



STATE OF DELAWARE  
EXECUTIVE DEPARTMENT  
OFFICE OF  
STATE PLANNING COORDINATION

March 15, 2005

Mr. Kenneth R. Christenbury, P.E.  
River Basin Engineering  
17585 Nassau Commons Blvd., Ste. 3  
Lewes, DE 19958

RE: PLUS review – PLUS 2005-02-08; Lands of the Dagsboro Church of God

Dear Mr. Christenbury:

Thank you for meeting with State agency planners on February 23, 2005 to discuss the proposed plans for the Lands of the Dagsboro Church of God located on US 113 at Route 26.

According to the information received, you are seeking a rezoning from HC and AR-1 to HC, HR, and R. Specifically, this project is to maintain the church, school and athletic fields and add retail office space, elderly apartments, and townhomes. It should also be noted that you are seeking annexation into the Town of Dagsboro.

Please note that changes to the plan, other than those suggested in this letter, could result in additional comments from the State. Additionally, these comments reflect only issues that are the responsibility of the agencies represented at the meeting. The developers will also need to comply with any Federal, State and local regulations regarding this property. We also note that, if annexed, the Town of Dagsboro will be the governing authority over this land, and the developers will need to comply with any and all regulations/restrictions set forth by the County.

**Executive Summary**

The following section includes some site specific highlights from the agency comments found in this letter. This summary is provided for your convenience and reference. The full text of this letter represents the official state response to this project. *Our office*

*notes that the applicants are responsible for reading and responding to this letter and all comments contained within it in their entirety.*

### **State Strategies/Project Location**

- This proposal is located in an Investment Level 2 area according to the Strategies for State Policies and Spending and that it is proposed for annexation into the Town of Dagsboro. State policies support growth in Investment Level 2 areas.

### **Project Design**

- The project should be redesigned to incorporate principles of “traditional neighborhood design”, providing for a more seamless transition among the uses and an integrated bicycle and pedestrian system. I have enclosed a copy of our Better Models for Development in Delaware. You can also find information regarding “traditional neighborhood design” at [http://www.atlreg.com/qualitygrowth/planning/Toolkits/TND\\_TOOL.pdf](http://www.atlreg.com/qualitygrowth/planning/Toolkits/TND_TOOL.pdf) or <http://www.cnu.org/about/index.cfm>
- The amount of parking proposed for the project should be reduced to the extent practical. Redesigning as mentioned above and providing for some shared parking among different uses would help to accomplish this.

### **Natural and Cultural Resources**

- It is also recommended that the developer maintain a minimum 100-foot buffer width from landward edge of all wetlands.
- It is also strongly recommended that all Stormwater management pond(s) be at least 100 feet away from all wetlands and/or streams.
- The applicant should **minimize** the clearing/removal of trees or for in the upland forested areas of this parcel.
- The existing stormwater management pond is located adjacent to athletic fields and should have at least a 50-foot vegetative buffer around it to discourage nuisance waterfowl.

The following are a complete list of comments received by State agencies:

### **Office of State Planning Coordination – Contact: Ann Marie Townshend 739-3090**

The Office of State Planning Coordination notes that this proposal is located in an Investment Level 2 area according to the Strategies for State Policies and Spending and that it is proposed for annexation into the Town of Dagsboro. State policies support growth in Investment Level 2 areas.

The Office of State Planning Coordination has received the plan of services application from the Town of Dagsboro regarding the proposed annexation. The plan of services is currently under review, and the Office of State Planning Coordination will respond to the Town of Dagsboro separately regarding the plan of services.

With the mix of uses proposed for this project, the Office of State Planning Coordination believes that the project presents a great opportunity for a “traditional neighborhood design” proposal that provides for integration of the proposed uses in an environment that is conducive to walking, bicycling, and transit. In order to create a “traditional neighborhood design”, the proposal would need to be redesigned. Redesigning the proposal to a traditional neighborhood design would allow for the project to better fit in with the current Town of Dagsboro. It would also allow for some shared parking, thereby reducing the need for the excessive amount of parking shown on the site plan.

