DELAWARE STATE STRATEGIES

Smart Growth:
Efficient Spending.
Affordable Housing.
Climate Resiliency.
Land Conservation.
Economic Development.

Responses to Public Comments

The 2025 Strategies for State Policies and Spending (State Strategies) was released by the Cabinet Committee on State Planning Issues (CCSPI) for public review on September 10, 2025. During a 30-day comment period, which concluded on October 10, 2025, the Office of State Planning Coordination (OSPC) hosted 3 public workshops and received more than 80 comments.

On behalf of the CCSPI, OSPC has prepared this document to categorize, summarize, and respond to all comments received on the draft State Strategies document and maps. Each comment is categorized into 1 or more of 6 categories and specifies whether an action was taken. The CCSPI hopes this document provides additional insight into the State Strategies development process.

OSPC

Date(s)	8/7/2025, 9/2/2025, 9/22/2025
Submitted by	Ken Adams
Affiliation	Melvin L. Joseph Construction Co.
Comment	Good afternoon. Our family owns several large Tracts of land on the Rt113 corridor between Georgetown and Millsboro. I would like to discuss the process of the updating of the map and our parcels to hopefully ensure that they are placed in the correct Level based on their individual situations. If not yourself, could you put me in touch with whomever we could speak to. At the risk of becoming a pain, I took the time to gather some information concerning our area along 113. It'll be obvious my lack of technical skills but I think it tells the story of the existing nature of the area. I'm uncertain of the conditions that would warrant changes in investment levels but, I would note the proximity to the current and new Sussex Central High schools along with the Howard T Ennis school just across the field from these 113 parcels. Those along with the new Police Troop #4, existing Stockley Ctr property and large number of commercial businesses and zoning and CUs lining the corridor are indicators of the area being developed already. Some of the businesses have been concentrated in the Governor Stockley section for 85 years! In addition to the ever expanding CPCN area that Artesian is developing along this main arterial road, they all seem to be huge contributing factors. The actual smattering of existing investment levels 2 & 3 along the corridor seem to indicate the appropriateness of these levels throughout this stretch. Thanks for your patience and willingness to listen to my thoughts. Submitted the following comments about Rt 113 parcels: 1.They are situated in the Town of Millsboro's future annexation zone, listed as future Highway Commercial. 2. They are situated in the County's future growth zone as expressed by them, as they work to update their map. 3. They are not in a recharge area. 4. They are served by Artesian for both water and sewer, as found in the letter from Artesian previously forwarded. 5. Are situated directly on Rt 113 in an area where Deldot recently awarded a TIIF grant for improvements to an adjacent parcel that is designated a Level 2 property.(Tidal Health) Are adjacent to East Piney Grove Rd, the site of a forthcoming Grade Separated Interchange. 6. Are situated directly across Rt 113 from parcels, 133-11.00-6.00, 133-11.00-7.00, 133-11.00-5.00, that are in Level 2 and are similarly situated, possessing all of the same qualities as do our parcels. 7.They are contiguous to the Tidal Health medical property, currently under construction.(Proximity to medical facilities) 8. Are situated within 2 miles of all of Millsboro's services(fire, police, library, DART)
Response	The process for creating the Strategies for State Policies and Spending investment level designations is a data-driven process. Please refer to our data Story Map link (https://storymaps.arcgis.com/stories/0dade3116eb04ced807086a9260d1262) and the "Collaborative Update Process" in the policy document (https://stateplanning.delaware.gov/strategies/documents/2025-state-strategies-draft.pdf) to learn more. Click on the interactive strategies map explorer (https://experience.arcgis.com/experience/c32893afd06a44b883c6e341a71fc23c) to learn more about the data layers that influence the investment level designation of the property you referenced. Based on new information that these parcels are within an Artesian CPCN and are within the Millsboro growth area. The current map shows these parcels as Level 3 and 4.
Action	N/A
Category	
	Individual Parcel Request
Comment ID	1

Date(s)	8/8/2025
Submitted by	Todd Lawson
Affiliation	Sussex County
Comment	1) In July, the County raised the issue of the hospitals included in OSPC's story map. A snip of the story map is inserted below. Specifically, the question was asked why three hospitals built in Sussex were not included. The hospitals are located on Hudson Road in Milton, Roxana Road in Millville, and John J. Williams highway in Rehoboth. Additionally, Tidal Health just broke ground for their new medical campus in Millsboro. The County seeks a better understanding of the methodology used for the inclusion and/or exclusion of these medical facilities. 2) It appears from the story map that most of the Sussex County EMS stations are included in the diagram. Snip inserted below. However, the County is building a new station within the Dewey Beach Town Hall, is that reflected in the story map? Additionally, the County has purchased land for new stations in Ellendale and Milton that will relocate the current stations near those municipalities. Is this reflected in the Map? Finally, the County has plans to build a new station in the Williamsville area in the near future. That information should be factored into the new Map as well. 3) In the State's new layers, it looks like the Delaware Ecological Network Layer is out of date in quite a few places. Looking at the Peninsula MR-RPC and Peninsula Lakes, which have been implemented now for several years, OSPC's layer is still showing these as being part of the Ecological Network based on the forest that previously existed on those development sites. Snip inserted below. The County would like confirmation as to what data is being used in this layer. 4) There is an overarching concern that areas that are being discouraged from growth are double-, triple- and quadruple- weighted negatively based upon multiple and overlapping similar factors, which tends to arbitrarily limit future planning and the appropriate expansion of Levels 1, 2 or 3. Conversely, there is less double- or triple- positive weighting in favor of future growth and the expansion of Levels 1, 2 or 3. In the cases where there is a double- or triple- positive weight given, this appears to be primarily in areas that are already Levels 1 or 2. As a result, the mapping exercise appears to be biased in favor of the status quo without appropriately planning for the future. 5) While the data includes a "+1" designation for Transportation Improvement Districts ("TID"), only the Henlopen and Milford TIDs are positively factored. It appears the mapping exercise does not include the Milton or the Roxanna TID that are currently underway. The failure to positively factor these in the mapping exercise will likely result in significant inconsistencies between the new State Strategies Mapping and the detailed planning and funding of the TIDs by DelDOT. 6) It appears there is no positive weight given for areas in proximity to DelDOT CTP projects, or proximity to major roadways, etc. 7) OSPC utilizes data for existing sewer and water infrastructure. But how does OSPC take into account plans for sewer and water expansions that will occur in the next five years? There are pending land use applications in Sussex that will result in more sewer and water lines being installed using public and private funding sources in areas not reflected in the current data. 8) Sussex County's existing Growth Areas are awarded a "+1" in the new State Strategies mapping exercise. Conversely, areas outside of Sussex County's existing Growth Areas are given a "-1" designation. However, these Growth Areas are now approximately 8 years old, and development and the corresponding infrastructure has followed in those Areas. By using existing (8-year-old) Area designations as a tool, the State Strategies mapping exercise is not forward-looking and does not take into consideration the likely expansion of the County's Growth Areas in 2028. This use of old data does not take into account any future planning needs. 9) The Delaware State Housing Authority's Areas of Opportunity do not appear to be factored into the mapping exercise. An "Area of Opportunity" is designated by the Delaware State Housing Authority as a strong, high valued market, with close job proximity and economic opportunity, high performing schools, amenities, and supportive infrastructure that help households succeed. As Sussex County has recently experienced, the Delaware State Housing Authority has supported projects that are in an "Area of Opportunity" that are not reflected as such by existing State Strategies Mapping. This disconnect should not be perpetuated in the current mapping exercise by failing to account for the "Areas of Opportunity" with positive weighting.

Response	1) The methodology used to quantify Hospitals leveraged DHSS publications for licensed facilities, excluding those that were for psychiatric and rehabilitation services. Since the email in July from Sussex County our staff have done extended outreach to confirm these documents and our analysis with DHSS and have determined that two of the three facilities would be included in the data for strategies (Excluding only the location in Rehoboth). Subsequently DHSS will be updating their publications. 2) Currently only facilities that are built are included in the analysis, while it is appreciated that the county is working to build new facilities these projected facilities do not promote growth in the way that a built facility does, moreover planned growth and infrastructure may never come to fruition thus potentially impacting the analysis in an negative manner should we use these elements. 3) The Delaware Ecological Network. https://de-firstmap-delaware.hub.arcgis.com/datasets/6b97ca9bc33c41f391c7c3a007c15fb2_0/explore?location=38.919032%2C-75.335432%2C10.50. In response to this comment OSPC has run a light analysis to remove areas appearing in 2022 Land Use Land Cover that depict "Built Lands' from the DEN and implemented into the Storymap and subsequent Investment Map. 4) While it is true that there are areas of overlap in the data for areas promoting preservation it is not true that areas of overlap do not exist to re-enforce growth data. many times, hospitals, EMS facilities and fire stations overlap one another in addition to adding elements that would also seek to enforce the growth zones that local jurisdictions have outlined in their thorough efforts to generate and update their comp plans. In addition to this it is important to note that our state is a coastal and farming state which lends itself to our environmental resources overlapping in many cases and draws a heightened need to include and consider these factors in our analysis. 5) Active TID's were included as part of guidance from our agency partners in DelDOT. 6) There are no area of impact datasets available to be included in the analysis for these highway infrastructure investments. 7) Private water and wastewater infrastructure outside of growth areas, as identified in local government comprehensive plans, is not included in the analysis. Private wastewater service outside of growth zones encourages and enables rural sprawl, which is contrary to the purpose of the State Strategies to promote compact, mixed use development in areas identified for growth by local governments. At the request of Sussex County, the OSPC has engaged with Artesian Water Company Incorporated. Artesian has discussed and described their wastewater transmission and treatment infrastructure in Sussex County. Collaborative discussions are continuing but at this point, no data has been shared due to concerns about security and proprietary business information. With that said, this wastewater transmission and treatment system is critical to future growth and development of Sussex County and needs to be carefully considered as Sussex County updates its comprehensive plan. 8) Growth planning in part by the county and other local governments is expected to be thorough and forward looking, the analysis has long utilized growth data and the negative area not included in this valuable data element to reenforce county plans and future goals. This helps the state ensure it is in line with the goals of the county during its implementation of state strategies and investments from its various agencies and divisions. If a local government feels that their comprehensive plan no longer reflects their priorities, they are welcome to update their plan according to the process specified in Delaware Code. 9) DSHA publishes a GIS map of "Areas of Opportunity." Their mapping methodology includes data on school districts. 2023 DSHA QAP. OSPC has included areas of opportunity in its analysis for state strategies.
Action	Included 2 of 3 facilities noted in comment. OSPC has run a light analysis to remove areas appearing in 2022 Land Use Land Cover that depict "Built Lands' from the DEN and implemented into the Storymap and subsequent Investment Map. OSPC has included areas of opportunity in its analysis for state strategies.
Category	Environment/Sustainability/Resiliency
	Sussex County Government Comments
	Data Change Requests
	Private Sewer
	Other
Comment ID	2

Date(s)	8/29/2025, 10/10/2025
Submitted by	Jamie Whitehouse
Affiliation	Department of Planning and Zoning - Sussex County
Comment	1) Re: 2025 State Spending Strategies Update – Comments on Published Draft Thank you for the opportunity to comment on the proposed 2025 update to the State Spending Strategies Investment Level Map ("the Map"). Please could I thank your team for having increased the radius around public libraries from 1 mile to 3 miles and for including the 24-hour Bayhealth Emergency Room located at 18383 Hudson Rd Milton, DE, 19968, in the Hospitals data layer. Having reviewed the published Strategies data layers, Sussex County has the following comments: 2) The map utilizes data for existing sewer and water infrastructure. The map, however, does not take into account plans for sewer and water expansions that will occur in the next five years. There are pending land use applications in Sussex that will result in more sewer and water lines being installed using public and private funding sources in areas not reflected in the current data. The substantial investment in this infrastructure should be factored into the map. 3) TidalHealth is currently building a new 150,000 square foot medical campus in Millsboro located north of Millsboro off of Route 113 and Route 20. This medical campus is scheduled to open in 2026 and should be factored into the map. 4) The area between the Towns of Georgetown and Millsboro along the Route 113 corridor should be reviewed and reconsidered given the planned levels of spending, mainly in road improvements, scheduled in the upcoming years. 5) As discussed in our meeting on August 11, 2025, there appears to be unnecessary duplication within the preservation layers that results in potential double and triple counting of the same environmental features. The County believes that the Delaware Ecological Network layer (the "DEN") is largely based on a fusion of the environmental features that are already protected in the non-tidal wetlands data layer and the Agricultural and Forest Lands of Importance data layer. As the County's trees and non-tidal waters are already accounted for negatively in their own data layers, the fusion of those features to create an additional third data layer in the DEN layer artificially reduces the score of lands that are located within the DEN layer. The similarity is illustrated in Appendix A. To resolve this duplication, the County respectively requests that the DEN layer be edited using GIS software to only include those lands that do not intersect with lands already protected in the non-tidal wetlands data layer and the Agricultural and Forest Lands of Importance data layer.
Response	1) In response to this feedback, OSPC has worked with the fire commission on updated data and methodology. This data has been included in the analysis. 2) Please note that private water and wastewater infrastructure outside of growth areas, as identified in local government comprehensive plans, is not included in the analysis. Private wastewater service outside of growth zones encourages and enables rural sprawl, which is contrary to the purpose of the State Strategies to promote compact, mixed use development in areas identified for growth by local governments. At the request of Sussex County, the OSPC has engaged with Artesian Water Company Incorporated. Artesian has discussed and described their wastewater transmission and treatment infrastructure in Sussex County. Collaborative discussions are continuing but at this point, no data has been shared due to concerns about security and proprietary business information. With that said, this wastewater transmission and treatment system is critical to future growth and development of Sussex County and needs to be carefully considered as Sussex County updates its comprehensive plan. 3) After further review, the TidalHealth campus will not be part of the strategies analysis based on the fact that it is not a full service hospital with an emergency center, but a medical office pavilion. 4) In response to the Route 113 corridor, please be aware that the State has identified a number of corridor areas in need of further study, including Route 113. See the policy document for more information. 5) Regarding the DEN Layer, the resource agencies consider this to be a critical GIS dataset that identifies ecological connectivity and a wide variety of natural resources. It remains in the data analysis. OSPC has run further analysis to ensure the data more accurately reflects current land use conditions. The analysis removed areas appearing in 2022 Land Use Land Cover that depict "Built Lands" from the DEN. The final strategies maps will utilize this new layer.
Action	In response to this feedback, OSPC has worked with the fire commission on updated data and methodology. This data has been included in the analysis.
Category	Environment/Sustainability/Resiliency
	Sussex County Government Comments Data Change Requests
	Private Sewer
Comment ID	3

Date(s)	9/2/2025
Submitted by	Charles Carey
Affiliation	Land owner in Sussex County
Comment	Requesting parcels 235-19.00-37.00 and 235-19.00-20.00 located at Route 30 and Sand Hill Road be moved out of Level 4.
Response	The process for creating the Strategies for State Policies and Spending investment level designations is a data-driven process. Please refer to our data Story Map link (https://storymaps.arcgis.com/stories/0dade3116eb04ced807086a9260d1262) and the "Collaborative Update
Action	N/A
Category	
	Individual Parcel Requests
Comment ID	4

Date(s)	9/2/2025
Submitted by	Joe Reed
Affiliation	Seaside at Lewes, LLC
Comment	Would like to submit that the highway frontage (30 +/- acres) of the Seaside at Lewes lands on Coastal Highway at the planned SR1/Cave Neck GSI should be designated as Level 2 or 3.
Response	The process for creating the Strategies for State Policies and Spending investment level designations is a data-driven process. Please refer to our data Story Map link (https://storymaps.arcgis.com/stories/0dade3116eb04ced807086a9260d1262) and the "Collaborative Update Process" in the policy document (https://stateplanning.delaware.gov/strategies/documents/2025-state-strategies-draft.pdf) to learn more. Click on the interactive strategies map explorer (https://experience.arcgis.com/experience/c32893afd06a44b883c6e341a71fc23c) to learn more about the data layers that influence the investment level designation of the property you referenced. These parcels are not currently identified within a growth area of a local jurisdiction per their certified comprehensive plan.
Action	N/A
Category	
	Individual Parcel Requests
Comment ID	5

Date(s)	9/11/2025
Submitted by	Mike Bailey
Affiliation	City of Seaford
Comment	The City of Seaford would like to have the following parcels amended of the Draft Strategies Investment Map: Change from “Out of Play” to “Level 1” SCTM# 331-5.00-4.32 SCTM# 331-5.00-4.31 SCTM# 331-5.00-4.30 SCTM# 331-5.00-4.29 SCTM# 331-5.00-4.27 SCTM# 331-5.00-4.25 SCTM# 331-5.00-4.24 SCTM# 331-5.00-4.11 SCTM# 331-5.00-4.10 SCTM# 331-5.00-4.07 SCTM# 331-5.00-4.04 SCTM# 331-5.00-4.00 SCTM# 331-5.00-4.28 Change entire parcel to “Level 1” SCTM# 531-10.00-207.00 SCTM# 531-10.00-207.01 SCTM# 531-10.00-208.00
Response	Parcels requested to be changed from Out of Play to Level 1 will be removed from Out Of Play and submitted into the general analysis for scoring and Investment Level assignment The process for creating the Strategies for State Policies and Spending investment level designations is a data-driven process. Please refer to our data Story Map link (https://storymaps.arcgis.com/stories/0dade3116eb04ced807086a9260d1262) and the "Collaborative Update Process" in the policy document (https://stateplanning.delaware.gov/strategies/documents/2025-state-strategies-draft.pdf) to learn more. Click on the interactive strategies map explorer (https://experience.arcgis.com/experience/c32893afd06a44b883c6e341a71fc23c) to learn more about the data layers that influence the investment level designation of the property you referenced.
Action	Worked with DNREC to update data for relevant changes.
Category	
	Individual Parcel Requests
Comment ID	6

