



STATE OF DELAWARE
EXECUTIVE DEPARTMENT
OFFICE OF STATE PLANNING COORDINATION

June 22, 2017

Jonathan Street
Becker Morgan Group, Inc.
309 South Governors Ave.
Dover, DE 19904

RE: PLUS review 2017-05-08, Bay Road Commercial

Dear Jonathan,

Thank you for meeting with State agency planners on May 24, 2017 to discuss the Bay Road Commercial project. According to the information received, you are seeking a review of a site plan for 120,000 square feet of commercial space on 12.9 acres along Bay Road in Dover.

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 as the City of Dover is the governing authority over this land, the developers will need to comply with any and all regulations/restrictions set forth by the City as well as Kent County.**

Strategies for State Policies and Spending

- This project is located in Investment Level 1 according to the *Strategies for State Policies and Spending*. Investment Level 1 reflects areas that are already developed in an urban or suburban fashion, where infrastructure is existing or readily available, and where future redevelopment or infill projects are expected and encouraged by State policy. Thus, the Office of State Planning Coordination has no objections to this development.

Code Requirements/Agency Permitting Requirements

Department of Transportation – Contact Bill Brockenbrough 760-2109

- The site access on Bay Road (Kent Road 7) must be designed and built in accordance with DelDOT's Development Coordination Manual (formerly the Standards and Regulations for Subdivision Streets and State Highway Access), which is available at <http://www.deldot.gov/information/business/subdivisions/changes/index.shtml>.

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- Per Section 2.2.2.1 of the Development Coordination Manual, Traffic Impact Studies (TIS) are warranted for developments generating more than 500 vehicle trip ends per day or 50 vehicle trip ends per hour in any hour of the day. The proposed development meets those warrants and a TIS is required by DelDOT regulations. A TIS was done for a similar development proposal on this site in 2010. Preliminarily, DelDOT finds it to still be valid but is willing to revisit the matter if the City requires a new study. A copy of DelDOT's comments on the 2010 study are attached.

From discussion at the PLUS meeting, it may be necessary to update some of the bicycle and pedestrian recommendations from the TIS review. DelDOT believes that can be done as part of the plan review process.

- Pursuant to Section P.3 of the Manual, a Pre-Submittal Meeting is required before plans are submitted for review. The form needed to request the meeting and guidance on what will be covered there and how to prepare for it is located at http://www.deldot.gov/information/business/subdivisions/Meeting_Request_Form.pdf. DelDOT anticipates having more detailed comments to offer at that time.
- As necessary, in accordance with Section 3.2.5 and Figure 3.2.5-a of the Manual, DelDOT will require dedication of right-of-way along the site's frontage on Bay Road. By this regulation, this dedication is to provide a minimum of 30 feet of right-of-way from the outermost edge of the through lanes. The following right-of-way dedication note is required, "**An X-foot wide right-of-way is hereby dedicated to the State of Delaware, as per this plat.**" DelDOT would have a similar requirement for the Delaware Route 1 frontage but they are confident that the minimum right-of-way exists there.
- In accordance with Section 3.2.5.1.2 of the Manual, DelDOT will require the establishment of a 15-foot wide permanent easement across the property frontage on Bay Road. The location of the easement shall be outside the limits of the ultimate right-of-way. The easement area can be used as part of the open space calculation for the site. The following note is required, "**A 15-foot wide permanent easement is hereby established to the State of Delaware, as per this plat.**"
- As per the Delaware Strategies for State Policies and Spending, this development is primarily in Investment Level 1. Referring to Section 3.5.4.2.A of the Manual, developments in Level 1 and 2 Areas are required to install a sidewalk or Shared Use Path. If a physical impossibility exists, a fee in lieu of construction is required but we see no such impossibility in this instance.
- In accordance with Section 3.8 of the Development Coordination Manual, storm water facilities, excluding filter strips and bioswales, shall be located a minimum of 20 feet from the ultimate State right-of-way along Bay Road.

Department of Natural Resources and Environmental Control – Contact Michael Tholstrup 735-3352

Executive Summary.

