

Rehoboth Beach Comprehensive Development Plan
Comments Received on Draft #5 (since release on February 1, 2022)
Updated: April 21, 2022

No.	Name	Comment Category	Address or Affiliation	Chapter	Page	Paragraph	Comment
1	Lynne Coan	City	Staff	00 - Up Fronts	ii	City Staff	In the staff listing, my name should replace that of Krys Johnson.
2	Wyn Achenbaum	Public	62 Columbia Avenue	00 - Up Fronts	iii	Consultants	formatting: Madalyn Puskar, Engineer in Training - needs an m-dash instead of a comma.
3	Wyn Achenbaum	Public	62 Columbia Avenue	00 - Up Fronts	iii	State of Delaware	check "Peter C. Schwartzkopf, Legislator District 12" - Representative
4	Wyn Achenbaum	Public	62 Columbia Avenue	00 - Up Fronts	iv	TOC	LGBT -- likely needs Q+?
5	Wyn Achenbaum	Public	62 Columbia Avenue	1 - Executive Summary & Vision	3	Vision for Water Resources	Could "protects views to and from the water" be construed as seeking to prevent wind turbines in the ocean? I don't think that is intended, but it could be used that way.
6	Wyn Achenbaum	Public	62 Columbia Avenue	1 - Executive Summary & Vision	3	Vision for City Character	does "protection of . . . cultural features" obligate us to prioritize the construction of a large theater complex on Rehoboth A venue, and a 5-week camp program whose dropoffs and pickups, in that location, seem likely to be a public nuisance, over the flow of traffic and the availability of parking for the existing businesses along the western portion of Rehoboth Avenue?
7	Wyn Achenbaum	Public	62 Columbia Avenue	1 - Executive Summary & Vision	3	Vision for City Character	this portion of the sentence is awkwardly worded: "Rehoboth Beach is a physically and socially integrated community where residents, property owners, and tourists-be they retirees, individuals, families, or members of the business community- ... "
8	Jim Ellison	City	Planning Commission	1 - Executive Summary & Vision	3	Visions	Vision Titles (in blue) need to be made more prominent – perhaps on the 3rd level of black bold caps.
9	Wyn Achenbaum	Public	62 Columbia Avenue	1 - Executive Summary & Vision	4	Vision for Business	should it be an explicit GOAL to move to encourage more year-round businesses?
10	Wyn Achenbaum	Public	62 Columbia Avenue	1 - Executive Summary & Vision	4	Key Areas	"Protection of the quality of life within the City's existing commercial districts and residential neighborhoods from adverse impacts of future (re)development plans and projects that will be incompatible with the City's traditional small-town character, existing architecture, and pedestrian-oriented scale." This needs to be made a bit more specific, to include code that would prevent large users of large amounts of non-existent parking from locating in the city without providing or obtaining dedicated off-street parking.
11	Wyn Achenbaum	Public	62 Columbia Avenue	1 - Executive Summary & Vision	4	Vision for Business	remove the comma after "locally owned" and perhaps hyphenate "locally owned." Might this go further, and specify (somehow) non-chain non-franchise, each with its own personality?
12	Wyn Achenbaum	Public	62 Columbia Avenue	1 - Executive Summary & Vision	6	Position on Population Growth	Population Growth: though we all believe there are more year-round residents, the first 2020 Census data shows a population in the range of 1000 to 2000; this needs to be addressed in the CDP.
13	Wyn Achenbaum	Public	62 Columbia Avenue	1 - Executive Summary & Vision	6	Position on Expansion of Boundaries	"Position on Expansion of Boundaries: Careful consideration should be given to future expansion of City boundaries through annexation." This sounds as if the CDP intends to urge us to take on annexation. Is that the intention?
14	Jamie Whitehouse	Agency	Sussex County Planning & Zoning Director	1 - Executive Summary & Vision	6	Position on Housing Growth	The County is currently exploring a potential Ordinance to foster the increased provision of workforce housing within the unincorporated areas of Sussex County. As workforce housing is a form of affordable housing, it may assist to outline that the position on housing growth within the draft aligns with Sussex County.
15	Karen Horton	Agency	PLUS: State Housing Authority	1 - Executive Summary & Vision	6	Position on Housing Growth	According to Title 22, Section 702Del C., towns with a population of less than 2,000 are required to state their position on housing growth within the municipality. DSHA has no certification concerns with the Town's position.