Date(s)	9/12/2025
Submitted by	Malcolm Jacob
Affiliation	Dover/Kent County MPO
Comment	Great job! I really like the graphics you use to explain the policy framework and the different criteria used in the analysis. The spreadsheet depicting policy actions for each state office is also very helpful. More people should know about the StoryMap, that will be another useful tool for explaining the process to a wider audience. Regarding the 100-year floodplain criteria, do you explain anywhere why it is used for preservation in Sussex County rather than total exclusion? I think that's important, seeing as it's one of the few cases where the criteria is different for each county. This is a question people with an environmental background might have, seeing as Sussex is highly vulnerable to sea level rise and really should be treated with the same scrutiny. This was clearly a lot of work with multiple different forms of media for conveying the info. I look forward to seeing the final outcome of the document!
Response	There are two key items on the story map for Flood plains 1. 100 Year Flood plains in New Castle and Kent county - These can be found in the Out Of Play section of the story map. 2. 100 Year Flood Plains in Sussex County - These can be found in the Preservation section of the story map. Sussex County floodplains are not legally restricted from development, as they are in the other two counties. We will clarify this in the story map.
Action	Update story Map items
Category	Environment/Sustainability/Resiliency
	Data Change Requests
Comment ID	7

Date(s)	9/30/2025
Submitted by	Danielle Swallow
Affiliation	University of Delaware
Comment	Talking Points for 2025 State Strategies for Spending The draft of the 2025 State Strategies for Spending reflects a lot of thought and consideration to balancing development with conservation, infrastructure planning, and quality of life measures. On the whole, it makes sense from a traditional planning standpoint to guide growth and density to areas that already have infrastructure in place. Traditional concepts of Smart Growth developed in the 1990s – well before many communities started experiencing the impacts of climate change. Today, a Smart Growth approach should include resilience to climate change. Page 9 and 10 of the draft report implies that Climate Resilience is a factor in the state's Smart Growth strategy but the state presents a very narrow understanding of Climate Resilience. It describes it mainly in the context of energy efficiency and reducing greenhouse gas emissions (even multi-modal transportation options achieve those goals). But Climate Resilience also depends on society learning to adapt to and rebound from the inevitable impacts that historical rates of emissions have caused. Nationally, we are experiencing a higher frequency of extreme events and a greater number of billion-dollar disasters. In 2024, the Nation experienced 27 billion-dollar events compared to the average of 9 annual billion-dollar events from 1980-2024 (CPI adjusted – source: NOAA/NCEI). Whereas the rise in the frequency of extreme events is believed to be caused by climate change, the increase in the cost of these disasters is attributed to population growth in hazard-prone areas by socially-vulnerable groups. In addition, local building codes are generally falling behind what is needed to mitigate damage from today's extreme events. In Sussex County, Delaware, we have similar ingredients for disaster. We have a surge in population growth at the coast – an area with the lowest elevation that is especially vulnerable to flooding from storms and sea level rise. Older adults make up the majority of the growth at the coast. According to FEMA's Guide to Expanding Mitigation (2022) older adults are a vulnerable population who "represent the greatest share of deaths from extreme weather events and other natural disasters." In addition, we have land use practices and building codes which allow development inside the floodplain and which do not properly conserve the natural resources in our floodplain – reducing its ability to absorb excess flooding and waves. Finally, our State Climatologist says we are seeing evidence of more extreme weather in Delaware. It is simply unrealistic to think that we won't be spared a highly consequential disaster. Unfortunately, the draft State Strategies plan does little to mitigate this. According to the draft map of investment levels, many municipal and unincorporated areas of coastal Sussex County are targeted for further development as Level 1 and Level 2 areas. It is true that these areas already experience development pressure and have some of the infrastructure needed for growth, but a Smart Growth strategy should not encourage additional people and infrastructure to be concentrated in areas with the highest vulnerability and exposure to storms and sea level rise in the state. This county already experiences flooding on critical evacuation routes at high tide. It is not a Climate Resilient strategy to focus more development inside the coastal floodplain and adjacent areas. We need more investments in open space, wetland restoration, stormwater mitigation, and elevating roads at the coast. Smart Growth needs to balance these considerations because the current strategy puts more people at risk. Additional comments: 1. Goals section – page 8: Climate Resilience is not listed as a goal. 2. Out of Play section, page 21 – should the 100-year floodplain in Sussex County be included? It's understandable that Kent and New Castle County are listed since their land use policies discourage development in the 100-year floodplain, and Sussex County does not. It is also true that some municipalities in Sussex have a considerable percentage of their land in the 100-year floodplain. But in terms of redevelopment – or especially infill- a smart resilience strategy would be to take back as much as the floodplain as possible and convert it to open space and green infrastructure like wetlands and forests. 3. The GIS data analysis used for the State Strategies is using an out-of-date flood risk map, called the Flood Risk Adaptation Map (FRAM). (page 15 – Resiliency Box). This map utilizes LiDAR data (elevation) that is from 2005 and 2007, so depictions of flood risk may not be accurate due to land subsidence and other changes over time. LiDAR

	data from 2014 is available. Also the state can consult the Sea Level Rise Viewer from NOAA which presents a coastal inundation map based on up to date sea level rise scenarios for Delaware (choose the Local Scenarios option). 4. The draft Strategies is not properly aligned with the State's new Climate Action Plan which calls for protecting and preserving existing wetlands (Strategy O.1) including expanded marsh restoration (Strategy O1.3) and facilitating marsh migration in comprehensive development plans (Strategy O.2.3). The Climate Action Plan also calls for preserving land to allow for marsh migration and connectivity (Strategy P2.2) and incorporating climate change into agriculture and natural areas management (Strategy P3.2) and investing in nature-based solutions and infrastructure improvements that support resilience to multiple hazards (Strategy R2).
Response	Many of the points are addressed through the agency's policies in the implementation of the strategies chapter. 1. While climate resiliency is not one of the original 11 goals, we have added climate resiliency as a main component of our policy framework and have coordinated this edition of the state strategies with DNREC's climate action plan so that the two documents are complementary. 2.There are two key items on the story map for Flood plains 1. 100 Year Flood plains in New Castle and Kent county - These can be found in the Out Of Play section of the story map. 2. 100 Year Flood Plains in Sussex County - These can be found in the Preservation section of the story map. Sussex County floodplains are not legally restricted from development, as they are in the other two counties. 3. The FRAM data analysis reflects the most up to date data received from our partners at DNREC. 4. The climate action plan is currently underway to being revamped and completed, considering the tandem nature of these efforts we are unable to use draft elements of a plan that is not complete and implemented. We have worked closely with agency partners from DNREC to ensure we are taking into account data in support of their goals. In response to these concerns, we are making the environmental data more visible by creating an ancillary map to be included with the state strategies document map series.
Action	N/A
Category	Environment/Sustainability/Resiliency
Comment ID	8

Date(s)	9/30/2025
Submitted by	Bruce Wyngaard
Affiliation	
Comment	The thrust of my comments for the draft 2025 plan were about the proximity of single sources of pollution and their location adjacent to residential communities. I have attached a map that shows old, new and still under construction residential communities surround single sources of pollution - planned distribution centers. A one mile radius is drawn for each distribution center. In this case, just two of the distribution centers are expected to generate 10,000 trucks and cars a day. Obviously that is a lot of diesel emissions. The science around the public health affects of diesel emissions from distribution centers is documented in many places but the idea for this map comes from the publication I handed you at the workshop. (Making the Invisible Visible. Shining a Light on Warehouse Truck Pollution. Environment Defense Fund. April 2023.
Response	The Strategies data analysis is comprised of data layers that relate to land use and infrastructure decisions. Your comments seem to be specifically related to air quality impacts of certain local government land use decisions. Air quality and freight management is studied by DelDOT, DNREC, and WILMAPCO. These matters are not a part of the state strategies analysis.
Action	N/A
Category	Environment/Sustainability/Resiliency
Comment ID	9

Date(s)	10/1/2025
Submitted by	Mark Trostle
Affiliation	CMFA
Comment	It is not clear why some properties with CPCNs for sewer and water are shown with a Growth Factor "credit" but others are not.
Response	Private water and wastewater infrastructure outside of growth areas, as identified in local government comprehensive plans, is not included in the analysis. Private wastewater service outside of growth zones encourages and enables rural sprawl, which is contrary to the purpose of the State Strategies to promote compact, mixed use development in areas identified for growth by local governments. At the request of Sussex County, the OSPC has engaged with Artesian Water Company Incorporated. Artesian has discussed and described their wastewater transmission and treatment infrastructure in Sussex County. Collaborative discussions are continuing but at this point, no data has been shared due to concerns about security and proprietary business information. With that said, this wastewater transmission and treatment system is critical to future growth and development of Sussex County and needs to be carefully considered as Sussex County updates its comprehensive plan.
Action	N/A
Category	
	Private Sewer
Comment ID	10

Date(s)	10/1/2025
Submitted by	Kevin Gilmore
Affiliation	Sussex County Habitat for Humanity
Comment	I attended the information session in Georgetown on 9/30/25. The process for developing the maps was impressive and explained very well. That said, it appears that the process is flawed. The contributing characteristics to developing strategies for the future are based in the past. They don't seem to be predictive at all where goals for future strategies and priorities would be factored into the maps. It appears that there is very little change to the level one and level two investment areas. In Sussex County, most of the level one and two areas are already built out and likely growth areas along major travel corridors like routes 9, 113 and 1 still have a lot of area destinated as Level 4. Additionally, with Affordable Housing as a stated strategy, the Level 1 & 2 areas have the highest cost land. More Affordable Housing would likely be created if additional land was identified as Levels 1 & 2.
Response	As a compliment to the State Strategies Investment map a Residential capacity analysis is done based on lands identified as not currently built. This analysis is done with long range projections in mind, the results of this analysis indicate that there is adequate land available in levels 1,2 and 3 to accommodate growth projections. Insert Link
Action	N/A
Category	
	Data Change Requests
	Other
Comment ID	11

Date(s)	10/1/2025
Submitted by	Brent Reed
Affiliation	Reed Ventures
Comment	Tax Map ID: 235-23.00-1.00 & 235-23.00-1.05 1) These parcels are served by public water (Tidewater) and sewer (Artesian) 2) This site is home to a $50m+ grade separated interchange being installed by DelDOT over the next couple of years. 3) The rear 200+/- acres of this property just recently obtained preliminary approval from Sussex County for a 359-unit residential project. 4) I understand there is a local and statewide push to create "self-sufficient" communities where residents have access to neighborhood commercial amenities such as grocery stores, convenience stores, etc. 5) A level 2 or 3 investment area would appropriately reflect this need. 6) Affordable housing is not permitted in Level 4 investment areas. We had to table our preliminary plans for 100+ affordable housing units due to these properties being outside of level 2 or 3 investment areas. 7) This property was designated as part of the Developing Area in the FLUM until it was arbitrarily removed at the last hour in the 2018 map.
Response	The process for creating the Strategies for State Policies and Spending investment level designations is a data-driven process. Please refer to our data Story Map link (https://storymaps.arcgis.com/stories/0dade3116eb04ced807086a9260d1262) and the "Collaborative Update Process" in the policy document (https://stateplanning.delaware.gov/strategies/documents/2025-state-strategies-draft.pdf) to learn more. Click on the interactive strategies map explorer (https://experience.arcgis.com/experience/c32893afd06a44b883c6e341a71fc23c) to learn more about the data layers that influence the investment level designation of the property you referenced. These parcels are not currently identified within a growth area of a local jurisdiction per their certified comprehensive plan.
Action	N/A
Category	
	Individual Parcel Requests
Comment ID	12

Date(s)	10/2/2025
Submitted by	Dan Gorman
Affiliation	
Comment	I attended the workshop for New Castle Cty. There was much discussion and emphasis about promoting growth, facilitating transportation, preserving farmland, etc. There were also many points on Preservation. I was concerned that there did not appear to be notes or inputs about the air and noise pollution associated with creating these dense, high-traffic corridors that run through residential communities. A specific example is the planned development of a 3 million square foot distribution center, on Jamison Corner Rd, in the heart of surrounding schools and homes. The resulting traffic expected on Boyd's Corner Rd will require adding 2 additional lanes. This road runs right through the middle of existing homes and new homes under construction. My home, along with many others is only 300 feet from the road (others are less). Already, on busy days, I smell diesel exhaust exhaust at my home. I believe if you plan for major traffic, you need to also find a way to route it away from homes.
Response	State strategies is an overarching planning effort there are planning efforts geared towards freight management being carried out by the Metropolitan Planning Organizations (WILMAPCO).
Action	N/A
Category	Environment/Sustainability/Resiliency
Comment ID	13

Date(s)	10/2/2025
Submitted by	Jim Fuqua
Affiliation	Fuqua, Willard, & Schab, P.A. (Representing Carl M. Freeman Companies)
Comment	1. The draft map running west on Route 9 from Five Points decreases from Level 1, 2 and 3 to the east boundary of the CMS properties, which are designated Level 4, and then returns to Level 3 and 2 from the west CSC properties boundary to Route 5. Adjacent lands to the North of the CSC properties are designated Level 2 and 3. Why are the CSC prope1ties singled out and treated as a Level 4 "gap" between Level 2 and 3 properties to the east, west and north? 2. The OSPC Review Letter on PLUS Review 2023-01-04 dated February 22, 2023 indicated in comments from the Delaware State Housing Authority (Page 27) that the CSC prope1ties were located in a DSHAdefined "Area of Opportunity". Why was this not considered as a growth factor? 3. Tax Map Parcel 235-27.00-11.01 (Bay Health Medical Center), which is located adjacent to the CSC prope1ties on the East side of Hudson Road, was credited with a growth factor for being in a "350 contiguous acre built area". The CSC prope1ties which are also on the East side of Hudson Road are across from the same prope1ties as the Bay Health property. Why were the CSC prope1ties not treated the same way and given a growth factor for being in a "350 contiguous acre built area"? 4. The Sussex County Comprehensive Plan (Pages 7-4) indicates that the CSC properties are within a CPCN water service area issued to Artesian. Why were the CSC prope1ties not credited with a growth factor for being in a water CPCN area? 5. The Sussex County Comprehensive Plan (Pages 7-15) indicates that the CSC properties are within a CPCN wastewater service area issued to Artesian. Why were the CSC properties not credited with a growth factor for being in a wastewater CPNC area? 6. The data sets use the growth/rural areas designated of the 2018 Sussex County Comprehensive Plan's Future Land Use Map as a factor to determine growth or preservation for the draft map. The County's Future Land Use Map was created in 2017 and is now eight years old. As the OSPC knows, significant growth has occurred in Sussex County over that time period. Using older, outdated information for a forward looking, future investment map is not appropriate or realistic planning. 7. The CSC properties were given a "preservation" value as "Agricultural and Forest lands of importance". As the OSPC is aware, the prope1ties have been purchased for development either as a residential planned community or cluster subdivisions, which is an existing "permitted use" under the Sussex County Zoning Ordinance. Additionally, as part of any future development, the most environmentally sensitive portion of the properties, including approximately sixty acres of mature woodlands, will be preserved and protected by a conservation easement. Why were the CSC prope1ties given a "preservation" value that disregards the facts as to the future development of the properties? 8. Is the draft map totally based on the growth/preservation data sets or are other factors considered? The data sets create a good starting point for the draft map but not a realistic finishing line, other relevant information should also be considered.
Response	The process for creating the Strategies for State Policies and Spending investment level designations is a data-driven process. Please refer to our data Story Map link (https://storymaps.arcgis.com/stories/0dade3116eb04ced807086a9260d1262) and the "Collaborative Update Process" in the policy document (https://stateplanning.delaware.gov/strategies/documents/2025-state-strategies-draft.pdf) to learn more. Click on the interactive strategies map explorer (https://experience.arcgis.com/experience/c32893afd06a44b883c6e341a71fc23c) to learn more about the data layers that influence the investment level designation of the property you referenced. We note that the plan amendment that was reviewed as PLUS 2021-12-12 is still pending a decision before Sussex County. Should this amendment be approved by Sussex County and Cabinet Committee on State Planning Issues, we will consider this consistent with the Strategies for State Policies and Spending.
Action	N/A
Category	
	Individual Parcel Requests
Comment ID	14

Date(s)	10/6/2025
Submitted by	Wayne Baker
Affiliation	83 year old county resident , lived in the county for 83 years.
Comment	I and my family own a lot of land in the Hollyville area , Hollyville RD ,Avalon Rd, Lawson RD and Johnson Rd. Approx. 1100 acres. Across the roads from my farm are thousands of lots in various stages of development, with water and sewer provided by Artesian and natural gas provided by Chesapeake Utility. At the very least my property should be in Level 3.
Response	The process for creating the Strategies for State Policies and Spending investment level designations is a data-driven process. Please refer to our data Story Map link (https://storymaps.arcgis.com/stories/0dade3116eb04ced807086a9260d1262) and the "Collaborative Update Process" in the policy document (https://stateplanning.delaware.gov/strategies/documents/2025-state-strategies-draft.pdf) to learn more. Click on the interactive strategies map explorer (https://experience.arcgis.com/experience/c32893afd06a44b883c6e341a71fc23c) to learn more about the data layers that influence the investment level designation of the property you referenced. These parcels are not currently identified within a growth area of a local jurisdiction per their certified comprehensive plan.
Action	N/A
Category	
	Individual Parcel Requests
Comment ID	15