Development of this parcel will result in increased impervious surface and new sources of greenhouse gas emissions. Opportunities exist to reduce the environmental impact on-site through appropriate use of pollution control strategies, minimized tree clearing and nature-based infrastructure. We have outlined a number of best management practices to assist in protecting the resource and the overall health of the community.

The State of Delaware is threatened by climate change and has a goal of reducing greenhouse gas emissions by 30 percent by 2030. Appropriate development and re-development that provides access to public transportation, opportunities to walk and bike to shopping and recreation, and that employs energy efficient building standards are among key strategies to meet these goals. We encourage the use of high performance building standards and consideration of alternative energy sources to promote clean sustainable energy and reduce greenhouse gas emissions. This could mean siting the buildings to take advantage of solar and geothermal systems, and/or including infrastructure for electric vehicle charging stations (funding assistance may be found at www.de.gov/cleantransportation). We further recommend an abundant use of native vegetation and shade trees throughout the landscape, as well as pervious pavement and green infrastructure, where practicable, to absorb carbon dioxide, protect water quality and provide relief to residents on hot days.

The following pages provide information about applicable regulations and detailed recommendations associated with this project, from various DNREC Divisions. We would like to be a partner in creating appropriate development that protects and highlights the environment as a natural amenity of the landscape. The Department has resources and expertise that are available to help make this a reality, often at no expense to the landowner.

Water Quality: TMDLs.

- The project is located in the greater Delaware River and Bay drainage, specifically within the St. Jones River watershed. In this watershed, the State of Delaware has developed specific Total Maximum Daily Load (TMDL) pollutant reduction targets for nitrogen, phosphorus, and bacteria (under the auspices of Section 303(d) of the Clean Water Act). A TMDL is the maximum level of pollution allowed for a given pollutant below which a “water quality limited waterbody” can assimilate and still meet State water quality standards (e.g., dissolved oxygen, nutrients, and bacteria; State of Delaware Surface Water Quality Standards, as amended July 11, 2004) to the extent necessary to support use goals such as, swimming, fishing, drinking water and shell fish harvesting. The TMDL for the St. Jones River watershed calls for a 40 percent reduction in nitrogen and phosphorus from baseline conditions. The TMDL also calls for a 90 percent reduction in bacteria from baseline conditions.

Water Supply.

- The project information sheets state that Kent County will be used to provide public water for the proposed project. Our records indicate that the project is located within the

public water service area granted to The City of Dover under Certificate of Public Convenience and Necessity 90-CPCN-07. DNREC recommends that the developer contact The City of Dover to determine the availability of public water. Any public water utility providing water to the site must obtain a certificate of public convenience and necessity (CPCN) from the Public Service Commission. Information on CPCN's and the application process can be obtained by contacting the Public Service Commission at (302) 736-7500.

- Should an on-site Public well be needed, a minimum isolation distance of 150 feet is required between the well and any potential source of contamination, such as a septic tank and sewage disposal area, stormwater management ponds, and it must also be located at least 150 feet from the outermost boundaries of the project. The Division of Water Resources will consider applications for the construction of on-site wells provided the wells can be constructed and located in compliance with all requirements of the Regulations Governing the Construction and Use of Wells. A well construction permit must be obtained prior to constructing any wells.
- 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 four weeks to process, which allows the necessary time for technical review and advertising.

Sediment and Erosion Control/Stormwater Management

- A detailed sediment and stormwater plan will be required prior to any land disturbing activity taking place on the site. Contact the reviewing agency to schedule a pre-application meeting to discuss the sediment and erosion control and stormwater management components of the plan. The site topography, soils mapping, pre- and post-development runoff, and proposed method(s) and location(s) of stormwater management should be brought to the meeting for discussion. The plan review and approval as well as construction inspection will be coordinated through the Kent Conservation District. Contact Jared Adkins, Program Manager, at (302) 741-2600, ext. 3, for details regarding submittal requirements and fees.

Air Quality.