16	Wyn Achenbaum	Public	62 Columbia Avenue	1 - Executive Summary & Vision	7	Position on the General Use of Land	WHAT DOES THIS SENTENCE MEAN? "The City recognizes there will always be a rolling life cycle to the use of its buildings and acknowledges there may be a future need for new tools to accommodate that change." We have a lot of fairly old buildings in our commercial district that continue to command high rents because of their location in a resort town.
17	Jamie Whitehouse	Agency	Sussex County Planning & Zoning Director	1 - Executive Summary & Vision	14	Action Item H	The consideration of an upland wetland buffer requirement and resource buffer management is a topic that is also under consideration at the County level. The County established a Working Group to assist in the development of a Draft Ordinance. Members of the Working Group, such as the Center for Inland Bays, may be of assistance with this.
18	Wyn Achenbaum	Public	62 Columbia Avenue	2 - Introduction	7	Resource & Svc Capacities	ambiance should be ambiance.
19	Wyn Achenbaum	Public	62 Columbia Avenue	2 - Introduction	7	Continued Residential Ambiance...Bullet 1	(3) The overall aim of traffic management in Rehoboth IS to retain the pedestrian orientation of the City by getting cars off the streets and allowing people TO use alternate means of moving about the City such as walking, biking, and shuttle services.
20	Jamie Whitehouse	Agency	Sussex County Planning & Zoning Director	2 - Introduction	8	Planning for Physical...Bullet 4	The concept of the establishment of a mixed-use zone to enable the blending of residential and commercial uses would be beneficial and generates no concerns in terms of compatibility with the existing zoning districts of adjacent land within the County's jurisdiction.
21	Jim Ellison	City	Planning Commission	2 - Introduction	8	2020 CDP Process	I believe the section on "2020 Comprehensive Development Plan Process" should not be listed under "Comprehensive Development Plan History". It should be elevated to "primary topic" status. Thus, Chapter 2 will have three primary topics: "Authority to Plan", "CDP History" and "2020 CDP Plan Process". The Table of Contents and the orange box on Page 2-2 should be updated to reflect this.
22	Dorothy Morris	Agency	PLUS: Office of State Planning Coordination	2 - Introduction	9	Mapping	Congratulations to the City of Rehoboth on a very well written plan which will guide the city through the upcoming years. The area around Rehoboth is developing rapidly and having a plan to guide growth will be an important tool for City. Implementation of the goals and elements set forth in this plan will help the city manage future growth while helping the city retain its the plan contains many sound strategies and plan elements that will work together to manage that growth while helping the city retain the small town charm and rich history. The following suggestions should be considered: Page 2-9 states that the city experienced a nine month delay to address parcel based mapping differences between the city and county records. The city should expand this section to provide a brief summary of the issue, the steps that have been taken to rectify the situation, and any additional steps that remain to ensure the issue is fully addressed.
23	Wyn Achenbaum	Public	62 Columbia Avenue	2 - Introduction	11	Surveys	It needs to be pointed out that, while the Community Survey was intended for City residents only, a significant number of the respondents to the Community Survey revealed themselves to live beyond City limits, thereby skewing the results. (Future surveys need to differentiate between City folks -- including those who own homes here but whose primary residence is elsewhere -- and those who live locally but beyond city limits. And surveys of residents should not be publicized via media likely to reach non-residents.) Consider a multiple choice question offering "within the city" "North Shores or Henlopen Acres" "other 19971" "19958" "19966" and "other" as choices, and asking them to fill in a zipcode. Then cross-tabulate. In the same vein, future surveys to be used for decision-making need to be developed by someone with professional experience in survey design; likely a retiree can be found locally.