Date(s)	10/6/2025
Submitted by	Fern G
Affiliation	Property Owner
Comment	Protect our open space and wildlife corridors by refusing to make any investments in level 4. Expand mass transit. Expand bicycle access and safety with protected and connected trails. Decisions must be made with data and community experience. We need to know environment, planning and transportation standards and best practices. We need to know when development is “enough” based on specific criteria. For ex, what vehicle load can a road of a certain distance/size support to expect vehicles traversing at a certain speed? What population density can a parcel of land support based on existing infrastructure (water, power, schools, health care, emergency services)? What is a desired response rate for police/fire/ambulance on a certain type/size of road, regardless of population density? How much flood plain protection and resilience is required? How much wildlife corridor and wetlands must be protected? We need this info to make planning decisions. E-bikes are dangerous on trails, btw Additional Comment Submitted 10/10: Looking at the map, I cannot tell the investment level designations by lot. As a car-free resident, I get around almost completely by bicycle. I do not support further investment outside the Coastal area on Route 9, especially in the vicinity of Cool Spring. There are many places in all 3 counties where further investment is appropriate. This area is NOT one of them. Protect this area from further investment. We need to keep pervious coverage, wildlife corridors, and trees (for clean water, clean air, sound barriers, public health and safety, and more). The environment is fragile. We are all in this together. Help us protect this area for current residents, businesses and visitors, as well as for future generations, by protecting its ecology and quality of life. The current environment is already overburdened and cannot manage the current demand. Keep the investment level designation of land outside the coastal area on Route 9 as level 4. My life may depend on
Response	Thank you for your various specific comments. The state agency cabinet secretaries and staff will see your comments throughout the implementation of the State Strategies.
Action	N/A
Category	
	Other
Comment ID	16

Date(s)	10/6/2025
Submitted by	David Carey
Affiliation	
Comment	Following up on our conversation at the Sussex County 2025 OSP Strategies for State Spending Workshop last Tuesday, I am resubmitting a letter to have tax parcel 235 19.00 20.00 removed from level 4. I appreciate your willingness to review the data and look forward to hearing from you. Please take a few minutes to review and contact me at 207-650-8881 © if you have any questions or need additional information.
Response	The process for creating the Strategies for State Policies and Spending investment level designations is a data-driven process. Please refer to our data Story Map link (https://storymaps.arcgis.com/stories/0dade3116eb04ced807086a9260d1262) and the "Collaborative Update Process" in the policy document (https://stateplanning.delaware.gov/strategies/documents/2025-state-strategies-draft.pdf) to learn more. Click on the interactive strategies map explorer (https://experience.arcgis.com/experience/c32893afd06a44b883c6e341a71fc23c) to learn more about the data layers that influence the investment level designation of the property you referenced. This parcel is not currently identified within a growth area of a local jurisdiction per their certified comprehensive plan.
Action	N/A
Category	
	Individual Parcel Requests
Comment ID	17

Date(s)	10/6/2025
Submitted by	Janelle Cornwell
Affiliation	City of Lewes
Comment	The City of Lewes appreciates the ability to comment on the draft 2025 State Strategies. The City of Lewes has identified several areas on the draft maps that it would like to be considered for amendment. I have attached a PDF showing the 7 locations the city would like a change in designation. Below is a list of the properties/areas with an explanation. •40 Cape Henlopen Dr. – 335-5.00-7.00 Zoning I (Industrial Zone) The site is currently an industrial facility. 2025 State Strategies Map Designation – Out of Play Consideration – Level 2 or 3 •4th Street Preserve – 335-8.00-13.00 The parcel was recently deeded to the City for protected open space. A conservation easement has been placed on the property protecting it from development. 2025 State Strategies Map Designation – Level 1 Consideration – Out of Play •2-4 Bayview Ave – 335-4.20-178.01, 179.00 & 179.01 Zoning R-3 (Residential Beach Zone) The parcels contain houses. 2025 State Strategies Map Designation – Out of Play Consideration – Level 3 •7, 9 & 11 Cape Henlopen Dr. – 335-4.20-180.03, 180.04 & 180.05 Zoning R-3 (Residential Beach Zone) The parcels contain houses. 2025 State Strategies Map Designation – Out of Play Consideration – Level 3 •Pilottown Rd. – 335-4.00-5.00 Zoning: CF (Community Facilities Zone) The site is currently used as DNREC offices and facilities 2025 State Strategies Map Designation – Out of Play Consideration – Level 3 • Corner of Front St and W. Market St – 335-8.08-34.00 The site is a city park. Zoning: OS (Open Space Zone) 2025 State Strategies Map Designation – Level 1 Consideration – Out of Play •Georgia Ave. Bayview Apartments – 335-5.17-10.00 The site contains residential dwellings Zoning: R-3 (Residential Beach Zone) 2025 State Strategies Map Designation – Out of Play Consideration – Level 3 •Otis Smith Park – Between parcels 335-8.08-5.00 and 335-4.20-178.00 The site is a city park. Zoning: N/A The property is located within the city's right-of-way 2025 State Strategies Map Designation – Level 3 Consideration – Out of Play The city noticed that the bike trail is identified as Out of Play within a portion of the city limits; however, in the rest of the city and in the County, the bike trail is identified as Levels 1, 2, and 3. Based on the underlying data, it appears that the reason a portion of the trail within the city is Out of Play is that DNREC has it labeled as protected. The city
Response	• 40 Cape Henlopen Dr. – 335-5.00-7.00 - Removed from Out of Play • 4th Street Preserve – 335-8.00-13.00 - Move From Out Of Play • 2-4 Bayview Ave – 335-4.20-178.01, 179.00 & 179.01 - Remove From Out Of Play • 7, 9 & 11 Cape Henlopen Dr. – 335-4.20-180.03, 180.04 & 180.05 - Remove From Out Of Play • Corner of Front St and W. Market St – 335-8.08-34.00 - Move To Out Of Play • Georgia Ave. Bayview Apartments – 335-5.17-10.00 - Remove From Out Of Play • Otis Smith Park – Between parcels 335-8.08-5.00 and 335-4.20-178.00 - No Action, This area appears to be ROW and does not warrant any change • Pilottown Rd. – 335-4.00-5.00 - Remain Out of Play, Owned by DNREC
Action	Parcels were changed as noted.
Category	
	Individual Parcel Requests
Comment ID	18

Date(s)	10/7/2025
Submitted by	Kathy Kunkle
Affiliation	
Comment	In Milford city limits, east of Rt 1, your map shows Beaver Dam Rd as the location of a new Schell Brothers development currently being built. Half is in Level 1, half is in Level 2. The road fronting the development is labeled Beaver Dam Rd. That name has been discontinued and is now labeled on Google maps and has signage as Bucks Rd.
Response	Thank you for your comment. Our basemap is an automatic service from a company called ESRI and is not something we are able to have updated at the root data source.
Action	N/A
Category	
	Data Change Requests
Comment ID	19

Date(s)	10/8/2025
Submitted by	Christian Hudson
Affiliation	
Comment	The map for Coastal Highway between Broadkill and Cave Neck Roads hasn't changed in decades, yet this corridor—one of Delaware's busiest—is still labeled a "Level 4" area meant for "agricultural and environmental growth only." That ignores reality: two of the three intersections here are slated for over $50 million in grade separated highway upgrades, and the area already has water, sewer, and fiber infrastructure. It hosts an actual airport, major event venues, and multiple large residential developments underway as well as a host of commercial zoned properties and conditional commercial uses. Clearly, it's not "predominantly natural lands." State investment and land-use policy are misaligned here. Please revise this stretch of highway—specifically Hudson Fields—to a higher level to reflect existing infrastructure and actual growth patterns. The algorithm is highly punitive for this area and does not reflect reality.
Response	Thank you for your comment. Please be aware that this corridor is not a low priority even though parts of it are still Level 4. As you will see in the policy table from DelDOT, "Focus on regional movements between municipalities and other population centers and preserve and maintain existing facilities in safe working order." There are investments in all transportation corridors including Route 1. Additionally, see DelDOT's Corridor Capacity Program here (https://deldot.gov/Programs/corr_cap/index.shtml). These parcels are not currently identified within a growth area of a local jurisdiction per their certified comprehensive plan.
Action	N/A
Category	
	Individual Parcel Requests
Comment ID	20

Date(s)	10/8/2025
Submitted by	David Travis
Affiliation	Born and raised in Rehoboth Beach
Comment	Coastal Highway north of Lewes experiences heavy, year-round traffic from commuters and beachgoers alike. Accurate planning maps are critical for evacuations, emergency response, and routine safety operations. If this corridor continues to be treated as low-priority or underdeveloped, coordination among police, fire, and EMS will be increasingly difficult. Given the area's growing population and traffic volume, a modern classification of this region is essential to guide resource planning. Updating this section of Route 1 is not just about managing growth—it's a matter of public safety.
Response	Thank you for your comment. Please be aware that this corridor is not a low priority even though parts of it are still Level 4. As you will see in the policy table from DelDOT, "Focus on regional movements between municipalities and other population centers and preserve and maintain existing facilities in safe working order." There are investments in all transportation corridors including Route 1. Additionally, see DelDOT's Corridor Capacity Program here (https://deldot.gov/Programs/corr_cap/index.shtml).
Action	N/A
Category	
	Other
Comment ID	21

Date(s)	10/8/2025
Submitted by	Pamela Travis
Affiliation	Native Sussex County Delawarean, born and raised in Lewes, DE
Comment	Please upgrade the area around Eagle Crest Airport to Level 3 to accommodate updated maps, infrastructure spending and growth in this area. As state planners, your decisions to shape Delaware's future require updated information. Along Coastal Hwy north of Lewes, known as Eagle Crest Airport. We now have access to accurate data on traffic volumes, land use, and infrastructure demands. This data tells a very different story than shown on current Draft State Strategies maps that are still based on data made decades ago. Outdated maps means disinformation falsely presented to the public and erodes public trust. This corridor has clearly evolved by evidence. Its current designation as Level 4 no longer matches facts or community needs and is grossly outdated. Updating this corridor to Level 3 is a strategic move that will improve public confidence, support smarter infrastructure investment, and ensure that planning decisions are based on reality, not outdated models.
Response	The process for creating the Strategies for State Policies and Spending investment level designations is a data-driven process. Please refer to our data Story Map link (https://storymaps.arcgis.com/stories/0dade3116eb04ced807086a9260d1262) and the "Collaborative Update Process" in the policy document (https://stateplanning.delaware.gov/strategies/documents/2025-state-strategies-draft.pdf) to learn more. Click on the interactive strategies map explorer (https://experience.arcgis.com/experience/c32893afd06a44b883c6e341a71fc23c) to learn more about the data layers that influence the investment level designation of the property you referenced. These parcels are not currently identified within a growth area of a local jurisdiction per their certified comprehensive plan.
Action	N/A
Category	
	Individual Parcel Requests
Comment ID	22

Date(s)	10/9/2025
Submitted by	John Paradee
Affiliation	Brockstedt Mandalas Federico
Comment	Ref - Tax Parcels: 235-22.00-441.00; 235-22.00-442.00; 235-22.00-52.00; 235-16.00-50.03; 235-16.00-50.02; 235-16.00-77.00; 235-16.00-75.00; 235-22.00-38.04; 235-22.00-38.00; 23--22.00-38.01 • 235-22.00-39.00; 235-16.00-50.04; 235-22.00-440.00 On behalf of the owner of the parcels, we respectfully dispute the draft map designation of this property as Level 4 in the State Stategies for Policy and Spending Plan. Based on an objective review of the parcels charactristics and surrounding infrastructure, the designation is inconsistent with the plans stated methodology and with the state's own description of Level 3. We therefore request that the property be reclassified to Level 3, based on the following: 1. Water and Wastewater CPCN, 2. Airport Facility - Critical Infrasructure, 3. Major Highway Investments in Proximity, 4. Consistency with the State's definition of Level 3. By definition, this property does not meet the criteria for Level 4, which is reserved for areas where state investment is not anticipated, and development is highly discouraged. Instead, it reflects the very balance described under Level 3 including growth potential with infrastructure in place, alongside resources that require thoughtful planning. Given the verified CPCN utility coverage, the presence of an airport facility, proximity to major planned highway infrastructure, and consistency with the State's own definition of Level 3, it is inappropriate for this property to remain classified as Level 4. We respectfully request that the Office of State Planning Coordination revise the draft maps to reclassify the subject parcel from Level 4 to Level 3. Such a correction will ensure the maps reflect factual infrastructure conditions, ongoing state investments, and the parcel's role in supporting regional growth and economic vitality.
Response	The process for creating the Strategies for State Policies and Spending investment level designations is a data-driven process. Please refer to our data Story Map link (https://storymaps.arcgis.com/stories/0dade3116eb04ced807086a9260d1262) and the "Collaborative Update Process" in the policy document (https://stateplanning.delaware.gov/strategies/documents/2025-state-strategies-draft.pdf) to learn more. Click on the interactive strategies map explorer (https://experience.arcgis.com/experience/c32893afd06a44b883c6e341a71fc23c) to learn more about the data layers that influence the investment level designation of the property you referenced.
Action	N/A
Category	
	Individual Parcel Requests
Comment ID	23

Date(s)	10/10/2025
Submitted by	Ann Burruss
Affiliation	
Comment	The maps are fine. My comment is that the state of Delaware needs to put teeth behind the concept articulated in the document that the state will not spend tax payer dollars on development in Level 4. Developments that include parcels in Level 4 are approved in Sussex County regularly. The state then takes on costs that are not appropriate. The map is not worth the paper - or pixels - if development in Level 4 can be approved by counties at will. At the least the state should stipulate by law that the state will not take on costs associated with water, sewer or roads in Level 4 new developments. Require by law that developers must bond for long-term maintenance of systems other than fire/rescue.
Response	Thank you for your comment. We encourage you to contact your legislators to discuss your ideas.
Action	N/A
Category	
	Other
Comment ID	24

Date(s)	10/10/2025
Submitted by	Jill Hicks
Affiliation	Sussex Preservation Coalition
Comment	Thank you for giving us the opportunity to make comments. 1. I would like to see data points included that subtracts points for flooding potential or vulnerability for seal level rise. Infrastructure may exist in those areas, however that does not mean that we should encourage growth or further development. 2. Our County Administrator suggested at a Council meeting that taking a point for environmental sensitivities and then another for endangered species habitat is double dipping and the COunty would comment as such. PLease do not give that recommendation consideration. If an endangered species like the Delmarva Fox Squirrel or the barking tree frog live in an environmentally sensitive area, all the more reason to protect it. 3. I would like to see the data sets include more already known environmental hazards: floodplains, needed green infrastructure. Thank you. We have learned that within the past few days, a concerted effort has been made to question the designation of the Cool Spring lands as State Investment Level 4 . We are asking that the State not give in to pressure outside of this process. Thank you.
Response	1. Coastal inundation and the FRAM data which reflect flooding and coastal resiliency concerns are a part of the data analysis that leads to the strategies level designations. We acknowledge that there are towns and built areas that are going to be affected by coastal hazards that are designated as investment levels 1 and 2 because of existing population and infrastructure in those areas. In order to more clearly demonstrate parts of the state that are going to be impacted by coastal hazards we have developed an environmental overlay layer that will visibly include the coastal inundation, flood hazard areas, and ecological connectivity to our mapping series. 2. Regarding the Delaware Ecological Network (DEN) Layer, the resource agencies consider this to be a critical GIS dataset that identifies ecological connectivity and a wide variety of natural resources. It remains in the data analysis. OSPC has run further analysis to ensure the data more accurately reflects current land use conditions. The analysis removed areas appearing in 2022 Land Use Land Cover that depict "Built Lands" from the DEN. The final strategies maps will utilize this new layer. 3. Please refer to our data Story Map link (https://storymaps.arcgis.com/stories/0dade3116eb04ced807086a9260d1262). Please navigate to the "Promoting Preservation" section to explore the preservation datasets. We think you will find that all of the topics you are interested in are included in those layers. 4. Regarding your comment on Cool Springs, we note that the plan amendment that was reviewed as PLUS 2021-12-12 is still pending a decision before Sussex County. Should this amendment be approved by Sussex County and Cabinet Committee on State Planning Issues, we will consider this consistent with the Strategies for State Policies and Spending.
Action	N/A
Category	Environment/Sustainability/Resiliency
	Individual Parcel Requests
	Data Change Requests
Comment ID	25

Date(s)	10/10/2025
Submitted by	James Dick
Affiliation	
Comment	I agree with that the Level 4 designation of the Cool Spring Crossing parcel on Route 9 in Sussex County is the appropriate one and should be carried forward to the final version. That parcel is no different from other undeveloped parcels along Route 9 between Georgetown and Lewes, so changing it to a Level 2 or 3 would, as a practical matter, permit massive development along that entire distance. Providing State resources to the proposed Cool Spring development would inevitably take badly needed States funds away from the current Coastal Area to build infrastructure where there is little today. PLEASE keep the Cool Spring Crossing parcel Level 4.
Response	The process for creating the Strategies for State Policies and Spending investment level designations is a data-driven process. Please refer to our data Story Map link (https://storymaps.arcgis.com/stories/0dade3116eb04ced807086a9260d1262) and the "Collaborative Update Process" in the policy document (https://stateplanning.delaware.gov/strategies/documents/2025-state-strategies-draft.pdf) to learn more. Click on the interactive strategies map explorer (https://experience.arcgis.com/experience/c32893afd06a44b883c6e341a71fc23c) to learn more about the data layers that influence the investment level designation of the property you referenced. We note that the plan amendment that was reviewed as PLUS 2021-12-12 is still pending a decision before Sussex County. Should this amendment be approved by Sussex County and Cabinet Committee on State Planning Issues, we will consider this consistent with the Strategies for State Policies and Spending.
Action	N/A
Category	
	Individual Parcel Requests
Comment ID	26