- The applicant shall comply with all applicable Delaware air quality regulations. Please note that the following regulations in Table 1 – Potential Regulatory Requirements may apply to your project:

Table 1: Potential Regulatory Requirements	
Regulation	Requirements
7 DE Admin. Code 1106 - Particulate Emissions from Construction and Materials Handling	<ul style="list-style-type: none"> • Use dust suppressants and measures to prevent transport of dust off-site from material stockpile, material movement and use of unpaved roads. • Use covers on trucks that transport material to and from site to prevent visible emissions.
7 DE Admin. Code 1113 – Open Burning	<ul style="list-style-type: none"> • Prohibit open burns statewide during the Ozone Season from May 1-Sept. 30 each year. • Prohibit the burning of land clearing debris. • Prohibit the burning of trash or building materials/debris.
7 DE Admin. Code 1135 – Conformity of General Federal Actions to the State Implementation Plan	<ul style="list-style-type: none"> • Require, for any “federal action,” a conformity determination for each pollutant where the total of direct and indirect emissions would equal or exceed any of the de minimus levels (See Section 3.2.1)
7 DE Admin. Code 1141 – Limiting Emissions of Volatile Organic Compounds from Consumer and Commercial Products	<ul style="list-style-type: none"> • Use structural/ paint coatings that are low in Volatile Organic Compounds. • Use covers on paint containers when paint containers are not in use.
7 DE Admin. Code 1144 – Control of Stationary Generator Emissions	<ul style="list-style-type: none"> • Ensure that emissions of nitrogen oxides (NO_x), non-methane hydrocarbons (NMHC), particulate matter (PM), sulfur dioxide (SO₂), carbon monoxide (CO), and carbon dioxide (CO₂) from emergency generators meet the emissions limits established. (See section 3.2). • Maintain recordkeeping and reporting requirements.
7 DE Admin. Code 1145 – Excessive Idling of Heavy Duty Vehicles	<ul style="list-style-type: none"> • Restrict idling time for trucks and buses having a gross vehicle weight of over 8,500 pounds to no more than three minutes.

For a complete listing of all Delaware applicable regulations, please look at our website: <http://www.awm.delaware.gov/AQM/Pages/AirRegulations.aspx>.

Recycling.

- Delaware Law and Regulations specify that the ‘commercial sector’ shall participate in a comprehensive recycling program. As such, the applicant should consider the appropriate space for collection of recyclables that would be typically generated, specifically designated space for recycling dumpsters adjacent to trash dumpsters. For more information or assistance related to recycling requirements, benefits, tools, and assistance, please contact Bill Miller at (302) 739-9403 or bill.miller@state.de.us.

Tank Management.

- If a release of a Regulated Substance occurs at the proposed project site, compliance of 7 *Del.C., Chapter 60*; 7 *Del.C., Chapter 74* and *DE Admin. Code 1351*, State of Delaware Regulations Governing Underground Storage Tank Systems (the UST Regulations) is required.
- The following Leaking Underground Storage Tank project is located within the proposed project area:
 - SHE Holding, LLC - Facility ID: 1-000873, Project: K1703037, (Inactive) 300-gal HF UST removed via HF Program. Comp-51 mg/kg DRO, Grab-ND. NFA issued March 30 2017.
- Per the UST Regulations: Part E, § 1. Reporting Requirements: Any indication of a Release of a Regulated Substance that is discovered by any Person, including but not limited to environmental consultants, contractors, utility companies, financial institutions, real estate transfer companies, UST Owners or Operators, or Responsible Parties shall be reported within 24 hours to:
 - The Department's 24-hour Release Hot Line (800) 662-8802; and
 - The DNREC Tank Management Section (302) 395-2500.
- If any aboveground storage tanks (ASTs) less than 12,500 gallons are installed, they must be registered with the TMS. If any ASTs greater than 12,500 gallons are installed, they are also subject to installation approval by the DNREC Tank Management Section.
- For more information, go to: <http://www.dnrec.delaware.gov/tanks/Pages/default.aspx> or contact Ross D. Elliott with further questions at (302) 395-2500, or Ross.Elliott@state.de.us