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24	Wyn Achenbaum	Public	62 Columbia Avenue	2 - Introduction			Title 22, Section 702(b) of Delaware Code ends with these words: "in the judgment of the municipality, best promotes the health, safety, prosperity and general public welfare of the jurisdiction's residents." And the fact that that sentence begins with "The comprehensive plan for municipalities of greater than 2,000 population shall also contain ..." likely doesn't mean that the City is excluded from prioritizing the health, safety, prosperity and general public welfare of the jurisdiction's residents. It isn't until page 1-7 that the CDP mentions that the City under discussion is a single square mile. <ul style="list-style-type: none"> • Our small size and our status as an island (off another island, created by the Delaware Canal), are defining factors. • We share that east-of-the-1.rR-Canal island with a state park, 2 named communities to our north and two to the south (DB, IB), and some non-municipal land (sometimes said to be forgotten, at least in terms of not receiving certain municipal services). • We have just 3 access points - 1 from the mainland: Rehoboth Avenue and two from the "Forgotten Mile," State Road and Bayard Avenue. Just 3. The vast majority of those arriving and leaving utilize Rehoboth Avenue. It seems to me that the fact of our size, and our most recent population data, 1 2 belong up front. 1 I think I recall seeing initial 2020 Census data I found puzzling: a year-round population considerably lower than what most of us carry in our heads. 2 Estimates (along with their sources) of the summer population- broken out by owneroccupied residences, rental houses and condos, hotel rooms, day-visitors - on holidays and peak weeks, and on peak day and peak hour, would be very helpful perspective for a wide variety of purposes.
25	Jim Ellison	City	Planning Commission	3 - Community Character & Profile	2	Principal Topics	The orange box should list only the primary topics in the chapter: "Community Character", "City Government & Community Organizations", and "Community Profile". The Table of Contents correctly describes this chapter.
26	Susan Gay	City	Board of Commissioners	3 - Community Character & Profile	13	Country Club Estates	The descriptive paragraph and the map that is on page 3-13 of the Plan are wrong. First, it includes Scarborough Ave Extended and the school. Secondly, it includes the commercial properties all along Rehoboth Avenue up to Scarborough and Scarborough Village. CCE does not include commercial section, Scarborough Extended, the school and the condos of Scarborough Village. [Suggested description/map update] Country Club Estates is generally bounded by Scarborough Avenue to the east, the western finger of Silver Lake and the Schoolvue neighborhood to the south, State Road to the west, and the Scarborough Village condominium complex to the north.
27	Susan Gay	City	Board of Commissioners	3 - Community Character & Profile	14	Grove/Camp Meeting Area	There are no trailers! Haven't been in years. I'm also not sure that the variety of styles is any more than in any other neighborhood! I have always heard this area referred to as the Encampment Grounds. It didn't think it included anything north of Rehoboth Ave, certainly not Sussex St. Also, Jones Lane (a dead-end street added about 2010 is not shown here.) So, I think the map below is inaccurate as well.
28	Wyn Achenbaum	Public	62 Columbia Avenue	3 - Community Character & Profile	21	City Boards & Commissions	The members of the other City Boards and Commissions are all appointed by the Board of Commissioners for staggered three-year terms. The City's Boards and Commissions generally
29	Susan Gay	City	Board of Commissioners	3 - Community Character & Profile	23	Trees & Green Infrastructure Committee	Delete third bullet regarding 40% canopy coverage - no longer accurate.
30	Wyn Achenbaum	Public	62 Columbia Avenue	3 - Community Character & Profile	26	Parking	interesting to note that the Parking department was specifically told by PW not to comment on any parking issues in the CST application other than the fire lanes [old driveway cuts] out front. No consideration of handicapped parking, or the need for parking spaces for a 25,000sf complex, or for theaters buildings seating 300 people and requiring staff, all likely to arrive by car. Where is this responsibility?
31	Hunter Davis Ellison	City	Planning Commission	3 - Community Character & Profile	30	Table 3-2	DELETE. Table 3-2. Population Trends (1990-2019) THE DATA IN THIS TABLE COMES FROM ACS WHILE OTHER TABLES ABOUT THE SAME ISSUE USE DPC DATA. THE DISCREPANCIES BETWEEN THE TWO DATA SOURCES CAUSE UNNECESSARY CONFUSION WITHOUT ADDING ANY INFORMATION OF IMPORTANCE. DELETION WILL ALLOW EDITING OF "SUMMARY OF POPULATION CHANGES" PARAGRAPH ON PAGE 3-33 (SEE BELOW).
32	Hunter Davis Ellison	City	Planning Commission	3 - Community Character & Profile	31	Table 3-3	LEAVE IN BUT EDIT REFERENCES TO IT IN THE TEXT. Table 3-3. Population Projections (2010-2050). TEXT NOW INCLUDES REFERENCE TO THE 19% INCREASE IN THE DECADE PRIOR TO 2020, BUT FOR PLANNING PURPOSES THE TAKEAWAY SHOULD BE THAT GROWTH IN REHOBOTH IS PROJECTED TO SLOW DOWN MORE AND MORE FROM 2020 (i.e., NOW) UNTIL 2050.