Date(s)	10/10/2025
Submitted by	Alison Monroe
Affiliation	Lifelong Sussex County Resident
Comment	I am a lifelong resident of Sussex County, and I am opposed to changing any of Level 4 investment areas to Level 1, 2, or 3. I am particularly concerned about the land in the vicinity of Cool Spring. The explosion of growth and development in our RURAL areas needs to be curtailed. Protecting our natural habitats, forests, wetlands or our agricultural industry in Sussex County needs to be prioritized.
Response	The process for creating the Strategies for State Policies and Spending investment level designations is a data-driven process. Please refer to our data Story Map link (https://storymaps.arcgis.com/stories/0dade3116eb04ced807086a9260d1262) and the "Collaborative Update Process" in the policy document (https://stateplanning.delaware.gov/strategies/documents/2025-state-strategies-draft.pdf) to learn more. Click on the interactive strategies map explorer (https://experience.arcgis.com/experience/c32893afd06a44b883c6e341a71fc23c) to learn more about the data layers that influence the investment level designation of the property you referenced. We note that the plan amendment that was reviewed as PLUS 2021-12-12 is still pending a decision before Sussex County. Should this amendment be approved by Sussex County and Cabinet Committee on State Planning Issues, we will consider this consistent with the Strategies for State Policies and Spending.
Action	N/A
Category	
	Individual Parcel Requests
Comment ID	27

Date(s)	10/10/2025
Submitted by	Judy Rose Seoibert
Affiliation	
Comment	I beleive the area around Cool Spring and Route 9 which is outside of the Coastal Area, should stay Level 4 as in the Draft Investment Level Map.
Response	The process for creating the Strategies for State Policies and Spending investment level designations is a data-driven process. Please refer to our data Story Map link (https://storymaps.arcgis.com/stories/0dade3116eb04ced807086a9260d1262) and the "Collaborative Update Process" in the policy document (https://stateplanning.delaware.gov/strategies/documents/2025-state-strategies-draft.pdf) to learn more. Click on the interactive strategies map explorer (https://experience.arcgis.com/experience/c32893afd06a44b883c6e341a71fc23c) to learn more about the data layers that influence the investment level designation of the property you referenced. We note that the plan amendment that was reviewed as PLUS 2021-12-12 is still pending a decision before Sussex County. Should this amendment be approved by Sussex County and Cabinet Committee on State Planning Issues, we will consider this consistent with the Strategies for State Policies and Spending.
Action	N/A
Category	
	Individual Parcel Requests
Comment ID	28

Date(s)	10/10/2025
Submitted by	Madeleine Bayard
Affiliation	Rotary Club of Wilmington
Comment	As the Rotary Club of Wilmington, we'd like to emphasize the importance of incentivizing and investing in Early Childhood Education facilities to fill the shortage in supply (only 1 spot for every 2 children in Delaware in child care), which will contribute to our economy and workforce supply, as well as support young families and business coming to Delaware. We support the American Planning Association's policy positions on ECE:. the inclusion of child care policies as part of state and local planning policies, ii. legislation which provides for small child care homes as permitted land uses in all zoning districts without standard home occupation restrictions; amending local zoning ordinances to remove obstacles to the provision of regulated child care; encourage negotiation with developers to provide space for child care in all types of projects. Please consider any planning tools you can include so our workforce can continue to work and children get a strong start.
Response	Thank you for your comment. Your comment references legislative changes to local government land use ordinances related to child care. Please be aware that this is outside the scope of the State Strategies for Policies and Spending, but we wish you luck in this worthwhile endeavor.
Action	N/A
Category	
	Other
Comment ID	29

Date(s)	10/10/2025
Submitted by	Suzanne Harper
Affiliation	
Comment	If the Cool Spring area remains designated "Out of Play" or Level 4 as shown on the Draft Investment Level Map accompanying the 9/08/25 draft document "2025 Delaware State Strategies" I rate the map (only) as 5 stars, as I have concerns about some of the verbiage in the rest of the document. However, as a 14 year resident of Sussex County, who has been attentively attending all relevant meetings and readling all the information regarding the unacceptable proposed development in the vicinity of Cool Spring, now before the Sussex County Council. I want to register my emphatic conviction that this land which is outside the Coastal Area on U.S. 9, should remain designated as Level 4/ Out of Play, as has been the state's position to date in every prior Investment Level Map. If over time, the character of this area is no longer rural, as substantiated by about 40 objective data collection points, this designation can be revisited in no more than 5 years in the future.
Response	The process for creating the Strategies for State Policies and Spending investment level designations is a data-driven process. Please refer to our data Story Map link (https://storymaps.arcgis.com/stories/0dade3116eb04ced807086a9260d1262) and the "Collaborative Update Process" in the policy document (https://stateplanning.delaware.gov/strategies/documents/2025-state-strategies-draft.pdf) to learn more. Click on the interactive strategies map explorer (https://experience.arcgis.com/experience/c32893afd06a44b883c6e341a71fc23c) to learn more about the data layers that influence the investment level designation of the property you referenced. We note that the plan amendment that was reviewed as PLUS 2021-12-12 is still pending a decision before Sussex County. Should this amendment be approved by Sussex County and Cabinet Committee on State Planning Issues, we will consider this consistent with the Strategies for State Policies and Spending.
Action	N/A
Category	
	Individual Parcel Requests
Comment ID	30

Date(s)	10/10/2025
Submitted by	Ann Marie Thompson
Affiliation	Resident of Milton
Comment	As far as I'm concerned this is over development of Milton. The infrastructure will never accommodate all these homes . The traffic is terrible and getting worse the more homes are built. The residence of this area want to keep the farmland if you get rid of the farms we won't have food. Plus the hospitals are over crowded. It takes forever to get an appointment with a doctor. 3 years ago I had a heart attack and needed a cardiac cath . I waiting in the cath area for 12 hours for a cath . Yes 12 hours bc there weren't enough doctors to do the cath and there was awaiting list. Is this what you want for your mother, father , sister brother or any member of your family??? God was with me that day!! I don't want a huge development like cool springs anywhere near Milton. You Need to concentrate on a larger hospital to accommodate all these elderly people that are retiring down here.
Response	The process for creating the Strategies for State Policies and Spending investment level designations is a data-driven process. Please refer to our data Story Map link (https://storymaps.arcgis.com/stories/0dade3116eb04ced807086a9260d1262) and the "Collaborative Update Process" in the policy document (https://stateplanning.delaware.gov/strategies/documents/2025-state-strategies-draft.pdf) to learn more. Click on the interactive strategies map explorer (https://experience.arcgis.com/experience/c32893afd06a44b883c6e341a71fc23c) to learn more about the data layers that influence the investment level designation of the property you referenced. We note that the plan amendment that was reviewed as PLUS 2021-12-12 is still pending a decision before Sussex County. Should this amendment be approved by Sussex County and Cabinet Committee on State Planning Issues, we will consider this consistent with the Strategies for State Policies and Spending.
Action	N/A
Category	
	Individual Parcel Requests
Comment ID	31

Date(s)	10/10/2025
Submitted by	Valerie A. Wood
Affiliation	
Comment	The SIL 4 and out of play areas should be expanded, not decreased. As we face oncoming weather challenges there is no logical reason to expand SIL 1 and 2 regardless of what the development community argues.
Response	Coastal inundation and the FRAM data which reflect flooding and coastal resiliency concerns are a part of the data analysis that leads to the strategies level designations. We acknowledge that there are towns and built areas that are going to be affected by coastal hazards that are designated as investment levels 1 and 2 because of existing population and infrastructure in those areas. In order to more clearly demonstrate parts of the state that are going to be impacted by coastal hazards we have developed an environmental overlay layer that will visibly include the coastal inundation, flood hazard areas, and ecological connectivity to our mapping series.
Action	N/A
Category	Environment/Sustainability/Resiliency
	Data Change Requests
Comment ID	32

Date(s)	10/10/2025
Submitted by	Alan Roth
Affiliation	
Comment	1) As a City of Lewes resident, I find the map perversely out of sync with our area's actual State investment needs and with your video explanations of its purposes re: State investment strategies. What's the point of treating "in-town" Lewes or Rehoboth as Level 1 areas in need of significant State funding and investment while presumably giving lesser funding and investment to the Level 2 and 3 areas on our borders -- the very sources of our overdevelopment, traffic congestion, school overcrowding, etc. IMHO, you have it precisely backwards, and you are giving developers an excuse to make a bad problem even worse, with less support from the State than is needed. 2) Re: my last point, the last video, "Why Do We Have State Strategies?", is the most important. You should emphasize this is about STATE investment and funding decisions, NOT about giving attorneys another talking point about why planning commissions and city councils should approve their clients' development plans. Comment #2, in follow-up to my previous comment: Page 10 of your draft State Strategies document contains a chart labeled "Figure 2: State Strategies Policy Framework." As an element of "Smart Growth," you propose to "Promote Growth in Levels 1 &2 to enable compact mixed-use development, infill, and redevelopment in county growth areas, and municipalities." Please reconsider this framework entirely. Inside the City of Lewes, WE ARE CHOKING! Even off-season, we can't get to a supermarket, a drugstore, or other necessities, much less conveniences like a gym, without idling in traffic on Kings Hwy, Savannah Rd, Wescoats Rd, or Rt 1 for an absurd length of time. That's BEFORE DelDOT begins its Kings Hwy and Old Orchard Rd projects. "Smart growth" would mean first letting the necessary infrastructure catch up with the overwhelming growth that's already been permitted. What's gone on in this area of Sussex County to date has been quite the opposite of "smart."
Response	Thank you for your comment. Please be aware that this is the State's policy framework for investment in infrastructure and services. Within Level 1 and Level 2, local governments are still expected to implement their comprehensive plans and land use regulations to ensure the quality of life in their communities.
Action	N/A
Category	
	Other
Comment ID	33

Date(s)	10/10/2025
Submitted by	Denise Monroe
Affiliation	Sussex County Resident
Comment	The top priority of the future land use map in Sussex County should be to protect, preserve and maintain our Level 4 areas. I am most concerned with the area outside the coastal zone near the cool spring area on RT 9. The over-development in our rural and agricultural areas needs to stop!
Response	The process for creating the Strategies for State Policies and Spending investment level designations is a data-driven process. Please refer to our data Story Map link (https://storymaps.arcgis.com/stories/0dade3116eb04ced807086a9260d1262) and the "Collaborative Update Process" in the policy document (https://stateplanning.delaware.gov/strategies/documents/2025-state-strategies-draft.pdf) to learn more. Click on the interactive strategies map explorer (https://experience.arcgis.com/experience/c32893afd06a44b883c6e341a71fc23c) to learn more about the data layers that influence the investment level designation of the property you referenced. We note that the plan amendment that was reviewed as PLUS 2021-12-12 is still pending a decision before Sussex County. Should this amendment be approved by Sussex County and Cabinet Committee on State Planning Issues, we will consider this consistent with the Strategies for State Policies and Spending.
Action	N/A
Category	
	Individual Parcel Requests
Comment ID	34

Date(s)	10/10/2025
Submitted by	Jamin Hudson
Affiliation	Land Owner Sussex County
Comment	I believe all land east of Rt. 1 & fronting Rt. 1from Cave Neck Rd (south) to Broadkill Rd (north)—should be classified as Level 2. Per Delaware State Strategies Level 2 definition Mid to low-density development Access to public water, wastewater, and utilities More automobile-oriented Existing Conditions in defined area 1) Utilities & Infrastructure Artesian sewage line runs parallel to Rt 1 (east side) from Broadkill Rd to Cave Neck Rd. Artesian water line runs along Hudson Rd. Rt 16 overpass and planned Cave Neck Rd improvements enhance access. 2) Transportation Connectivity Rt 1 is the state's main north–south corridor. East–west roads (Cave Neck, Eagles Crest, Hudson, Rt 16) provide strong interconnectivity. 3) Existing Development Includes Paynter's Mill, Red Fox Run, Overbrook Shores, Vincent Overlook, Windstone, River Rock Run, Eagles Crest HOA, Heron Wood, Pintail Point, Ocean One Holdings, and others—consistent with low-density Level 2 character.
Response	The process for creating the Strategies for State Policies and Spending investment level designations is a data-driven process. Please refer to our data Story Map link (https://storymaps.arcgis.com/stories/0dade3116eb04ced807086a9260d1262) and the "Collaborative Update Process" in the policy document (https://stateplanning.delaware.gov/strategies/documents/2025-state-strategies-draft.pdf) to learn more. Click on the interactive strategies map explorer (https://experience.arcgis.com/experience/c32893afd06a44b883c6e341a71fc23c) to learn more about the data layers that influence the investment level designation of the property you referenced. These parcels are not currently identified within a growth area of a local jurisdiction per their certified comprehensive plan.
Action	N/A
Category	
	Individual Parcel Requests
Comment ID	35

Date(s)	10/10/2025
Submitted by	Mark Monroe
Affiliation	Sussex County Resident
Comment	I am concerned about the over development of our rural areas particularly near the Cool spring property. When development happens where it is not designated or zoned to happen, we are infringing on the rights of those who already live here. Sussex County has seen an unprecedented level of growth in rural communities that were meant for preservation and agriculture. Level 4 zones must be left entact.
Response	The process for creating the Strategies for State Policies and Spending investment level designations is a data-driven process. Please refer to our data Story Map link (https://storymaps.arcgis.com/stories/0dade3116eb04ced807086a9260d1262) and the "Collaborative Update Process" in the policy document (https://stateplanning.delaware.gov/strategies/documents/2025-state-strategies-draft.pdf) to learn more. Click on the interactive strategies map explorer (https://experience.arcgis.com/experience/c32893afd06a44b883c6e341a71fc23c) to learn more about the data layers that influence the investment level designation of the property you referenced. We note that the plan amendment that was reviewed as PLUS 2021-12-12 is still pending a decision before Sussex County. Should this amendment be approved by Sussex County and Cabinet Committee on State Planning Issues, we will consider this consistent with the Strategies for State Policies and Spending.
Action	N/A
Category	
	Individual Parcel Requests
Comment ID	36

Date(s)	10/10/2025
Submitted by	Alison White
Affiliation	
Comment	I'm a Sussex County resident who lives close to the proposed Cool Spring Crossing development. I understand there's an effort to contest the designation of the Cool Spring area as Level 4. I can attest that this area is rural, despite the developer's attempts to claim otherwise. Two state strategy cycles in a row have classified it as rural, using a data-driven, objective methodology; the U.S. Census Bureau also classifies it as rural. Overdevelopment in Sussex County is at a crisis point because developers have been allowed to build wherever they want, with no regard for infrastructure needs. Several times I have heard state officials express frustration over Sussex government's repeated approval of development in areas where the state has no plans for investment. It is outrageous that the development community presumes to demand that the state change its investment plans as reflected by the state planning classification, in response to their business wishes. I oppose the change.
Response	The process for creating the Strategies for State Policies and Spending investment level designations is a data-driven process. Please refer to our data Story Map link (https://storymaps.arcgis.com/stories/0dade3116eb04ced807086a9260d1262) and the "Collaborative Update Process" in the policy document (https://stateplanning.delaware.gov/strategies/documents/2025-state-strategies-draft.pdf) to learn more. Click on the interactive strategies map explorer (https://experience.arcgis.com/experience/c32893afd06a44b883c6e341a71fc23c) to learn more about the data layers that influence the investment level designation of the property you referenced. We note that the plan amendment that was reviewed as PLUS 2021-12-12 is still pending a decision before Sussex County. Should this amendment be approved by Sussex County and Cabinet Committee on State Planning Issues, we will consider this consistent with the Strategies for State Policies and Spending.
Action	N/A
Category	
	Individual Parcel Requests
Comment ID	37

Date(s)	10/10/2025
Submitted by	Mark Davidson
Affiliation	Pennoni
Comment	I have serious concerns regarding the draft State Strategies for Policy and Spending Plan. While I support the Plan's goals, its flawed methodology compromises its accuracy and usefulness. The maps, which local governments rely on for comprehensive planning, are fundamentally inaccurate, misleading, and risk politicizing the process. The core issues are as follows: 1. Distorted Scoring System: The equal-weighting "plus/minus" system creates a false sense of neutrality by allowing a single environmental factor to negate the score of a parcel with significant growth potential and existing infrastructure. This ignores existing strong regulatory frameworks and misrepresents true growth potential. 2. Inconsistent Investment Levels: The framework's logic is undermined by arbitrary and unexplained gaps, jumping from Level 2 directly to Level 4. This inconsistent application gives the impression of arbitrary mapping rather than a rational, graduated framework. 3. Erasing Facts from the Map: The Plan improperly ignores existing utility infrastructure if it falls outside a designated growth zone. Utilities are factual realities, not political designations. Omitting them distorts the baseline data and misleads local governments, putting a thumb on the scale against areas with existing infrastructure. 4. Ignoring Active Planning: By including only finalized Transportation Improvement Districts (TIDs), the Plan discards years of collaborative planning efforts and misrepresents where future resources are being targeted. It ignores the pipeline of active projects. 5. Excluding Major Investments: The complete absence of highway and capital projects is a glaring omission that invalidates the maps as a guide for state spending. Transportation infrastructure is the backbone of growth, and ignoring it severely compromises the Plan's credibility. I urge the State to revise the methodology to be fact-based, consistent, and transparent. The scoring system must reflect reality, and all existing and planned infrastructure and planning efforts must be accurately represented. Without these changes, the Plan is unsuitable for guiding Delaware’s future growth and investment.