State Historic Preservation Office – Contact Terrence Burns 736-7404

- There is no known archaeological site or National Register listed property, on this parcel. However, the Pomeroy and Beers Atlas of 1868 shows a dwelling on the parcel associated with a W. Manlove. There may be archaeological resources from it. With this in mind, the developer should be aware of the Unmarked Human Burials and Human Skeletal Remains Law.
- Abandoned or unmarked family cemeteries are very common in the State of Delaware. They are usually in rural or open space areas, and sometimes near or within the boundary of an historic farm site. Even a marked cemetery can frequently have unmarked graves or burials outside of the known boundary line or limit. Disturbing unmarked graves or burials triggers the Delaware's Unmarked Human Burials and Human Skeletal Remains Law (Del. C. Title 7, Ch. 54), and such remains or discoveries can result in substantial delays while the procedures required under this law are carried out. If there is a discovery of any unmarked graves, burials or a cemetery, it is very costly to have them

archaeologically excavated and the burials moved. The Division of Historical & Cultural Affairs recommends that owners and/or developers have a qualified archaeological consultant investigate their project area, to the full extent, to see if there is any unmarked cemetery, graves, or burial sites. In the event of such a discovery, the Division of Historical & Cultural Affairs also recommends that the plans be re-drawn to leave the full extent of the cemeteries or any burials on its own parcel or in the open space area of the development, with the responsibility for its maintenance lying with the landowner association or development. If you would like to see more information, please review the following websites: www.history.delaware.gov/preservation/umhr.shtml and www.history.delaware.gov/preservation/cemeteries.shtml.

Therefore, prior to any demolition or ground-disturbing activities, the developer should hire an archaeological consultant, to examine the parcel for archaeological resources and plan to avoid those sites or areas.

- If there is federal involvement, in the form of licenses, permits, or funds, the federal agency, often through its client, is responsible for complying with Section 106 of the National Historic Preservation Act (36 CFR 800) and must consider their project's effects on any known or potential cultural or historic resources. Owners and developers who may plan to apply for an Army Corps of Engineers permit or for federal funding, such as HUD or USDA grants, should be aware of the National Historic Preservation Act of 1966 (as amended). Regulations promulgated for Section 106 of this Act stipulate that no ground-disturbing or demolition activities should take place before the Corps or other involved federal agency determines the area of potential effect of the project undertaking. These stipulations are in place to allow for comment from the public, the Delaware State Historic Preservation Office, and the Advisory Council for Historic Preservation about the project's effects on historic properties. Furthermore, any preconstruction activities without adherence to these stipulations may jeopardize the issuance of any permit or funds. If you need further information or additional details pertaining to the Section 106 process and the Advisory Council's role, please review the Advisory Council's website at the following: www.achp.gov.

Recommendations/Additional Information

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

Department of Transportation – Contact Bill Brockenbrough 760-2109

- Presently, a plan is pending for office and warehouse development on the land immediately north of the site. DeIDOT anticipates requiring the two developers to cooperate on one or more interconnections between their projects.

- DelDOT anticipates requiring an easement to allow the outparcel owned by B&B Delaware Investments, LLC (Tax Parcel ED-05-077.00-01-08.00) to access the drive aisles in the subject development when that parcel redevelops.
- Further regarding the outparcel owned by B&B Delaware Investments, LLC (Tax Parcel ED-05-077.00-01-08.00), DelDOT anticipates requiring the developer to continue the sidewalk or Shared Use Path required per Section 3.5.4.2.A of the Manual across the frontage of this outparcel to provide a continuous sidewalk or path from one end of the property frontage to the other. DelDOT believes there is sufficient room to do this work within the existing right-of-way.
- The applicant should expect a requirement that all PLUS and Technical Advisory Committee (TAC) comments be addressed prior to submitting plans for review.
- Please be advised that as of August 1, 2015, all new plan submittals and re-submittals, including major, minor and commercial plans, shall now be uploaded via the PDCA (Planning Development Coordination Application) with any review fee paid online via credit card or electronic check. Guidance on how to do this is available on our website at <http://www.deldot.gov/information/business/subdivisions/>
- Please be advised that the Standard General Notes have been updated and posted to the DelDOT website. Please begin using the new versions and look for the revision date of July 20, 2016. The notes can be found at http://www.deldot.gov/information/business/subdivisions/Sheet_Notes.doc?073116

Department of Natural Resources and Environmental Control – Contact Michael Tholstrup 735-3352

Additional information on TMDLs and water quality.

