned TID for the Town of Milton. If required, this project will participate in the TID. Staff direct the Applicant to DelDOT in terms of the future activation of a Milton TID.

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

Forested Areas: The Applicant notes that there are 3.107 acres of existing forest on the site and that 3.015 acres of forest will remain.

Wetlands/Waterways: The Application indicates that 0.585 acres are in the Non-Tidal Wetlands and that the wetlands have been delineated.

Site Considerations (Flood Zones, Tax Ditches, Groundwater Recharge Potential etc.): Staff note that no Tax Ditch or ROWs are present on the site. Staff note that approximately 0.585 acres of the site is in Flood Zone "A".

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
September 30, 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: NCC Gender Neutral Language Ord (2026-09-01)**
County: New Castle **Municipality: Unincorporated**
Location:
Project: Review of a proposed Local Government Ordinance to amend New Castle County Code relating to gender neutral language.

III. 9:15 AM **Review and Discussion: Coastal Passage (2026-09-02)**
County: Sussex **Municipality:** Unincorporated
Location: North of Milton-Ellendale Highway, west of Mulberry Street
Project: Review of a proposed site plan for a community consisting of 1,387 dwelling units featuring a mixture of approximately 1,099 sale units and approximately 288 apartments for rent. This project is an area classified as State Strategies Levels 1 through 3.

The proposed project is located within the City/Town/Growth and Annexation Area of the Town of Milton. The Sussex County Engineering Department does not have comments for this project.

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

IV. 9:45 AM **Review and Discussion: Ocean Sands (2026-09-03)**
County: Sussex **Municipality:** Unincorporated
Location: Atlantic Avenue, Clarksville, 19970
Project: Review of a proposed rezoning and site plan for a multi-family residential development with approximately 248 townhouse unts in an area currently zoned AR-1

(Agricultural Residential) requesting to change to MR (medium residential). This project is in an area categorized as State Strategies Levels 2 and 3.

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.

V. 10:15 AM **Review and Discussion: 22803 S. DuPont Hwy Rezoning (2026-09-04)**
County: Kent **Municipality:** Unincorporated
Location: 22803 S. DuPont Highway, Greenwood DE 19950
Project: Review of a proposed rezoning from AR to a commercial zoning, so the land can be used for parking tractor trailers, trucks, cars, etc.

VI. **10:30 AM Review and Discussion: Arslan Commercial Development (2026-09-05)**
County: Kent **Municipality:** Unincorporated
Location: 2271-2275 S. State Street, Dover DE 19901
Project: Review of a proposed rezoning from BG and RS1 to commercial and site plan for the development of retail shopping center with parking. This project is in an area categorized as State Strategies Level 1.

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.

BRANDY BENNETT NAUMAN
DIRECTOR OF COMMUNITY
DEVELOPMENT & HOUSING
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bnauman@sussexcountyde.gov

Sussex County
DELAWARE
sussexcountyde.gov

October 1, 2026

Mr. W. Zachary Crouch
Davis, Browen & Friedel, Inc.
1 Park Ave.
Milford, DE 19963

RE: PLUS Review (PLUS 2026-09-02) – Coastal Passage

Dear Mr. Crouch,

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. This includes the County's Homebuyer Assistance Program,** which provides eligible homebuyers with down payment and closing cost assistance, structured as a deferred 0% interest second mortgage. Developers offering homeownership units are encouraged to make prospective buyers aware of this resource.

Further, Sussex County recently strengthened the Sussex County Rental Program (SCRP) through the adoption of Ordinance No. 4060, offering even greater incentives for developers who choose to participate. The SCRP continues to permit up to 12 units per acre, by right, in eligible areas that set aside 25% of the total units for affordable rentals. SCRP now also allows building heights of up to 60 feet with streamlined, more flexible setback standards for participating projects. Combined with the program's expedited review process, the SCRP

offers developers a meaningful opportunity to increase project density and marketability while helping meet the County's affordable housing goals. For more information on program details and compliance, please visit the Community Development & Housing website at www.sussexcountyde.gov/affordably-priced-rental-units. To learn more about project eligibility and design criteria, please review the Ordinance at https://sussexcountyde.gov/sites/default/files/ordinances/o4060.pdf. The application for SCRP 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