Response	1. "Equal Weighting" is done in the interest and spirit of depth in the analysis. Environmental protections and elements should not be watered down in their mapped representation, doing so would not honor the very protections mentioned herein. Developing the State Strategies map is a coordinated, data-driven process involving more than 40 datasets. To compile the map and create the investment level geographies, each dataset is assigned a value based on its classification as “promoting growth”, “promoting preservation” and “out of play”. Datasets considered to promote growth are processed to a statewide polygon and assigned a value of “+1” for their respective Area of Interest (AOI) while datasets that promote preservation are processed to a statewide polygon and assigned a value of “-1” for their respective AOI, and finally datasets that are out of play will supersede any other overlapping datasets in the analysis. While it is true that there are areas of overlap in the data for areas promoting preservation it is just as true that there are areas of overlap promoting growth. Many times, hospitals, EMS facilities and fire stations overlap one another in addition to adding elements that would also seek to reenforce the growth zones that local jurisdictions have outlined in their thorough efforts to generate and update their comp plans. 2. While "Hard Lines" in state strategies are present they are a direct result of many growth items overlapping one another (I.e. Hospital, EMS, Town Boundaries, Local Police). These events are noticed where a line in planning has been drawn and other environmental factors are not fully offset or overcome by these prevailing growth elements. The strategies is a data-driven process and we don't arbitrarily add investment levels for any other purpose. 3. Private water and wastewater infrastructure outside of growth areas, as identified in local government comprehensive plans, is not included in the analysis. Private wastewater service outside of growth zones encourages and enables rural sprawl, which is contrary to the purpose of the State Strategies to promote compact, mixed use development in areas identified for growth by local governments. At the request of Sussex County, the OSPC has engaged with Artesian Water Company Incorporated. Artesian has discussed and described their wastewater transmission and treatment infrastructure in Sussex County. Collaborative discussions are continuing but at this point, no data has been shared due to concerns about security and proprietary business information. With that said, this wastewater transmission and treatment system is critical to future growth and development of Sussex County and needs to be carefully considered as Sussex County updates its comprehensive plan. 4. Active TID’s were included based on guidance from our agency partners in DelDOT. TIDs are works in progress and are subject to change until they are finalized and the MOU is signed between the local jurisdiction(s) and DelDOT. Relying upon TIDs for future planning efforts requires that the TIDs be activated and in place. 5. Our data analysis includes relevant data provided to us by DelDOT and their partners DTC including transit network, transportation improvement districts, bicycle and pedestrian connectivity, and transit areas. It is important to note that DelDOT capital transportation projects have a wide variety of purposes, including capacity, safety, and regional transportation movements, and not all of them are promoting growth. DelDOT is working on some new planning efforts that may result in additional transportation data becoming available in the future.
Action	N/A
Category	
	Data Change Requests
Comment ID	38

Date(s)	10/10/2025
Submitted by	Shelly Cecchett
Affiliation	Kent Sussex Leadership Alliance
Comment	On behalf of the Kent Sussex Leadership Alliance, we appreciate the State's efforts to align growth management with infrastructure planning and resource stewardship. However, we share concerns raised by the Home Builders Association regarding the accuracy and practicality of the current draft. Local governments rely on these maps to guide comprehensive planning. It is essential that the methodology reflects real-world conditions, including existing infrastructure and planned investments, and that it provides a clear, consistent framework for prioritizing growth areas. We respectfully urge the State to revisit the scoring system and mapping approach to ensure they are transparent, fact-based, and supportive of coordinated growth and infrastructure planning. Doing so will strengthen the Plan's credibility and usefulness as a guiding document. Thank you for considering these comments. We look forward to working collaboratively to achieve a balanced and effective strategy for Delaware's future.
Response	Thank you for your comments and for the Kent Sussex Leadership Alliance's commitment to economic development and planned growth. The state strategies data analysis and mapping process has been the most transparent and accurate effort to date. The resulting strategy maps accurately reflect the state's priorities for investments based on local government comprehensive plans. The process for creating the Strategies for State Policies and Spending investment level designations is data-driven and based upon currently adopted and validated data sources. Areas in this analysis are objective only to the data included in its generation, The analysis will continue to be generated with data as the focus and remain unchanged from outside pressures. Developing the State Strategies map is a coordinated, data-driven process involving more than 40 datasets. To compile the map and create the investment level geographies, each dataset is assigned a value based on its classification as "promoting growth", "promoting preservation" and "out of play". Datasets considered to promote growth are processed to a statewide polygon and assigned a value of "+1" for their respective Area of Interest (AOI) while datasets that promote preservation are processed to a statewide polygon and assigned a value of "-1" for their respective AOI, and finally datasets that are out of play will supersede any other overlapping datasets in the analysis. While it is true that there are areas of overlap in the data for areas promoting preservation it is just as true that there are areas of overlap promoting growth. Many times, hospitals, EMS facilities and fire stations overlap one another in addition to adding elements that would also seek to reenforce the growth zones that local jurisdictions have outlined in their thorough efforts to generate and update their comp plans.
Action	N/A
Category	
	Data Change Requests
Comment ID	39

Date(s)	10/10/2025
Submitted by	J. Michael Riemann
Affiliation	HBA
Comment	On behalf of the undersigned business and professional associations, we write to express serious concerns regarding the methodology and conclusions of the draft State Strategies for Policy and Spending Plan. While we support the State's intent to align growth management with infrastructure planning and resource stewardship, the current draft contains methodological flaws that compromise its accuracy and undermine its usefulness as a guiding document. Because these maps are relied upon by local governments as they update their comprehensive plans, they must be factual, consistent, and transparent. Unfortunately, the current version introduces distortions that risk politicizing the process and misrepresenting where Delaware has already invested in growth-enabling infrastructure. 1. Equal Weighting of Attributes Oversimplifies Complex Realities - The Plan uses a "plus/minus" system in which all attributes are weighted equally. A parcel inside a growth zone or municipality receives only a +1, yet if the same parcel contains an environmental feature, it is reduced by –1 and effectively erased from the growth map. This approach ignores the fact that environmental protections (wetlands, buffers, floodplains) already exist within a strong regulatory framework and do not disappear simply because a map assigns a positive score. By flattening all attributes into a binary system, the methodology creates "false neutrality," obscuring true growth potential in areas where infrastructure and policy clearly favor development. 2. Inconsistent Level Transitions Undermine the Framework - The Plan establishes four levels of investment priority, suggesting a graduated framework. Yet in the draft, we see abrupt jumps from Level 2 directly to Level 4, skipping Level 3 entirely. These gaps create the impression of arbitrary mapping, not a rational continuum. If Level 3 is intended to represent transitional areas or moderate priority, its absence in large swaths of the State undermines the very logic of the system. It is clear that these maps eschew common sense in favor of a dogmatic adherence to the flawed criteria and points system. 3. Utilities and Growth Zones – Facts Must Drive The Plan's treatment of utilities introduces one of the most significant flaws in the scoring system: it simply ignores the presence of utilities on the ground if they happen to fall outside a designated growth zone. This approach is problematic for two reasons: · Utilities are factual conditions: Water and sewer infrastructure either exist or they do not. These are not political designations, but physical realities. To erase them from the maps is to distort the baseline data. Local governments depend on these maps to update their comprehensive plans; when the maps omit existing utilities, they mislead the very process they are supposed to inform. This is particularly apparent when a locality utilizes these maps as an aid to identifying or modifying their growth zones during their comprehensive plan process. · Growth zones already carry weight: A parcel inside a growth zone already earns a +1 for its location. If utilities exist there, the score should compound (+1 for growth zone, +1 for utilities = +2). By the same logic, utilities outside a growth zone should still count (+1), though without the growth zone bonus. Instead, the draft Plan treats utilities outside boundaries as though they do not exist at all. The result is a skewed picture that effectively puts a thumb on the scale, not by weighing factors differently, but by erasing inconvenient facts. A map that claims to guide state investment must be built on reality, not selective scoring. In short, the methodology undermines the credibility of both growth and preservation designations by allowing the scoring framework to overrule on-the-ground facts and regulatory realities. Maps that are meant to be factual should reflect what exists, not tilt the scales toward or against development based on arbitrary scorekeeping. 4. Discounting TIDs Until Final Adoption Ignores Planning Intent - The Plan includes only "finalized" Transportation Improvement Districts (TIDs) while disregarding areas under active study. This practice is deeply problematic: · TIDs require coordination among DelDOT, counties, and municipalities—clear evidence of shared growth planning intent. · Excluding them until the last procedural step effectively erases years of collaborative planning and misrepresents

	where resources are already being targeted. In other words, the maps capture only the “finished product” but not the pipeline of active projects. For a plan whose purpose is to chart future state spending, this is a glaring omission. 5. Highway and Capital Investments Entirely Absent - Perhaps the most striking flaw is the absence of any recognition of major highway or capital projects. The Plan ignores: · Recently completed road improvements, · Fully funded projects in the six-year Capital Transportation Plan, and · Long-range corridor upgrades under DelDOT review.Transportation infrastructure is the backbone of growth. To omit it from a “State Strategies for Spending” map is like publishing a household budget that ignores the mortgage—it leaves out the largest and most consequential investment. This omission alone severely compromises the maps’ validity as a guide to where Delaware is putting its resources. Request for Revision For the Plan to achieve its stated purpose, we respectfully urge the State to: 1. Reevaluate the scoring system to reflect relative importance, not equal weighting of all factors. 2. Ensure consistent application of the four-level framework, with no unexplained gaps. Utilize common sense to transition between investment levels. 3. Recognize utilities as factual infrastructure, both inside and outside growth zones, with proportional weighting. 4. Incorporate all TIDs under study, not just finalized districts. The maps should have +1 for parcels of land in a proposed TID and +2 for parcels of land within an active TID. 5. Include existing and planned highway/capital projects as a core element of the mapping process. Without these corrections, the maps will remain incomplete, biased, and potentially misleading— unsuitable for guiding investment, land use decisions, or regulatory policy. We appreciate the opportunity to provide these comments and stand ready to collaborate with the State in developing a more accurate, transparent, and effective framework for Delaware’s future.
Response	1. "Equal Weighting" is done in the interest and spirit of depth in the analysis. Environmental protections and elements should not be watered down in their mapped representation, doing so would not honor the very protections mentioned herein. Developing the State Strategies map is a coordinated, data-driven process involving more than 40 datasets. To compile the map and create the investment level geographies, each dataset is assigned a value based on its classification as “promoting growth”, “promoting preservation” and “out of play”. Datasets considered to promote growth are processed to a statewide polygon and assigned a value of “+1” for their respective Area of Interest (AOI) while datasets that promote preservation are processed to a statewide polygon and assigned a value of “-1” for their respective AOI, and finally datasets that are out of play will supersede any other overlapping datasets in the analysis. While it is true that there are areas of overlap in the data for areas promoting preservation it is just as true that there are areas of overlap promoting growth. Many times, hospitals, EMS facilities and fire stations overlap one another in addition to adding elements that would also seek to reenforce the growth zones that local jurisdictions have outlined in their thorough efforts to generate and update their comp plans. 2. While "Hard Lines" in state strategies are present they are a direct result of many growth items overlapping one another (I.e. Hospital, EMS, Town Boundaries, Local Police). These events are noticed where a line in planning has been drawn and other environmental factors are not fully offset or overcome by these prevailing growth elements. The strategies is a data-driven process and we don't arbitrarily add investment levels for any other purpose. 3. Private water and wastewater infrastructure outside of growth areas, as identified in local government comprehensive plans, is not included in the analysis. Private wastewater service outside of growth zones encourages and enables rural sprawl, which is contrary to the purpose of the State Strategies to promote compact, mixed use development in areas identified for growth by local governments. At the request of Sussex County, the OSPC has engaged with Artesian Water Company Incorporated. Artesian has discussed and described their wastewater

	transmission and treatment infrastructure in Sussex County. Collaborative discussions are continuing but at this point, no data has been shared due to concerns about security and proprietary business information. With that said, this wastewater transmission and treatment system is critical to future growth and development of Sussex County and needs to be carefully considered as Sussex County updates its comprehensive plan. 4. Active TID's were included based on guidance from our agency partners in DelDOT. TIDs are works in progress and are subject to change until they are finalized and the MOU is signed between the local jurisdiction(s) and DelDOT. Relying upon TIDs for future planning efforts requires that the TIDs be activated and in place. 5. Our data analysis includes relevant data provided to us by DelDOT and their partners DTC including transit network, transportation improvement districts, bicycle and pedestrian connectivity, and transit areas. It is important to note that DelDOT capital transportation projects have a wide variety of purposes, including capacity, safety, and regional transportation movements, and not all of them are promoting growth. DelDOT is working on some new planning efforts that may result in additional transportation data becoming available in the future.
Action	N/A
Category	
	Data Change Requests
	Private Sewer
	Other
Comment ID	40

Date(s)	10/10/2025
Submitted by	Mark Nardone
Affiliation	Rethinking Delaware
Comment	1) We urge the inclusion of measurable public health goals and goals for climate resiliency in the State Strategies (suggestions below). 2) We strongly believe that the Secretary of Health and Social Services be included on the CCSPI. 3) We urge OSPC to coordinate an effort of local planners to re-examine Level 1 investment areas, looking specifically for new opportunities for development, redevelopment and infill. 4) Mapping should clearly indicate that new state investments will not be prioritized in high-risk, flood-prone areas. 5) The Public Service Commission should also be bound by State Strategies in its decision making. 6) OSPC should be included in the budget review process to ensure that policies and practices of state agencies align with State Strategies. More specifically: Under "Goals" (page 8) 7) Item 5: Add, "Prioritize approval of affordable housing projects and compact, mixed use, walkable, bikeable, transit-supportive, inclusive, communities," specifically in appropriate level 1 and 2 areas, with level 3 in reserve. 8) Add item: "Increase Delaware's adaptive capacity and resilience to current and projected climate change impacts" to acknowledge the growing risks associated with sea-level rise, flooding, extreme heat, and other climate-driven hazards, and to emphasize the need for proactive adaptation measures. 9) Add item: "Promote the health and general well-being of all Delawareans by providing opportunity for increased to physical activity in their neighborhoods and access to public open space for outdoor recreation." 10) Add item: "Promote mobility for people and goods through a balanced system of transportation options." Under "Cabinet Committee Policy Statement" (page 8) 11) CCSPI should require (strike "encourage") state agencies to implement state strategies and policies through daily business practices. CCSPI should, by some legal means, also require local governments to adhere to state strategies. Under "Cabinet Committee Policy Statement" (page 9) 12) Revise to read "State Strategies seek to prioritize…" (strike incentivize) 13) Revise the third paragraph, beginning "The State Strategies seek to discourage to read, "The goal of State Strategies is to discourage sprawling growth…" 14) Strike "incentivizing: natural resources and revise to read "by strengthening support for…" "State Strategies Framework and Feedback on Levels" (page 10) 15) In the last paragraph, include "reduce the vulnerability of communities to the impacts of climate change." Under "Promoting Growth" (page 15) 16) Define "Municipal Annexation Areas." 17) Shorten distances for access to public transit by 0.25 miles in all cases. Under "Promoting Preservation" (page 15) 18) Increase the sea level rise scenario from 3 to 5 feet. Under "Out of Play" (page 15) 19) Work with Sussex County players to designate 100-year floodplains "Out of Play." Under "investment Level Profile" (pages 17-21) 20) For Level 1, clarify "urban centers in unincorporated areas." We assume they describe places like Hockessin and Glasgow, unincorporated areas with clusters of commercial and residential development. Because they are not municipalities, and because they appear suburban in character, the term "urban" is misleading. 21) We also recommend revising the description of Level 3 as "projected future growth areas," which could have the unintended result of shifting development pressure from Levels 1 and 2 toward areas that are less suitable for growth. Level 3 should be "reserved" as "future growth areas." Under Maps For all maps, please indicate major roadways for purposes of visualization. Layers that show commuter rail lines and fixed-route bus routes would also be helpful.