Some design changes would include moving buildings closer to the proposed road that would connect Route 113 to Route 26. This would allow this street to function as a main street, with parking to the rear. Designing at a pedestrian scale would create an atmosphere where people do not feel the need to use their cars to travel throughout the community. Attached is a copy of our Better Models for Development in Delaware. You can also find information regarding “traditional neighborhood design” at [http://www.atreg.com/qualitygrowth/planning/Toolkits/TND\\_TOOL.pdf](http://www.atreg.com/qualitygrowth/planning/Toolkits/TND_TOOL.pdf) or <http://www.cnu.org/about/index.cfm>

**State Historic Preservation Office (SHPO) – Contact: Alice Guerrant 739-5685**

There are no known archeological resources in the project area and there is a low probability of historic period archaeological sites. While there is medium probability of prehistoric period sites near the old stream corridors, this part of the parcel has already been graded for ball fields and a storm water pond. Any remaining site area will be protected by the required buffer along the tax ditch. Therefore, this project will not affect any historic properties.

**Department of Transportation – Contact: Bill Brockenbrough 760-2109**

- 1) DelDOT anticipates requiring a traffic impact study (TIS) for this project. Their concern is with the proposed office and retail development. While the study would have to account for the other existing and proposed uses, they would be willing to work with the church and the Town on a phased plan of development that would allow the new church and school and the residential development to proceed while the TIS is in process. To obtain a scope of work for the TIS, the church should have their traffic engineer contact Mr. Todd Sammons of the DelDOT planning office. Mr. Sammons may be reached at (302) 760-2134.

- 2) DelDOT's US 113 North-South Study is presently evaluating alternative alignments for a limited access highway between Milford and the Maryland line at Selbyville. In the Dagsboro area, there are multiple alignments under consideration. Presently DelDOT is still gathering input from the public and they appreciate the church's working with them in this regard. DelDOT anticipates making a determination on the alternatives to be retained for detailed analysis by this summer. The alignments that are receiving the most consideration presently are eastern bypasses and improving the existing road. Improving the existing road would mean building new southbound lanes and adding a service road. This alternative would require rights-of-way from the church property and changes to the church's access. For more information on the US 113 North-South Study, the church or the Town may contact Mr. Monroe Hite at (302) 760-2120.
- 3) The church's site engineer should contact the DelDOT Subdivision Manager for Sussex County, Mr. John Fiori, regarding our requirements for access. Mr. Fiori may be reached at (302) 760-2260.

**The Department of Natural Resources and Environmental Control – Contact: Kevin Coyle 739-3091**

**Soils**

According to the soil survey update Hammonton, Klej, Askecksy, and Mullica-Berryland complex were mapped in the immediate vicinity of the proposed construction.

Hammonton is a moderately well-drained soil of low-lying uplands that has moderate limitations for development. Klej is a transitional soil between uplands and wetlands that is likely to contain both hydric (indicative of wetlands) and non-hydric soil components.

It should also be noted that the high proportion of very wet Mullica-Berryland soils on this parcel may subject future residents to much greater susceptibility to flooding events.

**Wetlands**

Statewide Wetland Mapping Project (SWMP) maps indicate the presence of palustrine forested wetlands in the southern portion of this site.

Although impacts are not anticipated, a wetland delineation, in accordance with the methodology established by the Corps of Engineers Wetlands Delineation Manual, (Technical Report Y-87-1) should still be conducted to ensure against unanticipated impacts. Once complete, this delineation should be verified Corps of Engineers through the Jurisdictional Determination process.

**It is also recommended that the developer maintain a minimum 100-foot buffer width from landward edge of all wetlands.** In cases where natural buffer vegetation has been removed or reduced by past development or farming activities, the developer is

encouraged to restore/establish to said buffer width or greater with native herbaceous and/or woody vegetation. **It is also strongly recommended that all Stormwater management pond(s) be at least 100 feet away from all wetlands and/or streams.**

Further, it is recommended that the Farm Services Agency of the USDA be contacted to assess whether the farmed wetlands on subject parcel meet the recognized criteria for classification as “prior converted wetlands.” Prior converted wetlands are farmed wetlands that have drained or altered before December 23, 1985, and no longer meet the wetland criteria established under the 404 program. Such wetlands are considered exempt from regulatory protection provided that there is no proof of a continuous “fallow period” of five years or greater in that parcel’s cropping history. Parcels converted after said date regardless of cropping history are considered jurisdictional by the Army Corps of Engineers (ACOE). The contact person for assessing a parcel’s cropping history is Sally Griffin at the USDA – she can be reached at 678-4182.