- A Pollution Control Strategy (PCS) to achieve the required TMDL nutrient and bacterial load reduction requirements has been established for the St. Jones watershed. The St. Jones PCS strategies can be reviewed here: <http://www.dnrec.delaware.gov/swc/wa/Pages/WatershedManagementPlans.aspx>

In support of the PCS, the applicant is strongly urged to reduce nutrient and bacterial pollutants through voluntary commitment to the implementation of the following recommended best management practices:

- Preserve and/or maintain as much of the existing open space as possible; we further suggest additional native tree, shrub and/or native herbaceous vegetation plantings, wherever possible.
- Employ green-technology storm water management such as rain gardens or rainwater catchment systems as best management practices to mitigate or reduce nutrient and bacterial pollutant runoff.

- Use pervious paving materials, when compatible or consistent with water quality concerns in areas designated as locations of excellent recharge (e.g., well head protection areas), as determined/assessed by a DNREC hydrogeologist, instead of conventional paving materials to help reduce the amount of water and pollutant runoff draining to adjoining streams and wetlands. Pervious pavers are especially recommended for the large area designated for parking in this project.

- Assess nutrient and bacterial pollutant loading at the preliminary project design phase. To this end, the Watershed Assessment Section has developed a methodology known as the “Nutrient Load Assessment Protocol.” The protocol is a tool used to assess changes in nutrient loading resulting from the conversion of individual or combined land parcels to a changed land use; thus providing applicants and governmental entities with quantitative information about the project’s impact(s) on baseline water quality. We strongly encourage the applicant/developer use this protocol to design and implement the most effective best management practices. Please contact John Martin of the Division of Watershed Stewardship for more information on the protocol, at (302) 739-9939.

Additional information on tank management.

- When contamination is encountered, PVC pipe materials should be replaced with ductile steel and nitrile rubber gaskets in the contaminated areas.

Additional information on air quality.

- New developments may emit, or cause to be emitted, additional air contaminants into Delaware’s air, which will negatively impact public health, safety and welfare. These negative impacts are attributable to:
 - Emissions that form ozone and fine particulate matter;
 - The emission of greenhouse gases which are associated with climate change, and
 - The emission of air toxics.
- Based on the information provided, vehicle emissions were quantified. Table 2 – Projected Air Quality Emissions represents the potential impact the Bay Road Commercial project may have on air quality.

Table 2: Projected Air Quality Emissions for the Bay Road Commercial					
Emissions Attributable to Bay Road Commercial (Based on Average Annual Daily Traffic (AADT) of 150 vehicle trips per day)	Volatile Organic Compounds (VOC)	Nitrogen Oxides (NOx)	Sulfur Dioxide (SO ₂)	Fine Particulate Matter (PM _{2.5})	Carbon Dioxide (CO ₂)
Mobile emissions	25.34	33.42	*	*	*

(*) *Indicates data is not available.*

Note that emissions associated with the actual construction of the business, including automobile and truck traffic from working in, or delivering products to the site, as well as site preparation, earth moving activities, road paving and other miscellaneous air emissions, are not reflected in the table above.