	New Castle County (page 23) 22) Please reclassify Level 3 areas nearest the shoreline near New Castle as Level 4. Low-lying areas are critical for coastal resilience. Kent County (page 24) 23) Please reclassify Level 4 areas east of SR1 "Out of Play." Those areas are also critical for resilience. Despite the minimal development, any new development will have an impact on the bordering marshes, which should be allowed to migrate with sea level rise. Work with the county and landowners to ease or otherwise conserve those properties. Sussex County (page 25) 24) Please redesignate Level 4 areas east of SR1 "Out of Play." As above, those areas are critical for resilience and marsh migration. 25) Reclassify Level 3 Investment areas in the Inland Bays Watershed to Level 4 or Out of Play for the reasons above and to preserve water quality and habitat in the inland bays. 26) Several Level 1 areas overlap with 100-year floodplains. One hundred-year floodplains should not be included in Level 1 and Level 2 designations. Under "Integration with Other State Agency Efforts" (pages 28-29) 27) In the first paragraph, include a statement that individual departments should be required to review their policies and practices to align with State Strategies. 28) In general, include the Delaware Department of Transportation, the Delaware Emergency Management Agency and the Department of Health and Social Services on the CCSPI to strengthen land-use decisions and improve public health. Under "Policy Recommendations" (pages 30-49) 29) To be more useful to the reader of the document, it would be helpful to also cross-index the policy tables by compiling each department's relevant policies and organizing them by level to show how they align specifically for that area. Under "Agency Recommendations" (page 51) 30) Examine the feasibility of restricting TIIF and Site Readiness Funds in Level 4.
Response	1) We urge the inclusion of measurable public health goals and goals for climate resiliency in the State Strategies (suggestions below). See responses below. 2) We strongly believe that the Secretary of Health and Social Services be included on the CCSPI. This suggestion with be forwarded to the Cabinet Committee on State Planning Issues for consideration. 3) We urge OSPC to coordinate an effort of local planners to re-examine Level 1 investment areas, looking specifically for new opportunities for development, redevelopment and infill. The OSPC regularly works with local government partners on redevelopment and infill opportunities, through the Downtown Development District program and other comprehensive planning initiatives. This suggestion for some specific outreach to local partners will be considered as we implement the State Strategies. 4) Mapping should clearly indicate that new state investments will not be prioritized in high-risk, flood-prone areas. A new map was added and referenced in the document: "As a companion to the Investment Levels, the Cabinet Committee on State Planning Issues has released a map of Ecological Lands of Significance to display key environmental data layers and demonstrate their relationship to each other and potential growth areas. This map helps identify areas that need to be protected, areas that need to be developed with environmental context, and vulnerable areas where development should be discouraged." 5) The Public Service Commission should also be bound by State Strategies in its decision making. This suggestion will require changes to the Public Service Commission's statutes, requiring legislative action. 6) OSPC should be included in the budget review process to ensure that policies and practices of state agencies align with State Strategies. The OSPC is located within the Office of Management and Budget. The OSPC is engaged in both formal and informal capacities as State agency capital projects are reviewed for inclusion in the budget to ensure compliance with the State Strategies. More specifically: Under "Goals" (page 8) 7) Item 5: Add, "Prioritize approval of affordable housing projects and compact, mixed use, walkable, bikeable, transit-supportive, inclusive, communities," specifically in appropriate level 1 and 2 areas, with level 3 in reserve. The goals

in this section represent the original 11 goals and will not be revised at this time. However, please note that these comments are directly reflected in the State Strategies Policy Framework (see Figure 2, page 10) that is the guide for State Strategies implementation.

8) Add item: "Increase Delaware's adaptive capacity and resilience to current and projected climate change impacts" to acknowledge the growing risks associated with sea-level rise, flooding, extreme heat, and other climate-driven hazards, and to emphasize the need for proactive adaptation measures. The section titled, "Integration with Other State Agency Efforts" addresses the importance of coordinating State Strategies implementation with other state agency plans. The Climate Action Plan is specifically referenced, and the goals of that plan cover the suggested text.

9) Add item: "Promote the health and general well-being of all Delawareans by providing opportunity for increased to physical activity in their neighborhoods and access to public open space for outdoor recreation." The goals in this section represent the original 11 goals and will not be revised at this time. However, please note that health is covered under Goals 9 and 10.

Goal 9. Promote mobility for people and goods through a balanced system of transportation options.

Goal 10. Improve access to educational opportunities, health care and human services for all Delawareans.

10) Add item: "Promote mobility for people and goods through a balanced system of transportation options." This is covered in Goal 9, see page 8.

Under "Cabinet Committee Policy Statement" (page 8)

11) CCSPI should require (strike "encourage") state agencies to implement state strategies and policies through daily business practices. CCSPI should, by some legal means, also require local governments to adhere to state strategies. The implementation of the State Strategies will be accomplished through a Governor's Executive Order. That order will require agencies to adhere to the State Strategies. The idea that local governments should also be required to adhere to State Strategies will require some legislative action.

Under "Cabinet Committee Policy Statement" (page 9)

12) Revise to read "State Strategies seek to prioritize…" (strike incentivize) This text was revised as follows. OSPC believes it is still important to use incentivize but agree that the addition of prioritize is helpful.

"The State Strategies seek to prioritize and incentivize compact, mixed-use growth, development and redevelopment in Investment Levels 1 and 2."

13) Revise the third paragraph, beginning "The State Strategies seek to discourage to read, "The goal of State Strategies is to discourage sprawling growth…" This is a good suggestion. The text was revised as follows. "A primary goal of State Strategies is to discourage sprawling growth…"

14) Strike "incentivizing: natural resources and revise to read "by strengthening support for…"

"State Strategies Framework and Feedback on Levels" (page 10) We respectfully disagree with this suggested revision. It is important that there are incentives for natural resource protection in Level 4 areas.

15) In the last paragraph, include "reduce the vulnerability of communities to the impacts of climate change." Climate resiliency is covered as one of the 5 framework statements covered under Smart Growth. The document also supports the Climate Action Plan by reference.

Under "Promoting Growth" (page 15)

16) Define "Municipal Annexation Areas." This definition is found in the Data Storymap that accompanies the State Strategies. The definition is as follows: Annexation areas are identified in the comprehensive planning process as areas where municipalities intend to expand their boundaries and provide infrastructure and services to support future growth. These boundaries are adopted as part of the certified comprehensive plan.

17) Shorten distances for access to public transit by 0.25 miles in all cases. The .75 mile buffer area around transit stops was the recommendation of the Delaware Transit Corporation. Our understanding is that this is a standard distance used in transit planning.

Under "Promoting Preservation" (page 15)

18) Increase the sea level rise scenario from 3 to 5 feet. The 3' scenario for Coastal Inundation is the recommendation of the Department of Natural Resources and Environmental Control. They feel this is the appropriate dataset to use for this edition of the State Strategies analysis.

Under "Out of Play" (page 15)

19) Work with Sussex County players to designate 100-year floodplains "Out of Play."

Under "investment Level Profile" (pages 17-21) Areas identified as "Out of Play" must be legally protected through regulation, easement or fee simple purchase. While New Castle and Kent counties have land use regulations that

regulation, easement or fee simple purchase. While New Castle and Kent counties have land use regulations that restrict future development in the 100 year floodplains, Sussex does not. Sussex County must adopt a similar ordinance for these areas to be considered "Out of Play."

20) For Level 1, clarify "urban centers in unincorporated areas." We assume they describe places like Hockessin and Glasgow, unincorporated areas with clusters of commercial and residential development. Because they are not municipalities, and because they appear suburban in character, the term "urban" is misleading. You are correct in your assumption. The use of the term urban comes from the Census designations of urban vs rural. We agree that it may be unintentionally misleading, and we appreciate the suggestion. The profile for Level was revised to say, "Suburban clusters in unincorporated areas."

21) We also recommend revising the description of Level 3 as "projected future growth areas," which could have the unintended result of shifting development pressure from Levels 1 and 2 toward areas that are less suitable for growth. Level 3 should be "reserved" as "future growth areas." The Level 3 areas are described as "transitional areas" in our State Strategies Policy Framework (see Figure 2). This acknowledges that these are expected to be future growth areas. They also tend to be areas within local government comp plan growth areas that may have natural resources and environmental features. Local government comp plans and land use regulations may allow development in these areas in the short, rather than longer term. However, State resources and programs will prioritize Investment Levels 1 and 2 for compact mixed use development. The policy focus of State Strategies is to encourage development, infill and redevelopment in Investment Levels 1 and 2.

Under Maps

For all maps, please indicate major roadways for purposes of visualization. Layers that show commuter rail lines and fixed-route bus routes would also be helpful. The static maps in the State Strategies document do include roads, but they are difficult to see at the statewide and county scale of the maps. The interactive map also contains roads and rail lines, which become much easier to see as you zoom into the maps. Tax parcels are also visible when the maps are zoomed in.

New Castle County (page 23)

22) Please reclassify Level 3 areas nearest the shoreline near New Castle as Level 4. Low-lying areas are critical for coastal resilience. Areas depicted as "Out of Play" in State Strategies must be legally preserved and otherwise protected from development. The 100 year flood plain in New Castle County is "Out of Play" because the county has protective ordinances that limit new development in the floodplain. However, the county does allow development near the coast outside of the floodplain. Also, please see the Ecological Lands of Significance Map added to the State Strategies which more clearly identifies areas with coastal vulnerabilities.

Kent County (page 24)

23) Please reclassify Level 4 areas east of SR1 "Out of Play." Those areas are also critical for resilience. Despite the minimal development, any new development will have an impact on the bordering marshes, which should be allowed to migrate with sea level rise. Work with the county and landowners to ease or otherwise conserve those properties. Areas depicted as "Out of Play" in State Strategies must be legally preserved and otherwise protected from development. The 100 year flood plain in Kent County is "Out of Play" because the county has protective ordinances that limit new development in the floodplain. However, the county does allow some low density development East of Route 1, outside of the floodplain. A careful review of the State Strategies maps does show that a great deal of land preservation activity, shown on the maps as "Out of Play," has occurred East of Route 1 in Kent County. Also, please see the Ecological Lands of Significance Map added to the State Strategies which more clearly identifies areas with coastal vulnerabilities.

Sussex County (page 25)

24) Please redesignate Level 4 areas east of SR1 "Out of Play." As above, those areas are critical for resilience and marsh migration. Areas depicted as "Out of Play" in State Strategies must be legally preserved and otherwise protected from development. Sussex County does allow development to occur East of Route 1, both inside and outside of the floodplain. There are no additional density limitations or environmental protections applied in this area compared with all other areas in Sussex County. Also, please see the Ecological Lands of Significance Map added to the State Strategies which more clearly identifies areas with coastal vulnerabilities.

25) Reclassify Level 3 Investment areas in the Inland Bays Watershed to Level 4 or Out of Play for the reasons above and to preserve water quality and habitat in the inland bays. Areas depicted as "Out of Play" in State Strategies must be legally preserved and otherwise protected from development. Sussex County does allow development to occur near the inland bays, both inside and outside of the floodplain. There are no additional density limitations or

	near the inland bays, both inside and outside of the floodplain. There are no additional density limitations or environmental protections applied in this area compared with all other areas in Sussex County. Also, please see the Ecological Lands of Significance Map added to the State Strategies which more clearly identifies areas with coastal vulnerabilities. 26) Several Level 1 areas overlap with 100-year floodplains. One hundred-year floodplains should not be included in Level 1 and Level 2 designations. Areas in the 100 year floodplain are depicted in their underlying Investment Level unless they are legally protected, as they are in New Castle and Kent counties. Under "Integration with Other State Agency Efforts" (pages 28-29) 27) In the first paragraph, include a statement that individual departments should be required to review their policies and practices to align with State Strategies. This statement or a statement with a similar purpose is more appropriate for the upcoming Executive Order, since the Cabinet Committee serves the Governor. Here is how it was addressed in the 2020 EO. The Governor's Office could always strengthen this language at their discretion. 28) In general, include the Delaware Department of Transportation, the Delaware Emergency Management Agency and the Department of Health and Social Services on the CCSPI to strengthen land-use decisions and improve public health. The DelDOT Secretary is a member of the CCSPI. The Secretary of Safety and Homeland Security is also a member, and DEMA falls under his agency and is represented. The idea of adding the DHSS Secretary will be shared with the Governor's Office for consideration. Under "Policy Recommendations" (pages 30-49) 29) To be more useful to the reader of the document, it would be helpful to also cross-index the policy tables by compiling each department's relevant policies and organizing them by level to show how they align specifically for that area. Thank you for this recommendation. We will explore ways to index the policy recommendations as we implement the Strategies. Under "Agency Recommendations" (page 51) 30) Examine the feasibility of restricting TIIF and Site Readiness Funds in Level 4. Thank you for this suggestion. The purpose of adding this idea on page 51 is to further explore linking the TIIF program to State Strategies implementation.
Action	N/A
Category	Environment/Sustainability/Resiliency
Comment ID	41

Date(s)	10/10/2025
Submitted by	Shauna Thompson
Affiliation	Pemberton Branch Charitable Trust
Comment	Requesting tax parcels 235-27.00-12, 325-27.00-11, and 334-4.00-34 be removed from level 4 based on the surrounding areas growth trends. I am requesting the Office of State Planning (OSP), as part of the 5-year update, review the data used for the above parcels when considering their growth zone. The lands are currently designated as a Level 4 when they meet the criteria to be designated Level 1. They are located on the Route 9 commercial corridor defined by Sussex County Code as the only east/west "Major Arterial Roadway" in eastern Sussex county. They are serviced by public transportation with the year round Delaware Transit Corporation DART bus route from Georgetown to the Lewes Park and Ride which connects to the entire DART bus network. They are served with central public sewer and central public water by Artesian water and wastewater companies. They are adjacent to the Bayhealth Emergency and Urgent Care Center. The nearby area has numerous residential developments and on the opposite side of Route 9 is a commercial corridor of land Zoned C-1, C-2 and CR-1 with a variety of business, commercial, retail, medical and office uses. The designation of the properties as level 4 does not recognize the reality of the area as a growth area surrounded by and serviced by commercial, medical, retail and even educational facilities. For these reasons it makes sense to remove it from level 4.
Response	The process for creating the Strategies for State Policies and Spending investment level designations is a data-driven process. Please refer to our data Story Map link (https://storymaps.arcgis.com/stories/0dade3116eb04ced807086a9260d1262) and the "Collaborative Update Process" in the policy document (https://stateplanning.delaware.gov/strategies/documents/2025-state-strategies-draft.pdf) to learn more. Click on the interactive strategies map explorer (https://experience.arcgis.com/experience/c32893afd06a44b883c6e341a71fc23c) to learn more about the data layers that influence the investment level designation of the property you referenced. We note that the plan amendment that was reviewed as PLUS 2021-12-12 is still pending a decision before Sussex County. Should this amendment be approved by Sussex County and Cabinet Committee on State Planning Issues, we will consider this consistent with the Strategies for State Policies and Spending. These parcels remain in a low density area according to the Sussex County Comprehensive Plan.
Action	N/A
Category	
	Individual Parcel Requests
Comment ID	42

Date(s)	10/10/2025
Submitted by	Richard Reed
Affiliation	Reed Farms
Comment	My family owns approximately 67 acres on the south side of the Milton Ellendale Highway (Rt. 16) and the west side of Gravel Hill Road (Rt. 30) just west of the Town of Milton (SCTP Nos. 235-13.00-29.00, 29.01 and 235-14.00-570.00). Our property is surrounded by major modes of transportation on 3 sides. To the north is Rt. 16, to the east is Rt. 30 and to the South is the Delmarva Central Railroad Company. This makes the property ideal for many uses, including business and industrial uses such as though already existing immediately north (Iron Works) and south (Baker Petroleum and Builders FirstSource) of the property. Both Baker Petroleum and Builders FirstSource use rail spurs coming off the Delmarva Central Railroad Company and we anticipate that our property would do the same. In fact, Delmarva Central Railroad has confirmed to us that it has companies that would be able to use a property like ours with rail access. In addition to being located on two roads classified by DelDOT as “Major Collectors” (Rt. 16 and Rt. 30) with Rt. 30 being classified as a State Truck route, and the rail line, our property has immediate access to both central water and central sewer. Artesian has CPCNs for these utilities and the existing mains for both of these utilities run across our property’s frontage on Rt. 30. Further, Chesapeake Utilities has a natural gas compression station on a parcel surrounded by our property along Rt. 30. With respect to other important factors to consider, Beebe recently opened a medical campus known as the Jerry Ann McLamb Medical Pavilion on Rt. 16 within 0.40 miles of our property. Even with all of these growth factors, the draft SSM shows our property as being located within a Level 4 area. We do not understand how that is possible, particularly when there are areas on the west side of Rt. 30 that are shown as being in an Investment Level 3 just south of Sand Hill Road. These properties that are shown in Level 3 only contain farms and forest. In contrast, the area north of Sandhill Road where our property is located contains a number of business and industrial uses with central water and sewer and is shown as being in a Level 4 area. It is unclear why the SSM would place properties that are only farmed or forested in a Level 3 area while placing properties that are situated on the same road to the north where there is a railroad and active commercial and industrial areas in a Level 4 area. Our family respectfully requests that our properties be changed to a Level 2 or Level 3 designation. We are happy to provide you with any additional information you may need to confirm these characteristics of our property.
Response	The process for creating the Strategies for State Policies and Spending investment level designations is a data-driven process. Please refer to our data Story Map link (https://storymaps.arcgis.com/stories/0dade3116eb04ced807086a9260d1262) and the "Collaborative Update Process" in the policy document (https://stateplanning.delaware.gov/strategies/documents/2025-state-strategies-draft.pdf) to learn more. Click on the interactive strategies map explorer (https://experience.arcgis.com/experience/c32893afd06a44b883c6e341a71fc23c) to learn more about the data layers that influence the investment level designation of the property you referenced. We note that the plan amendment that was reviewed as PLUS 2020-12-05 was denied by the county. These parcels remain in a low density area according to the Sussex County Comprehensive Plan.
Action	N/A
Category	
	Individual Parcel Requests
Comment ID	43

Date(s)	10/10/2025
Submitted by	David Carey
Affiliation	Land owner in Sussex County
Comment	After listening to the Sussex County OSP Workshop data discussion on Tuesday, September 30, 2025, and speaking with you and Dorothy, I was left with the question of why do some of the properties that have many of the most important components necessary to be developed, somehow not have the data attributed to them to support it? Due to this question, I am requesting that data be reviewed, and the property removed from level 4 based upon the data and the surrounding areas significant growth trends. Thank you for considering my request to review the data and remove tax parcel 235-37.00 13.00 from level 4 based upon the information in my letter. I can be reached at 302-645-1849 or 207-650-8881 ©, if you have any questions and need more information.
Response	The process for creating the Strategies for State Policies and Spending investment level designations is a data-driven process. Please refer to our data Story Map link (https://storymaps.arcgis.com/stories/0dade3116eb04ced807086a9260d1262) and the "Collaborative Update Process" in the policy document (https://stateplanning.delaware.gov/strategies/documents/2025-state-strategies-draft.pdf) to learn more. Click on the interactive strategies map explorer (https://experience.arcgis.com/experience/c32893afd06a44b883c6e341a71fc23c) to learn more about the data layers that influence the investment level designation of the property you referenced.
Action	N/A
Category	
	Individual Parcel Requests
Comment ID	44