33	Hunter Davis Ellison	City	Planning Commission	3 - Community Character & Profile	31	Figure 3-3	DELETE. Figure 3-3. City Population Projections (2010-2050) THIS FIGURE DUPLICATES DATA IN TABLE 3-3.
34	Hunter Davis Ellison	City	Planning Commission	3 - Community Character & Profile	31	Table 3-4	DELETE. Table 3-4. Population Projections—Comparisons (2010-2050) THIS TABLE INCLUDES PROJECTIONS FOR GEORGETOWN, LEWES AND MILTON., THAT HAVE LITTLE RELEVANCE FOR FUTURE LAND USE PLANNING IN RB. ALSO, MUCH OF THE DATA FOR RB, DB, AND HA DUPLICATES OR IS INCONSISTENT WITH DATA IN TABLE 3-2.
35	Hunter Davis Ellison	City	Planning Commission	3 - Community Character & Profile	32	Table 3-5	DELETE. Table 3-5. Sussex County Seasonal Population Projections (2010-2050) HOUSING ISSUES ARE DISCUSSED AT LENGTH AND IN DETAIL IN CHAPTER 5-HOUSING AND ECONOMIC DEVELOPMENT. DO NOT BELIEVE THAT THESE ISSUES NEED TO BE ADDRESSED IN CHAPTER 3 AS WELL, PARTICULARLY SINCE THE DISCUSSION IN CHAPTER 3 FOCUSES ON COUNTY POPULATION CHANGES.
36	Hunter Davis Ellison	City	Planning Commission	3 - Community Character & Profile	33	Summary of Population Data	The numbers for year-round population and seasonal population are estimates. For these categories, the Plan uses data from the Delaware Population Consortium. We note, however, that the American Community Survey estimates the current year-round population of Rehoboth Beach to be smaller (1,400) than the DPC estimate (1,578). Even though the difference may seem insubstantial, the discrepancy could be compounded for future years depending on the rate of growth.
37	Hunter Davis Ellison	City	Planning Commission	3 - Community Character & Profile	33	Summary of Population Data	Seasonal population data must also be considered with care. Based on personal and anecdotal ... [No change in remainder of the section]
38	Hunter Davis Ellison	City	Planning Commission	3 - Community Character & Profile	34	Table 3-6	LEAVE IN BUT EDIT TO INCLUDE HISPANIC/LATINO DATA IN TABLE 3.8. Table 3-6. Racial Composition (2019)
39	Hunter Davis Ellison	City	Planning Commission	3 - Community Character & Profile	34	Table 3-7	LEAVE IN BUT EDIT TO INCLUDE HISPANIC/LATINO DATA IN TABLE 3.8. Table 3-7. Change in City Racial Composition (2000-2019)
40	Hunter Davis Ellison	City	Planning Commission	3 - Community Character & Profile	34	Table 3-8	DELETE. Table 3-8. City Hispanic or Latino Origin (2000-2019) RECOMMEND INCLUDING THIS DATA IN THIS TABLE IN TABLES 3-6 AND 3-7 ABOVE.
41	Carlton Hall	Agency	PLUS: State Historic Preservation Office	3 - Community Character & Profile			The Rehoboth Comprehensive Plan includes a History and Historical Resources sections in Chapter 3. The Delaware SHPO appreciates Rehoboth Beach for addressing preservation in their plan and encourages the City of Rehoboth Beach to pursue listings a proposed Historic District in the National Register of Historic Places. A major benefit of listing is that properties become eligible for financial incentives in the form of federal and state historic preservation tax credits and occasional grants. The SHPO office also encourages the city of Rehoboth to include specifics of when they plan to work on preservation issues.
42	Carlton Hall	Agency	PLUS: State Historic Preservation Office	3 - Community Character & Profile			The Delaware SHPO recommends creating a new Architectural Design Manual and revising the Architectural Review Task Force in the future. The Delaware SHPO also recommends conducting an updated Architectural Survey with structures built in 1972 now meeting minimum age requirement for National Register listing. The Architectural Survey should be conducted by an individual who meets the Secretary of Interior's standards for architectural history.