The project may involve Subaqueous Lands regulated by the State of Delaware. Contact the Wetlands and Subaqueous Lands Section at (302) 739-4691.

### **ERES Waters**

This project is located adjacent to receiving waters of Inland Bays designated as waters having Exceptional Recreational or Ecological Significance (ERES). ERES waters are recognized as special assets of the State, and shall be protected and/or restored, to the maximum extent practicable, to their natural condition. Provisions in Section 11.5 of Delaware’s “Surface Water Quality Standards” (as amended August 11, 1999), specify that all designated ERES waters and receiving tributaries develop a “pollution control strategy” to reduce non-point sources of nutrient runoff through implementation of Best Management Practices (BMPs). Best Management Practices as defined in subsection 11.5(e) of this section, expressly authorizes the Department to provide standards for controlling the addition of pollutants and reducing them to the greatest degree practicable, or where attainable, a standard requiring no discharge of pollutants.

### **TMDLs**

With the adoption of Total Maximum Daily Loads (TMDLs) as a “nutrient-runoff-mitigation strategy” for reducing nutrients in the Inland Bays Watershed, reduction of nitrogen and phosphorus loading will be mandatory. A TMDL is the maximum level of pollution allowed for a given pollutant below which a “water quality limited water body” can assimilate and still meet water quality standards to the extent necessary to support use goals such as, swimming, fishing, drinking water and shell fish harvesting. Although TMDLs are authorized under federal code, states are charged with developing and implementing standards to support those desired use goals. The Jurisdictional authority for attaining these use goals will fall under the auspices of Section 11.5 of the State of

Delaware's Surface Water Quality Standards (as amended August 11, 1999), and will be achieved via nutrient reductions referred to as "pollution control strategies."

Nutrient reductions prescribed under TMDLs are assigned on basis of water quality concerns – that is, the those regions deemed to be of greatest environmental concern will require correspondingly higher levels of nutrient reduction than those regions deemed less environmentally sensitive. In this watershed, these regions are demarcated as high and low reduction zones. The high reduction zone corresponds to the western portion of the watershed, and requires a reduction of nitrogen and phosphorus by 85 and 65 percent, respectively. The low reduction zone corresponds to the eastern portion of the watershed, and requires a reduction of nitrogen and phosphorus by 40 percent. **This project is proposed within the high nutrient reduction zone.**

**In order for the applicant to verify compliance with the TMDL mandate, a full nutrient accounting process known as nutrient budget should be prepared. The developer/consultant should contact Lyle Jones in the Department's Watershed Assessment Section for further information regarding the acceptable protocol for calculating a nutrient budget. He can be reached as 739-4590.**

### **Water Supply**

Should dewatering points be needed during any phase of construction, a dewatering well construction permit must be obtained from the Water Supply Section prior to construction of the well points. In addition, a water allocation permit will be needed if the pumping rate will exceed 50,000 gallons per day at any time during operation.

All well permit applications must be prepared and signed by licensed water well contractors, and only licensed well drillers may construct the wells. Please factor in the necessary time for processing the well permit applications into the construction schedule. Dewatering well permit applications typically take approximately four weeks to process, which allows the necessary time for technical review and advertising.

Potential Contamination Sources do exist in part of this area, and any well permit applications will undergo a detailed review that may increase turnaround time and may require site specific conditions/recommendations.

Should you have any questions concerning these comments, please contact Roy Rios at 302-739-3665.

### **Impervious Cover/Parking**

It is recommended that the number of parking spaces be minimized (as much as possible) to reduce the amount of impervious cover. One consideration in reducing the number of parking spaces is the shared use of parking between the church and retail facilities. Tree plantings in the parking lot islands for esthetic value are also encouraged.