Date(s)	10/10/2025
Submitted by	Eul Lee
Affiliation	Sussex County
Comment	Growth Areas Concept Must be Revisited What does 'Growth' mean? Slow and organic expansion that is noticeable, or an exponential expansion that our eyes cannot keep up with? Growth Areas must be capacity controlled – traffic, drinking water source, first responders, schools, etc. We have witnessed the lament of uncontrolled growth in many towns and counties across the country, including Sussex County. We must study the capacity of major resources and infrastructure and then decide whether the area can handle more development. For example, if Rt 24 is almost maxed out with 20,000 vehicle trips per day and 3,000 during peak hours, we cannot add 6,000 daily vehicle trips for Belle Mead or 26,000 for Atlantic Fields. In the case of drinking water sources, Rehoboth Beach's water restriction in the summer is still fresh in our memory. Tidewater Utilities' 2022 Annual Water Quality Report states that Rehoboth/Lewes Pump District was interconnected with Angola Pump District as of 6/14/2022. It also shows on page 33 that Rehoboth District's susceptibility for all tested contaminants as either Exceed, High or Very High. (Royal Farms at Seaside Outlet is sitting on top of a huge Wellhead Protection Area.) Was the Rehoboth water source getting constrained and needed water from elsewhere? Will it eventually affect Angola's water supplies, too? I raised these questions in the past, but no one paid attention. Lewes' Wellhead Protection Area was moved inland years ago due to saltwater intrusion. Doesn't it make sense that the over-pumping of underground water near the ocean creates the vacuum that pulls in saltwater? Truly, what is the water capacity of the so-called Growth Areas? Can residents be assured that their children and grandchildren would not have to scramble for water? Another big problem with the idea of directing all new developments to Growth Areas is that it exacerbates the affordable housing crisis! Just decentralize job/economic centers and spread them around town centers where the state intends to invest. This will bring much-needed economic boosts to western Sussex where employees can find affordable housing. Do I mean indiscriminate spreading of any commercial or business developments in the rural areas? NO! The farmlands and recreational spaces must be preselected and preserved by compensating landowners fairly. I do not understand why the Council members from the western Sussex are not actively pursuing the economic opportunities for their constituents as an integral part of their jobs. Spreading the likes of Atlantic Fields and Belle Meade away from Coastal Hwy will help in many ways the county as a whole! Furthermore, it will be in line with DelDOT's long-time effort to route the beach traffic between Milford and Bethany Beach through Rt 113, away from Coastal Hwy. Please give Growth Areas another thought.
Response	Thank you for your comments. The issues that you raise are best addressed at the local level during the comprehensive planning and land development processes. It is important to carefully consider infrastructure capacities such as water resources and wastewater during the development of comprehensive plans.
Action	N/A
Category	
	Other
Comment ID	45

Date(s)	10/10/2025
Submitted by	Heather Lewis
Affiliation	Horsey Companies
Comment	I'm sending this email on behalf of Bobby Horsey- cc'd here. Bobby Horsey (Robert E Horsey) is managing member of Double H Properties LLC who is property owner on Providence Church Road. I have been reviewing our family's properties throughout the state and how they were being classified on the 2025 draft State Strategies Map. One of our properties stood out in particular which is our property on the west side of Providence Church Road just west of Delmar on Rt. 54. I'm sure that you have received many comments so I attached some screenshots of the 2025 draft SSM to help quickly orient you to the area. The first screenshot shows this area with my family's properties generally identified with a red circle. What concerned me about the property on the west side of Providence Church Road was that it is shown as being in a Level 4 area. I am questioning the designation for this property and the ones that surround it because they have been zoned GR (General Residential) in Sussex County for decades. As you likely know, the GR (General Residential) District has a higher base density than the County's AR (Agricultural Residential) District. In fact, the base density is twice as high for GR (10K sq. ft./lot) than it is for AR (20K sq. ft./lot)(AR is 20K sq. ft./lot for properties like this with central sewer). I then looked at the draft SSM and clicked on the properties and saw that the data present for our property on the east side were 3 Growth items: CPCN, County Growth Area and Fire Stations (second screenshot). I then compared the east side property to the property on the west side of Providence Church Road (3rd screenshot) which listed Preservation factors of "Non Growth Area" and "Ag Forest Importance." I was surprised with these descriptions for a couple of reasons. First, it states that the property is not within a Growth Area of Sussex County. I double checked the County's Comprehensive Plan to confirm that it is within one of the County's Growth Areas. The property is in the County's "Existing Development" area which is identified by Sussex County as being a Growth Area. In addition, this property has CPCNs for both central water and central sewer just as our families other properties that are zoned AR-1 on the east side of Providence Church Road. All of these properties are in the same area with the only separation being Providence Church Road which is a primary corridor into Salisbury—the largest City on the Eastern Shore. On behalf of our family, I am writing to request that your office reconsider the properties within the County's Existing Development Growth Area on the western side of Providence Church Road, particularly those that have CPCNs for sewer and water services. We are specifically requesting that our property be considered as being within a Level 3 area based upon its characteristics. I would be happy to discuss this further with you or share any additional information that you may need to confirm these features for this property.
Response	The process for creating the Strategies for State Policies and Spending investment level designations is a data-driven process. Please refer to our data Story Map link (https://storymaps.arcgis.com/stories/0dade3116eb04ced807086a9260d1262) and the "Collaborative Update Process" in the policy document (https://stateplanning.delaware.gov/strategies/documents/2025-state-strategies-draft.pdf) to learn more. Click on the interactive strategies map explorer (https://experience.arcgis.com/experience/c32893afd06a44b883c6e341a71fc23c) to learn more about the data layers that influence the investment level designation of the property you referenced.
Action	N/A
Category	
	Individual Parcel Requests
Comment ID	46

Date(s)	10/10/2025
Submitted by	Emily Knearl
Affiliation	TNC
Comment	Overarching Feedback 1. Climate Resiliency and Housing Balance The Nature Conservancy (TNC) commends OSPC's recognition of climate resiliency as a key factor in guiding future state investment decisions, while also addressing Delaware's critical affordable housing needs. This balanced approach is essential to ensuring that growth occurs in safe, sustainable areas. We are concerned by perspectives suggesting that land conservation and affordable housing are competing priorities. These goals can and should be complementary. We appreciate the plan's recognition of the importance of redevelopment and recommend that it also call for an evaluation of Delaware's density regulations to encourage more compact, sustainable growth patterns. A critical next step would be to reduce regulatory and legal barriers to building in already developed areas as well as exploring incentives to build more affordable housing and offer greater housing stock variety. 2. Use of Climate Forecasting Data TNC is encouraged to see that the updated mapping incorporates data layers that forecast future climate scenarios. Including forward-looking climate data is a vital step toward ensuring that state investments reflect evolving risks and help build community resilience. We also appreciate the inclusion of statements indicating that public infrastructure should not be planned in Level 4 areas. However, we recommend clarifying what accountability measures will ensure that this principle is applied consistently across agencies and jurisdictions. 3. Reliance on Outdated FEMA Flood Maps We note that the current Strategies rely on FEMA Flood Insurance Rate Maps (FIRMs) from 2015, which no longer reflect current flood risks or projected sea-level rise. Because the State Strategies will guide investments through 2030, these maps will be 15 years old by the end of the planning horizon. While we recognize that FEMA maps are federal products outside of the state's direct control, the Strategies should explicitly acknowledge these limitations and incorporate supplemental state-level or regional data to better represent present and future risks. We are also concerned about inconsistencies across counties. In particular, Sussex County's policies allowing construction in flood-prone areas create long-term risk for residents and taxpayers and appreciate NCC and Kent Counties already taking this step. TNC encourages the State Strategies to stimulate further dialogue and alignment among counties to ensure consistent, risk-informed planning statewide. 4. Comprehensive Plans and SB 237 TNC appreciates the attention given to implementing the new comprehensive planning requirements in Senate Bill 237 and OSPC's proactive response. We recommend establishing a modest, annual grant program through which local governments can apply for support in meeting the bill's new climate-planning requirements. Several local jurisdictions have not yet incorporated climate planning into their comprehensive plans due to limited capacity and the technical nature of the work. Providing targeted financial assistance would help ensure these plans meet state expectations and strengthen resilience across Delaware. Delaware must make space for water. Steering new development away from areas projected to be inundated under DNREC's sea-level-rise scenarios is essential to safeguarding communities and investments. 5. Infrastructure Investment in High-Risk Areas If the State Strategies are intended to guide state infrastructure and investment decisions, the mapping should clearly indicate that new state investments will not be prioritized in high-risk, flood-prone areas. Several Level 1 areas in Sussex County overlap with 100-year floodplains. TNC recommends that 100-year floodplains be deemed ineligible for Level 1 and Level 2 designations, consistent with practices in New Castle and Kent Counties, where such areas are considered "Out-of-Play." Alternatively, the existing designations could be maintained for already developed areas, with a clear statement that the state's policy is not to increase density or make new infrastructure investments in these locations. Specific Feedback by Page Number A. Goals (page 8) We suggest adding an additional goal: "12) Increase Delaware's adaptive capacity and resilience to current and projected climate change impacts." By including this goal, the State Strategies would acknowledge in its framework

	the growing risks associated with sea-level rise, flooding, extreme heat, and other climate-driven hazards, and emphasize the need for proactive adaptation measures. B. State Strategies Framework and Feedback on Levels (page 10) Feedback on Levels 1–3 We appreciate the inclusion of climate resiliency within the framework and suggest that the final graphic explicitly include the phrase "reduce the vulnerability of communities to the impacts of climate change." We also recommend revisiting the description of Level 3 areas as "projected future growth areas." This framing could inadvertently shift development pressure from Levels 1 and 2 toward areas that are less suitable for growth. We suggest reconsidering this characterization to avoid incentivizing expansion into higher-risk or less sustainable locations. In addition, the Delaware Land Protection Coalition's Conservation Blueprint maps identifies high-value habitats and open spaces within Levels 1, 2, and 3. We recognize that the intent of the OSPC framework is not to imply an absence of natural resources in these areas, but encourage clarifying language to prevent this misperception and review of these blueprint maps. Feedback on Level 4 Designation Enhancements We recommend adding "climate-vulnerable areas" to the Level 4 designation description. This would reinforce that these areas are not appropriate for new development or infrastructure investments and should instead be prioritized for conservation, restoration, or strategic migration (retreat). C. Out-of-Play Areas (page 21) TNC appreciates the inclusion and clear definition of "Out-of-Play" areas. The accompanying maps with the gray areas are particularly helpful and enhance transparency. D. Integration of Marsh Migration Data (page 28) We recommend integrating the recently released DNREC Marsh Migration Model into the State Strategies analysis. Comparing these data with coastal inundation and tidal wetland buffer layers could help identify suitable and highly suitable marsh migration corridors that should be incorporated into the Investment Level framework. Protecting these areas is critical to maintaining tidal wetland function, coastal resilience, and flood protection. Without space for inland migration, Delaware's tidal wetlands—and the natural defenses they provide—could be lost. E. Policy Table (pages 30–49) The policy table is detailed and thoughtful. We encourage the addition of clear implementation and accountability mechanisms to ensure follow-through. It would be helpful to clarify whether these actions were proposed by the respective state agencies and how progress will be tracked over time. F. Near-Term Efforts (page 50) TNC appreciates the inclusion of several of the near-term actions, particularly bullets 2, 3, and 5. For bullets #2, we encourage the establishment of clear mechanisms to ensure that state agencies and local governments adhere to the State Strategies. For example, given OSPC's placement within the Office of Management and Budget, we recommend adding language such as: "To encourage greater integration of the State Strategies, OSPC should review the proposed state budget using the State Strategies and Investment Levels 1–4 as a framework to identify any state agency funding requests that are inconsistent with this framework." We also appreciate bullet #3 and the pilot process that automatically refers projects conflicting with the State Strategies to the Cabinet Council. We recommend strengthening this language to read: "Explore strategies to grant the Cabinet Council greater authority to enforce consistency across state agencies and to withhold state funding for projects that conflict with the State Strategies, when appropriate and consistent with the adopted FY Budget. G. Agency Recommendations (page 51) Finally, we appreciate the State Strategies' recognition of Delaware's increasing exposure to climate risk. The State of Delaware faces significant and accelerating climate threats, and proactive planning is essential. There is both a practical and ethical responsibility to direct growth and investment away from areas of known hazard and toward resilient, sustainable communities.

Response	1) There are currently efforts underway to reduce regulatory barriers to increase housing density and encourage affordability. These include a zoning reform pilot program (SJR8). Efforts to improve permit efficiency for affordable housing (EO4) and ongoing efforts to implement the findings of the recently concluded Affordable Housing Taskforce. The state strategies provides the policy framework for implementing affordable housing in compact mixed-use environments throughout the state. See the policy framework in figure 2. 2) Climate projections will be included in the update of the Climate Action Plan, which DNREC is working on concurrently with this State Strategies update. Future State Strategies will include relevant data and policy information in coordination with the Climate Action Plan. 3) The 2025 State Strategies Investment Maps utilize the Flood Risk Adaptation Model (FRAM) which has been identified from our agency partners at DNREC to be the most updated version of this dataset available. 4) Thank you for your comment. We will consider this as we implement SB 237. 5) See the new Ecological Lands of Significance map in the Strategies Insights section of the policy document. This map makes it easier to see critical environmental resources in relation to the Investment Levels. The real opportunity is in the implementation of the 2025 State Strategies. Once they are adopted, the Cabinet Committee can work with local government partners to evaluate and amend policies. Currently, OSPC is unable to designate 100-year floodplains in Sussex County as Out-of-Play because Sussex County does not protect those areas in the same way as New Castle and Kent Counties. A) The State Strategies goals are set by the Cabinet Committee on State Planning Issues (CCSPI). There are currently no proposals to change any of the goals being considered by the CCSPI. However, the policy document specifically mentions a commitment to the Climate Action Plan in the section “Integration with Other State Agency Efforts.” Goal number 11 represents the CCSPI’s commitment to coordinate all planning work and that includes a commitment to the Climate Action Plan goals and strategies. B) Thank you for the suggestions. The framework chart and the Investment Level profile for Level 4 were not changed. These elements of the document are meant to be high-level and set the stage for implementation. The suggestions will be shared with the CCSPI to use in decision-making going forward. The Level 3 description was not changed. For many communities, development pressure is accelerating long-term growth plans and is effectively making these areas transitionary in nature. Statewide housing production goals will only increase these demands. This highlights the importance of near-term planning for Level 3 areas. C) Thank you for the comment. D) Thank you for the data suggestion. It is too late in the development process to add additional data layers to the Strategies analysis. However, OSPC and the CCSPI will retain this suggestion for future enhancements to the Strategies analysis process and could be reflected in future data releases. E) The policy tables document existing agency Strategies implementation policies. Specific tracking of agency efforts is more appropriate during the implementation phase of the 2025 Strategies. This suggestion will be shared with the CCSPI. F) Like response “E” above, this suggestion will be shared with the CCSPI and considered during the implementation phase of the 2025 Strategies. The near-term efforts are a starting point, and the specific scope of each effort will be defined as work begins. G) Climate risk and eviromental challenges are an important factor in all land use practices and decisions.
Action	N/A
Category	Environment/Sustainability/Resiliency
Comment ID	47

Date(s)	10/10/2025
Submitted by	Mark Nardone
Affiliation	Delaware Nature Society
Comment	1) Under goals, please consider adding: “Promote the health and general well-being of all Delawareans by providing opportunity for increased to physical activity in their neighborhoods and access to public open space for outdoor recreation.” 2) Under goals, please consider adding: “Increase Delaware’s adaptive capacity and resilience to current and projected climate change impacts” to acknowledge the growing risks associated with sea-level rise, flooding, extreme heat, and other climate-driven hazards, and to emphasize the need for proactive adaptation measures. 3) We recommend revising the description of Level 3 as “projected future growth areas,” which could have the unintended result of shifting development pressure from Levels 1 and 2 toward areas that are less suitable for growth. Level 3 should be “reserved” as “future growth areas.” 4) Mapping should clearly indicate that new state investments will not be prioritized in high-risk, flood-prone areas. 5) Under goals, please consider adding: “Increase Delaware’s adaptive capacity and resilience to current and projected climate change impacts” to acknowledge the growing risks associated with sea-level rise, flooding, extreme heat, and other climate-driven hazards, and to emphasize the need for proactive adaptation measures. 6) Please work with Sussex County players to designate 100-year floodplains “Out of Play.” Under Maps 7) Please reclassify Level 3 areas nearest the shoreline near New Castle as Level 4. Low-lying areas are critical for coastal resilience. 8) Please reclassify Level 4 areas east of SR1 in Kent County “Out of Play.” Those areas are also critical for resilience. Despite the minimal development, any new development will have an impact on the bordering marshes, which should be allowed to migrate with sea level rise. Work with the county and landowners to ease or otherwise conserve those properties. 9) Please redesignate Level 4 areas east of SR1 in Sussex County “Out of Play.” As above, those areas are critical for resilience and marsh migration. 10) Reclassify Level 3 Investment areas in the Inland Bays Watershed to Level 4 or Out of Play for the reasons above and to preserve water quality and habitat in the inland bays. 11) Several Level 1 areas overlap with 100-year floodplains. One hundred-year floodplains should not be included in Level 1 and Level 2 designations. 12) Across the state, please reexamine 100-year floodplains across all levels. They do exist in levels 1, 2 and 3. The areas are critical for resiliency. Further development would be at risk.