43	Carlton Hall	Agency	PLUS: State Historic Preservation Office	3 - Community Character & Profile			Note also that the statewide historic preservation plan, Partners in Preservation: Planning for the Future, Delaware's Historic Preservation Plan 2018-2022, is now available online at https://history.delaware.gov/pdfs/2018-2022DelawareSHPOPlan.pdf (single-page version for printing also available). The plan emphasizes partnering to achieve common goals and connecting with other planning efforts. We encourage all municipalities to consider how the goals, strategies and actions outlined in the new plan may support and be coordinated with their local planning efforts.
44	Jim Ellison	City	Planning Commission	4 - Land Use & Annexation	2	Principal Topics	The orange box should list only the primary topics in the chapter: "Planning Environment", "Land Use within City Limits", "City Zoning", "Annexation", and "Intergovernmental Coordination". This is as shown in the Table of Contents and followed in the chapter text.
45	Jim Ellison	City	Planning Commission	4 - Land Use & Annexation	3	PLUS	"Preliminary Land Use Service" should have a 4th level heading.

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46	Jamie Whitehouse	Agency	Sussex County Planning & Zoning Director	4 - Land Use & Annexation	5	Sussex County	The summary of the County's adopted Comp Plan is very thorough. The County's GIS layer on our online map shows the boundaries of all Municipalities and the County has worked to update these to reflect those shown within each Municipality's adopted Comprehensive Plan. The County would wish to re-draw Rehoboth's boundaries once the Comp Plan is adopted to ensure that we have the latest and most accurate data.
47	Jim Ellison	City	Planning Commission	4 - Land Use & Annexation	6	County Growth Areas	Suddenly you have introduced a "black caps underlined" heading that appears nowhere else. You have applied this heading to the three growth areas described on this page. These growth areas are a subset of the "Sussex County Growth Areas" section, and yet the black caps underlined heading would appear to me to be more important than the non-underlined black caps heading of the section. I suggest that the three growth areas have a 4th level heading.
48	Jim Ellison	City	Planning Commission	4 - Land Use & Annexation	8	County Land Development	"Sussex County Land Development" should have a 3rd level heading as in Table of Contents.
49	Wyn Achenbaum	Public	62 Columbia Avenue	4 - Land Use & Annexation	11	Table 4-4	the colors in the key in Table 4-4 don't seem to correspond to the map colors for what will be Map 4 -- check R-1 S and R-1; it may be as simple as moving the "S" from the first line to the 2nd line of the key.
50	Wyn Achenbaum	Public	62 Columbia Avenue	4 - Land Use & Annexation	11	Historical Code Changes	"Since THE adoption of 2010 CDP ..."
51	Dorothy Morris	Agency	PLUS: Office of State Planning Coordination	4 - Land Use & Annexation	11	Historical Code Changes	CERTIFICATION COMMENT: Page 4-11 references table AD4-1 which was not included with the draft. Please ensure that table is included in the final plan or remove the reference.
52	Wyn Achenbaum	Public	62 Columbia Avenue	4 - Land Use & Annexation	11	City Zoning	CH4 needs to speak explicitly to zoning changes that are desired, and to those which are counterproductive; it needs to speak to priorities.
53	Hunter Davis Ellison	City	Planning Commission	4 - Land Use & Annexation	11	Table 4-4	LEAVE IN BUT EDIT. Table 4-4. Zoning Composition THIS TABLE SHOULD BE LABELED TABLE 4-3.
54	Wyn Achenbaum	Public	62 Columbia Avenue	4 - Land Use & Annexation	14	Annexation	My sense is that there is no great demand from within the City to expand our borders. (There may be landowners beyond our borders who would prefer to be within City limits than beyond them, but whether accommodating that preference is a priority for the City is the City's choice.) Rather, the CDP is our shared forum to focus inward, and establish our vision for the City's next 10 years and beyond.
55	Wyn Achenbaum	Public	62 Columbia Avenue	4 - Land Use & Annexation	15	Intergovernmental Coordination	says that property owners can research "Transportation, (e.g., impact studies, non-motorized connectivity, traffic analysis)" is among the "key land development factors for property owners to research further." Really?