### **Sediment and Erosion Control/Stormwater Management**

1. Please submit a sediment control and stormwater management plan to the Sussex Conservation District for review. No construction (i.e. clearing, filling, grading, etc.) shall take place on-site until a sediment control and stormwater management plan has been approved by the Conservation District.
2. Please indicate on the sediment and stormwater management plan who shall be responsible for maintenance of the stormwater management facilities both during construction and after.
3. During the design of the sediment control and stormwater management plan, considerations should be made for maintenance (i.e. access, easements, etc.) of any structures or facilities.
4. During the design of the stormwater management facility please note that both stormwater quantity and quality must be addressed.
5. If a stormwater management pond is going to be utilized as a sediment trap/basin during construction it must be designed to accommodate 3600 cubic feet of storage per acre of contributing drainage area until project stabilization is complete.
6. All ponds are required to be constructed per pond code 378.
7. Please note that if the stormwater facilities will impact wetlands, a permit must be provided to the District prior to receiving approval.
8. Due to the proximity to sensitive areas, the Conservation District will require reinforced and super silt fence to adequately protect wetland areas during the construction of the site
9. A CCR is required for this development since the gross acreage for the project exceeds 50 acres.
10. The stormwater facilities are long and narrow. The pond configuration does not allow for the required 50-75% open water in the pond area in order to prevent mosquito breeding. Please redesign the stormwater facilities to comply with the DNREC Health and Safety Memo of 2000.
11. Please contact DNREC Drainage Section to determine if this property is located within a Tax Ditch Watershed.

## **Forests**

The conceptual design submitted by the applicant proposes a significant removal or fragmentation of upland forest to accommodate said development. The Department has serious concerns about such activities because of their impacts on water and habitat quality. Research has consistently shown that the clearing or subdividing a larger continuous forest into smaller fragments or blocks – such as proposed in this project – usually results in substantial degradation of water and habitat quality within a given watershed. Since deforestation and its impacts are cumulative at the watershed scale, efforts to protect the remaining forest remnants is a Departmental priority. Therefore, the Department recommends that the applicant **minimize** the clearing/removal of trees or for in the upland forested areas of this parcel.

## **Open Space**

In areas set aside for passive open space, the developer is encouraged to consider establishment meadow-type grasses. Once established, this ecosystem will provide increased water infiltration into groundwater, decreased run-off into surface water, air quality improvements, and require much less maintenance than traditional turf grass. Open space containing forest and/or wetlands should be placed into a permanent conservation easement or other permanent protection mechanism.

## **Nuisance Waterfowl**

The existing stormwater management pond is located adjacent to athletic fields and should have at least a 50-foot vegetative buffer around it to discourage nuisance waterfowl. According to the applicant, this pond is seasonally dry, however, with the large amount of impervious surface proposed it could receive adequate water to attract geese. Short manicured lawns around ponds provide an attractive habitat for these species. However, native plantings, including tall grasses, wildflowers, shrubs, and trees at the edge and within a buffer area (at least 50 feet) around ponds, are not as attractive to geese because they do not feel as safe from predators and other disturbance when their view of the area is blocked. The Division of Fish and Wildlife does not provide goose control services, and if problems arise, residents or the home-owners association will have to accept the burden of dealing with these species (e.g., permit applications, costs, securing services of certified wildlife professionals). Solutions can be costly and labor intensive; however, with a reduction in the number of ponds, proper landscaping, monitoring, and other techniques, geese problems can be minimized.

## **Underground Storage Tanks**

There are two inactive LUST site(s) located near the proposed project:

Wells Country Store, Facility # 5-000489, Project # S9101019

Frey's Car Care Center, Facility # 5-000297, Project # S9104075

No environmental impact is expected from the above inactive/active LUST site(s). However, should any underground storage tank or petroleum contaminated soil be discovered during construction, the Tank Management Branch must be notified as soon as possible. It is not anticipated that any construction specifications would be need to be changed due to petroleum contamination. However, should any unanticipated contamination be encountered and PVC pipe is being utilized, it will need to be changed to ductile steel in the contaminated areas.

### **Recreation**

DNREC appreciates the mixed use on the property and recommends pedestrian friendly design to encourage and facilitate walking in the community and beyond.