Response	1) Thank you for your comment. This is not one of the 11 goals identified by the Cabinet Committee on State Planning Issues. However, please see the state strategies policy framework as summarized by figure 2 in the document. Investment levels 1 and 2 promote compact mixed-use development with access to pedestrian, bicycle networks, and open spaces for recreation. These factors will promote a healthy lifestyle. 2) Thank you for your comment. This is not one of the 11 goals identified by the Cabinet Committee on State Planning Issues. However, please see the state strategies policy framework as summarized by figure 2 in the document. Climate resiliency is addressed in the policy framework. 3) Please review the policy framework in figure 2, which describes level 3 as transitional areas where future growth is predicted but natural resources and conservation remain crucial. See also the investment level profile for level 3. Please be aware that the state government cannot reserve land for future growth, that is the responsibility of the local government through their comprehensive plans. 4) Coastal inundation and the FRAM data which reflect flooding and coastal resiliency concerns are a part of the data analysis that leads to the strategies level designations. We acknowledge that there are towns and built areas that are going to be affected by coastal hazards that are designated as investment levels 1 and 2 because of existing population and infrastructure in those areas. In order to more clearly demonstrate parts of the state that are going to be impacted by coastal hazards we have developed an environmental overlay layer that will visibly include the coastal inundation, flood hazard areas, and ecological connectivity to our mapping series. 5) This is not one of the 11 goals identified by the Cabinet Committee on State Planning Issues. We have referenced the DNREC climate action plan and will implement climate resiliency strategies in concert with our partners at DNREC. 6-11) Out of Play layers have to be backed up by a legal or regulatory restriction. We appreciate your comments regarding these important natural resource features, however none of these areas have those legal or regulatory restrictions so they cannot be placed in Out of Play. 12) Thank you for your comment.
Action	N/A
Category	Environment/Sustainability/Resiliency
	Data Change Requests
Comment ID	48

Date(s)	10/10/2025
Submitted by	Joseph Pika
Affiliation	Sussex Preservation Coalition
Comment	1) It is inappropriate for any lands subject to severe flooding, particularly land subject to sea level rise, to be designated Level 1 or 2 Growth Areas. The state needs to be developing robust policies about how to minimize exposure to systemic flooding threats, not misdirecting investment into these areas. 2) All areas subject to 100-year floods should be Out of Play. This should be a statewide policy that applies to all counties equally. That is not currently the case. 3) Level 3 remains an unclear designation. In the eyes of some, it is an area preparing for growth. In the eyes of others, it is an area where growth encroaches upon areas that deserve protection. While the interpretation will depend heavily on local circumstances and local policies, the inherent lack of clarity is problematic. Is the state encouraging future growth or seeking to slow it? 4) Areas immediately adjacent to Growth Areas are in jeopardy in this state. For example, Agricultural-Residential (AR-1) areas on U.S. 9 in Sussex County that remain Level 4 but which are close to Level 3 areas are under heavy pressure to develop without adequate infrastructure either in place or planned. It is critical that OSPC and CCSPI remain true to their commitment to develop state investment policies BASED ON DATA NOT POLITICAL PRESSURE. All land use authorities in the state should have access to data based on objective indicators as they address pressures for development. To be specific, the future of Cool Spring Crossing should be guided by objective data, not political pressure. Only in this way will the public have confidence in the resulting decisions. 5) Transportation is a critical factor in land use decisions but this significance is not fully captured in the State Strategies. A solution is vital, but we do not have one to suggest. 6) Are sewer networks fully captured in the maps and data layers? It is not clear to us that the Public Service Commission's work is fully incorporated. Is that Commission subject to state policies as are other departments and agencies? 7) It is not only the PSC that sometimes fails to align with state strategies. In its zeal to advance the goal of Affordable Housing, the DSHA has stretched its definition of "Areas of Opportunity" in such a way that the data used for the 2025 Draft of the State Strategies is not consistent with its stated position on Cool Spring Crossing. To be effective, the state needs to speak with one voice, not with separate ones. It should be the clear policy of the state that Affordable Housing should not be built in Level 4 areas where necessary infrastructure supports are not in place. 8) SPC does not agree with the criticisms leveled by Sussex County officials, most recently at the Sussex County Council meeting of Wednesday October 8, 2025, that the methodologies used to develop state strategies double-count environmental factors. We believe the environmental measures are separable and do not result in undue emphasis placed on environmental considerations. We do not hear the same complaint about growth-related indicators and are confident that many of them rely on partially duplicated data. 9) Another misguided criticism from Sussex government concentrates on the maps being "backward" not "forward" looking. The poster child for this criticism is the hospital in Millsboro that is under construction but not yet in operation. We note the obvious: not all construction projects are completed and it would be premature to assume they will be. Is there a means by which adjustments are made in state strategies and maps between five-year updates? If the hospital comes fully on-line and provides vital services, will there be a way to incorporate that information? Does OSPC maintain a list of such situations for each of the 60 public entities making land decisions in the state? 10) Have the most up-to-date flood projections been used to complete the maps and strategies? We have heard several authorities pose this question and urge that the most current data be utilized. 11) The +1/-1 methodology sometimes seems counterproductive. Should a library have the same infrastructure value as a hospital? Perhaps consider utilizing a scale which recognizes that some factors deserve more weight than others, even if the range is narrow, for example +3/-3 or even +2/-2. Such a scale could be developed based on feedback from land use officials from throughout the state.

Response	1) First, coastal inundation and the FRAM data which reflect flooding and coastal resiliency concerns are a part of the data analysis that leads to the strategies level designations. We acknowledge that there are towns and built areas that are going to be affected by coastal hazards that are designated as investment levels 1 and 2 because of existing population and infrastructure in those areas. In order to more clearly demonstrate parts of the state that are going to be impacted by coastal hazards we have developed an environmental overlay layer that will visibly include the coastal inundation, flood hazard areas, and ecological connectivity to our mapping series. 2) Out of Play layers have to be backed up by a legal or regulatory restriction. Sussex County floodplains are not legally restricted from development, as they are in the other two counties. 3) Thank you for your comment. Please refer to Level 3 description in the policy document. 4) We note that the plan amendment that was reviewed as PLUS 2021-12-12 is still pending a decision before Sussex County. Should this amendment be approved by Sussex County and Cabinet Committee on State Planning Issues, we will consider this consistent with the Strategies for State Policies and Spending. 5) Our data analysis includes relevant data provided to us by DelDOT and their partners DTC including transit network, transportation improvement districts, bicycle and pedestrian connectivity, and transit areas. It is important to note that DelDOT capital transportation projects have a wide variety of purposes, including capacity, safety, and regional transportation movements, and not all of them are promoting growth. DelDOT is working on some new planning efforts that may result in additional transportation data becoming available in the future. 6) Private water and wastewater infrastructure outside of growth areas, as identified in local government comprehensive plans, is not included in the analysis. Private wastewater service outside of growth zones encourages and enables rural sprawl, which is contrary to the purpose of the State Strategies to promote compact, mixed use development in areas identified for growth by local governments. At the request of Sussex County, the OSPC has engaged with Artesian Water Company Incorporated. Artesian has discussed and described their wastewater transmission and treatment infrastructure in Sussex County. Collaborative discussions are continuing but at this point, no data has been shared due to concerns about security and proprietary business information. With that said, this wastewater transmission and treatment system is critical to future growth and development of Sussex County and needs to be carefully considered as Sussex County updates its comprehensive plan. 7) Thank you for your comment. 8) Regarding the DEN Layer, the resource agencies consider this to be a critical GIS dataset that identifies ecological connectivity and a wide variety of natural resources. It remains in the data analysis. OSPC has run further analysis to ensure the data more accurately reflects current land use conditions. The analysis removed areas appearing in 2022 Land Use Land Cover that depict "Built Lands" from the DEN. The final strategies maps will utilize this new layer. Developing the State Strategies map is a coordinated, data-driven process involving more than 40 datasets. To compile the map and create the investment level geographies, each dataset is assigned a value based on its classification as “promoting growth”, “promoting preservation” and “out of play”. Datasets considered to promote growth are processed to a statewide polygon and assigned a value of “+1” for their respective Area of Interest (AOI) while datasets that promote preservation are processed to a statewide polygon and assigned a value of “-1” for their respective AOI, and finally datasets that are out of play will supersede any other overlapping datasets in the analysis. While it is true that there are areas of overlap in the data for areas promoting preservation it is just as true that there are areas of overlap promoting growth. Many times, hospitals, EMS facilities and fire stations overlap one another in addition to adding elements that would also seek to reenforce the growth zones that local jurisdictions have outlined in their thorough efforts to generate and update their comp plans. 9) Our policy is to do updates every five years. OSPC keeps track of all comprehensive plans and plan amendments that occur in between update cycles and these are all included in the next update. 10) To our knowledge, we have the most up to date flood mapping products from our partners at DNREC. 11) Thank you for your comment. Please see the above comment in #8 relating to the data methodology.
Action	N/A
Category	Environment/Sustainability/Resiliency
	Data Change Requests
	Private Sewer
	Other
Comment ID	49

Date(s)	10/10/2025
Submitted by	Glenn Mandalas
Affiliation	Brockstedt Mandalas Federico
Comment	I represent Charles David Carey III, and Log Cabin Hill, LLC, the owner of SCTMP 235-27.00-13.00 (the Carey Property). For the well-stated reasons in Mr. Carey's October 10, 2025 correspondence (attached), we respectfully request that the Carey Property be removed from Level 4 and reclassified to a Level more consistent with the development trends in the vicinity of the Property and more consistent with the infrastructure existing at the Property. As you are aware, the Carey Property is part of the Cool Spring Crossing development proposal. On July 2, 2025 the Sussex County Planning & Zoning Commission- the Commission charged with land use decisions in unincorporated Sussex County-recommended approval of the Cool Spring Crossing development. Community leader Dr. David Tam, president and CEO of Beebe Healthcare, urged the county to approve Cool Spring Crossing at the hearing leading up to the Planning & Zoning Commission's recommendation. Dr. Tam observed that more housing options are needed by the healthcare provider as it expands to meet demands from a growing population. This inconsistency between the County and its community leaders on the one hand, and OSPC on the other hand, as evidenced by the Carey Property being in Level 4, can easily be reconciled and should be. Please give strong consideration to removing the Carey Property from Level 4 during OSPC's five year review.
Response	The process for creating the Strategies for State Policies and Spending investment level designations is a data-driven process. Please refer to our data Story Map link (https://storymaps.arcgis.com/stories/0dade3116eb04ced807086a9260d1262) and the "Collaborative Update Process" in the policy document (https://stateplanning.delaware.gov/strategies/documents/2025-state-strategies-draft.pdf) to learn more. Click on the interactive strategies map explorer (https://experience.arcgis.com/experience/c32893afd06a44b883c6e341a71fc23c) to learn more about the data layers that influence the investment level designation of the property you referenced. We note that the plan amendment that was reviewed as PLUS 2021-12-12 is still pending a decision before Sussex County. Should this amendment be approved by Sussex County and Cabinet Committee on State Planning Issues, we will consider this consistent with the Strategies for State Policies and Spending.
Action	N/A
Category	
	Individual Parcel Requests
Comment ID	50

Date(s)	10/10/2025
Submitted by	Dallas A Wingate
Affiliation	None
Comment	I am a resident of cool spring area for most of my life of 64 years. I have certainly seen many changes in the population and development. It seems like the growth is already out of control where I live. Vehicle accidents are routine. I recently read somewhere the developers seriously tried to tell us the traffic would actually decrease because the new residents would not have any need to leave. That is simply insultingly stupid. Don't fall for it. I beg you to retain the cool spring area at level 4. We are simply too close to Route 1 and have nowhere near the infrastructure required. I would also welcome a referendum before any new changes are proposed and voted on. I am certain the developers will simply move on to another location where locals would actually welcome them. The strategy must include preserving open spaces first, not last. Let the builders go elsewhere. We simply can't build our infrastructure fast enough.
Response	The process for creating the Strategies for State Policies and Spending investment level designations is a data-driven process. Please refer to our data Story Map link (https://storymaps.arcgis.com/stories/0dade3116eb04ced807086a9260d1262) and the "Collaborative Update Process" in the policy document (https://stateplanning.delaware.gov/strategies/documents/2025-state-strategies-draft.pdf) to learn more. Click on the interactive strategies map explorer (https://experience.arcgis.com/experience/c32893afd06a44b883c6e341a71fc23c) to learn more about the data layers that influence the investment level designation of the property you referenced. We note that the plan amendment that was reviewed as PLUS 2021-12-12 is still pending a decision before Sussex County. Should this amendment be approved by Sussex County and Cabinet Committee on State Planning Issues, we will consider this consistent with the Strategies for State Policies and Spending.
Action	N/A
Category	
	Individual Parcel Requests
Comment ID	51

Date(s)	10/10/2025
Submitted by	DeAnna Poling
Affiliation	Resident
Comment	The area around Cool Springs off Rte 9 should not be lower than a 4 due to traffic congestion.
Response	The process for creating the Strategies for State Policies and Spending investment level designations is a data-driven process. Please refer to our data Story Map link (https://storymaps.arcgis.com/stories/0dade3116eb04ced807086a9260d1262) and the "Collaborative Update Process" in the policy document (https://stateplanning.delaware.gov/strategies/documents/2025-state-strategies-draft.pdf) to learn more. Click on the interactive strategies map explorer (https://experience.arcgis.com/experience/c32893afd06a44b883c6e341a71fc23c) to learn more about the data layers that influence the investment level designation of the property you referenced. We note that the plan amendment that was reviewed as PLUS 2021-12-12 is still pending a decision before Sussex County. Should this amendment be approved by Sussex County and Cabinet Committee on State Planning Issues, we will consider this consistent with the Strategies for State Policies and Spending.
Action	N/A
Category	
	Individual Parcel Requests
Comment ID	52

Date(s)	10/10/2025
Submitted by	Johannes Sayre
Affiliation	Resident of Lewes
Comment	The developers of the Cool Spring Crossing project led their argumentation before Sussex County Planning and Zoning Commission by claiming that the area where Cool Spring is to be built is "no longer rural". Yet the US census classifies the area as not urban based on population density. The Route 9 corridor is still a rural connector with sparse developments and businesses along the road and undeveloped land behind those. It is troubling enough that the open field between Sussex Consortium (PID 235-27.00-20.01) and the Cool Spring parcels has been moved from L3 to L2. The state should not cater to the business interests of the Cool Spring developers and current parcel owners and support their self-serving fraud that the area is already urbanized by moving their parcels from L4. Business interests in maximizing profit are subordinate to the public's interest in maintaining rural areas in Sussex and keeping infrastructure viable and its costs affordable.
Response	The process for creating the Strategies for State Policies and Spending investment level designations is a data-driven process. Please refer to our data Story Map link (https://storymaps.arcgis.com/stories/0dade3116eb04ced807086a9260d1262) and the "Collaborative Update Process" in the policy document (https://stateplanning.delaware.gov/strategies/documents/2025-state-strategies-draft.pdf) to learn more. Click on the interactive strategies map explorer (https://experience.arcgis.com/experience/c32893afd06a44b883c6e341a71fc23c) to learn more about the data layers that influence the investment level designation of the property you referenced. We note that the plan amendment that was reviewed as PLUS 2021-12-12 is still pending a decision before Sussex County. Should this amendment be approved by Sussex County and Cabinet Committee on State Planning Issues, we will consider this consistent with the Strategies for State Policies and Spending.
Action	N/A
Category	
	Individual Parcel Requests
Comment ID	53

Date(s)	10/11/2025 (After Deadline)
Submitted by	Walter M Urban, Jr.
Affiliation	Resident Lewes, DE
Comment	The vicinity of Cool Spring located outside the Coastal Area on U.S. 9 should remain as Level 4 . The Office of State Planning Coordination has objected to each of the four plans this developer has submitted since 2021--they do not support development in Level 4. --If re designating the Cool Spring land from Level 4 to something else were critical, the county had the opportunity to make that request in 2023/24 when it could have requested a change in the Comprehensive Plan. Counties have the opportunity after 5 years to reexamine their Comprehensive Plans. Sussex declined the opportunity to do so, arguing that everything was fine. --Sussex should no longer make decisions with far-reaching consequences in a piecemeal manner. Those arguing that the Level 4 designation should change simply want to perpetuate the case by case, uncoordinated, non-comprehensive style of decision making that Sussex has followed for decades.
Response	The process for creating the Strategies for State Policies and Spending investment level designations is a data-driven process. Please refer to our data Story Map link (https://storymaps.arcgis.com/stories/0dade3116eb04ced807086a9260d1262) and the "Collaborative Update Process" in the policy document (https://stateplanning.delaware.gov/strategies/documents/2025-state-strategies-draft.pdf) to learn more. Click on the interactive strategies map explorer (https://experience.arcgis.com/experience/c32893afd06a44b883c6e341a71fc23c) to learn more about the data layers that influence the investment level designation of the property you referenced. We note that the plan amendment that was reviewed as PLUS 2021-12-12 is still pending a decision before Sussex County. Should this amendment be approved by Sussex County and Cabinet Committee on State Planning Issues, we will consider this consistent with the Strategies for State Policies and Spending.
Action	None
Category	
	Individual Parcel Requests
Comment ID	54