- Site-specific recommendations for this project:
 - Coordination of transit availability should be made for this flourishing development area. The developer is encouraged to work together with DTC/DART to accommodate transit service to the commercial center.
 - Planting of native shade trees in parking areas to clean the air of localized pollutants and cut down on energy/cooling costs.
 - Inclusion of bike racks in common areas and expansion of the bicycle/pedestrian network through sidewalks and bike lanes which also promote alternative forms of transportation.
 - The use of Recycled Content Materials (carpet, concrete, countertops, furniture, siding, of reclaimed asphalt pavement, etc.) which reduces landfill waste, is sustainable and more economically feasible than other material types. Sustainable pavements (or cool pavement choices with higher albedo) reflect 40 percent more sunlight than warm pavements which only reflect 10 percent.
 - Use of energy efficient products in construction to lessen the power source emissions of the project and costs.
 - Take advantage of compact building design to preserve open space. Open space protects animals and plants and conserves their habitat as well as moderates temperatures and combats air pollution.
 - At least two parking spaces in common areas (for each facility) dedicated to alternative fueled vehicle (electric vehicle (EV), hybrid electric vehicle (HEV), low emission vehicle (LEV)) use and charging.
- Tree Buffer or Canopy: Some green streetscape elements that the Bay Road Commercial could incorporate are a tree buffer or expansion of the City of Dover's tree canopy. According to the Delaware Forest Service, in 2014, the City of Dover's tree canopy percentage was 25.7 percent. Native trees reduce emissions by trapping dust particles and replenishing oxygen. Trees also reduce energy emissions by cooling during the summer and by providing wind breaks in the winter, whereby reducing air conditioning needs by up to 30 percent and saving 20 to 50 percent on fuel costs. All urban trees that are selected should be native to Delaware and preferably low VOC emitting trees. Every tree has a different biogenic emissions rate by which they release VOC's into our atmosphere. VOC's are a component of smog and when mixed with other gases in the atmosphere

(nitrogen oxide or NO_x) in the presence of sunlight can contribute to air pollution risks. As a general reminder, the best trees to plant are those that have a large leaf surface area at maturity, contain leaf characteristics that are amenable to particle collection from particulate matter (PM) such as those that have hairy or sticky leaves and have high transpiration rates which result in relatively high temperature reduction.

- **Energy Efficient Options:** Constructing with only energy efficient products can help your housing units immensely, not only in terms of environmental sustainability but financially. Energy Star qualified products are up to 30 percent more energy efficient. Savings come from building envelope upgrades, high performance windows, controlled air infiltration, upgraded heating and air conditioning systems, tight duct systems and upgraded water-heating equipment. Every percentage of energy efficiency translates into a percent reduction in pollution. The Energy Star Program is an excellent way to save on energy costs and reduce air pollution. Providing shade for parking areas can also be of added benefit to this facility. Some approaches may include architectural devices, vegetation, or solar panels. Providing shade for parking areas helps to reduce heat island impacts, and, by extension, helps to minimize the potential for localized ground-level ozone formation. For more about energy efficient options, please see: <https://www.energystar.gov/> or <https://www.epa.gov/greeningepa/energy-efficiency-epa>.
- **Clean Fuel Measures:** This measure helps to reduce localized air pollution by supporting the use of clean diesel powered vehicles and charging infrastructure. It would be ideal to include electric vehicle (EV) or hybrid vehicle (HV) parking and at least one charging station in common areas (www.de.gov/cleantransportation).

For a site map of local alternative fueling sites, please visit the Alternative Fuels Data Center website here: <http://www.afdc.energy.gov/locator/stations/>.

- Should the developer have any more questions or concerns, the DNREC Division of Air Quality (DAQ) point of contact is Lauren DeVore, and she may be reached at (302) 739-9437 or lauren.devore@state.de.us. The applicant is encouraged to contact DAQ to discuss the emission mitigation measures that will be incorporated into the Bay Road Commercial project. We look forward to working together with you on this project to achieve our shared air quality goals!

Soils Assessment.

- Based on soils survey mapping update, Urban land (Up) was the only soil mapping unit mapped on subject parcel. Urban land has been extensively modified through cutting, filling, and grading practices. This soil map unit has indeterminate drainage but is usually well or moderately well drained.

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 blue ink that reads "Constance C. Holland". The signature is written in a cursive style with a large initial 'C'.

Constance C. Holland, AICP

Director, Office of State Planning Coordination

CC: Kent County
City of Dover