### **State Fire Marshal's Office – Contact: Duane Fox 302-856-5298**

These comments are intended for informational use only and do not constitute any type of approval from the Delaware State Fire Marshal's Office. At the time of formal submittal, the applicant shall provide; completed application, fee, and three sets of plans depicting the following in accordance with the Delaware State Fire Prevention Regulation (DSFPR):

- a. **Fire Protection Water Requirements:**
  - Water distribution system capable of delivering at least 1500 gpm for 2-hour duration, at 20-psi residual pressure is required. Fire hydrants with 800 feet spacing on centers. (Mercantile)
  - Water distribution system capable of delivering at least 1000 gpm for 1-hour duration, at 20-psi residual pressure is required. Fire hydrants with 800 feet spacing on centers. (Assembly, Business, and Townhouses)
  - Where a water distribution system is proposed for the site, the infrastructure for fire protection water shall be provided, including the size of water mains for fire hydrants and sprinkler systems.
  
- b. **Fire Protection Features:**
  - All structures over 10,000 Sq. Ft. aggregate will require automatic sprinkler protection installed.
  - Buildings greater than 10,000 sq.ft., 3-stories of more or over 35 feet, or classified as High Hazard, are required to meet fire lane marking requirements.
  - Show Fire Department Connection location (Must be within 300 feet of fire hydrant), and detail as shown in the DSFPR.
  - Show Fire Lanes and Sign Detail as shown in DSFPR
  - For townhouse buildings, provide a section / detail and the UL design number of the 2-hour fire rated separation wall on the Site plan.

c. **Accessibility**

- All premises which the fire department may be called upon to protect in case of fire, and which are not readily accessible from public roads, shall be provided with suitable gates and access roads, and fire lanes so that all buildings on the premises are accessible to fire apparatus. This means that the access road to the subdivision from US Route 113 must be constructed so fire department apparatus may negotiate it.
- Fire department access shall be provided in such a manner so that fire apparatus will be able to locate within 100 ft. of the front door.
- Any dead end road more than 300 feet in length shall be provided with a turn-around or cul-de-sac arranged such that fire apparatus will be able to turn around by making not more than one backing maneuver. The minimum paved radius of the cul-de-sac shall be 38 feet. The dimensions of the cul-de-sac or turn-around shall be shown on the final plans. Also, please be advised that parking is prohibited in the cul-de-sac or turn around.
- The use of speed bumps or other methods of traffic speed reduction must be in accordance with Department of Transportation requirements.
- The local Fire Chief, prior to any submission to our Agency, shall approve in writing the use of gates that limit fire department access into and out of the development or property.

d. **Gas Piping and System Information:**

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

e. **Required Notes:**

- Provide a note on the final plans submitted for review to read “ All fire lanes, fire hydrants, and fire department connections shall be marked in accordance with the Delaware State Fire Prevention Regulations”
- Proposed Use
- Alpha or Numerical Labels for each building/unit for sites with multiple buildings/units
- Square footage of each structure (Total of all Floors)
- National Fire Protection Association (NFPA) Construction Type
- Maximum Height of Buildings (including number of stories)
- Townhouse 2-hr separation wall details shall be shown on site plans
- Note indicating if building is to be sprinklered
- Name of Water Provider
- Letter from Water Provider approving the system layout
- Provide Lock Box Note (as detailed in DSFPR) if Building is to be sprinklered
- Provide Road Names, even for County Roads

Preliminary meetings with fire protection specialists are encouraged prior to formal submittal. Please call for appointment. Applications and brochures can be downloaded from our website: [www.delawarestatefiremarshal.com](http://www.delawarestatefiremarshal.com), technical services link, plan review, applications or brochures

**Department of Agriculture - Contact: Mark Davis 739-4811**

*Overall Comments*

Based on the proposed site location, the Delaware Department of Agriculture and the Delaware Forest Service has no objections to the use defined on the application provided to this office. The Delaware Forest Service extends its services to developer and their client to implement several recommendations for landscaping the site to improve the quality of life for students and its members.

*Right Tree for the Right Place*

The Delaware Department of Agriculture Forest Service encourages the developer to use the "Right Tree for the Right Place" for any design considerations. This concept allows for the proper placement of trees to increase property values in upwards of 25% of appraised value and will reduce heating and cooling costs on average by 20 to 35 dollars per month. In addition, a landscape design that encompasses this approach will avoid future maintenance cost to the property owner and ensure a lasting forest resource.

*Native Landscapes*

The Department of Agriculture and the Delaware Forest Service encourages the developer to use native trees and shrubs to buffer the property from the adjacent land-use activities near this site. A properly designed forested buffer can create wildlife habitat corridors and improve air quality to the area by removing six to eight tons of carbon dioxide annually and clean our rivers and creeks of storm-water run-off pollutants. To learn more about acceptable native trees and how to avoid plants considered invasive to our local landscapes, please contact the Delaware Department of Agriculture Plant Industry Section at (302) 698-4500.

**Public Service Commission - Contact: Andrea Maucher 739-4247**

The information provided indicates that the Town of Dagsboro in cooperation with the Town of Millsboro will provide water to the proposed projects through a central public water system. PSC files reflect that neither the Town of Dagsboro nor the Town of Millsboro currently hold a certificate of public convenience and necessity (CPCN) to provide public water in these areas. If this parcel is annexed, the Town will need to notify the Commission when the annexation is complete. If the Town intends to serve this project prior to or without annexation, you will need to file an application for a CPCN with the Public Service Commission. Information on CPCN requirements and

applications can be obtained by contacting the Public Service Commission at 302-739-4247.

Any expansion of natural gas or installation of a closed propane system must fall within Pipeline Safety guidelines. Contact: Malak Michael at (302) 739-4247.

If this project lies outside the County's wastewater service territory as of October 2004, the County must update the information it filed with the Commission.

**Delaware State Housing Authority – Contact Karen Horton 739-4263**

According to the State Strategies Map, the proposal is located in Investment Level 2. The Delaware State Housing Authority supports this proposal because the 2003 Statewide Housing Needs Assessment indicates that the elderly is the fastest growing segment of Delaware's population and housing is needed to meet this demand. The proposal is also located in an area with close proximity to existing markets and services, which will enable them to remain active and visible in the community.

**Delaware Emergency Management Agency – Contact: Don Knox 659-3362**

Due to the multiple uses (church, church school, retail offices, and apartments and townhomes for the elderly) being proposed, a significant impact to public safety is foreseen by implementation of this project. The developer should notify the police, fire service, and emergency medical response organization serving the Town of Dagsboro, to keep them apprised of all development activities.

Routes 26 and 113 are coastal storm evacuation routes and this multiple use project will be affected by traffic volume on these routes during a coastal storm event.

**Sussex County – Contact Richard Kautz 856-7878**

Although the site is proposed to be located with in the Town of Dagsboro, the parking setbacks and landscaping along Route 113 should be comparable with the recently adopted Highway Corridor Overlay requirements in the Sussex County Zoning Ordinance. The ordinance amendment can be found on the County web page at <http://www.sussexcountyde.gov/e-gov/ordinances/index.cfm> This will eventually allow for design consistency along Route 113.

The Sussex County Engineer Comments are listed below:

The project is within the boundaries of the Dagsboro/Frankford Sanitary Sewer District (DFSSD) with the exception of parcels 51.00 and 51.01. The Sussex County Engineering Department (SCED) will not recommend annexing parcels 51.00 and 51.01 into the

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DFSSD until the completion of the Dagsboro/Frankford Planning Study is complete. The completion date of the planning study is currently January 2007.

The SCED has committed to capacity for 60 EDU's due to capacity concerns. According to the project proposal, there will be 140 EDU's (42,000 GPD 4 300 GPD/EDU) involved with the project. Development in the Town will be monitored to determine if additional capacity can be allocated. The proposed project will require a developer installed collection system in accordance with Sussex County's standard requirements and procedures. If system upgrades are required, the developer, at the developer's expense, will perform the upgrades in accordance with Sussex County's standard requirements and procedures. The Town has a letter from Mr. Russell W. Archut, Assistant County Engineer to Mayor S. Bradley Connor, dated August 18, 2004, regarding the proposed project and available sewer capacity.

The Sussex County Engineering Department requires an approved Sewer Concept Plan be submitted for review and approval prior to construction plan submittal.

One-time System Connection Charges will apply for the commercial use, apartments and townhomes. The one-time System Connection Charges may not be limited to only these uses. Please contact Mrs. Evelyn Anthony at 302 855-7719 for additional information on charges.

For questions concerning these comments, contact Chris Calio, Sussex County Engineering Department at (302) 855-7839.

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

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

Sincerely,

A handwritten signature in cursive script that reads "Constance C. Holland".

Constance C. Holland, AICP  
Director

CC: Dagsboro Church of God  
Sussex County