56	Jamie Whitehouse	Agency	Sussex County Planning & Zoning Director	4 - Land Use & Annexation	15	Intergovernmental Coordination	The inter-governmental sections are well written. I have no comments to add.
57	Jamie Whitehouse	Agency	Sussex County Planning & Zoning Director	4 - Land Use & Annexation	22	Map 5	The annexation areas shown on the map are very clear and the digital version has very good resolution. The County would request that the final published version of the Comprehensive Plan include a similar or better high resolution version of the plan.
58	Wyn Achenbaum	Public	62 Columbia Avenue	4 - Land Use & Annexation			While we have plenty to offer the upscale visitor, focusing on more-more-more is not going to serve the wide range of Delaware residents and others for whom RB is "their beach." We need to be kid-friendly, to attract the young families.
59	Wyn Achenbaum	Public	62 Columbia Avenue	4 - Land Use & Annexation			Because our city property tax is so low, it is nearly impossible to use our property tax as an incentive for anything. But perhaps some or all redevelopment of lots on Rehoboth A venue must require housing for some number of seasonal employees, or provide some other inducement. Then again, those employees must not come with cars; to the extent that they own cars, those cars must remain in the Park & Ride system.
60	Dorothy Morris	Agency	PLUS: Office of State Planning Coordination	4 - Land Use & Annexation		Map 5	CERTIFICATION COMMENT: Map 5 - Annexation Growth Area shows areas of proposed future annexation. The plan states that the city has no plans to initiate annexation of any property shown on this map, it will entertain petitions from property owners within the identified area for annexation. If a property is annexed, it must be zoned according to the city's Future Land Use map. Map 3, Future Land use, must show the proposed future use for all annexation areas.
61	Jim Ellison	City	Planning Commission	5 - Housing & Economic Development	2	Principal Topics	The Table of Contents is correct, but the orange box is incorrect and the text sections that follow are not correct. The orange box should list: "Housing Inventory", "Affordable, Attainable & Workforce Housing", "Housing Needs Analysis", "Housing Resources", and "Economic Development & Opportunity".
62	Jim Ellison	City	Planning Commission	5 - Housing & Economic Development	2	Housing Inventory	Page 5-2 through 5-8: All of the subjects under "Housing Inventory" should be secondary topics, not 3rd level.
63	Hunter Davis Ellison	City	Planning Commission	5 - Housing & Economic Development	2	Table 5-1	LEAVE IN BUT EDIT. Table 5-1. Housing Units (1970-2019) SUGGEST DELETING DATA FOR 1970 AND 1980 UNLESS THE PURPOSE OF THE TABLE IS TO SHOW THE DRAMATIC INCREASE IN COUNTY HOUSING UNITS SINCE 1970. IN THAT CASE, THE TEXT NEEDS TO BE EDITED TO MAKE THAT POINT.
64	Hunter Davis Ellison	City	Planning Commission	5 - Housing & Economic Development	7	Figure 5-3	QUESTION. Figure 5-3. Median Rental Values (2000-2019) WERE THE 2019 MEDIAN RENTAL VALUES IN DEWEY REALLY HIGHER THAN THE 2019 MEDIAN RENTAL VALUES IN RB?
65	Jim Ellison	City	Planning Commission	5 - Housing & Economic Development	9	Affordable...	Page 5-9 through 5-11: "Affordable, Attainable & Workforce Housing" should be a primary topic, not a secondary. All sections under this primary topic should be secondary topics, not 3rd level.
66	Jim Ellison	City	Planning Commission	5 - Housing & Economic Development	12	Housing Needs Analysis	Page 5-12 through 5-13: "Housing Needs Analysis" should be a primary topic, not a secondary. The two sections under this primary topic should be secondary topics, not 3rd level.
67	Jim Ellison	City	Planning Commission	5 - Housing & Economic Development	14	Housing Resources	"Housing Resources" should be a primary topic not a secondary. The two sections under this primary topic should be secondary topics, not 3rd level, and these should be shown in the Table of Contents.
68	Elyse F. Moore	Public	15 Coventry Road	5 - Housing & Economic Development	16	Economic Characteristics	I am questioning the 100% commercial occupancy. And the overall COVID effects. Were rents lowered to accommodate tenants?

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69	Elyse F. Moore	Public	15 Coventry Road	5 - Housing & Economic Development	20	Economic Development & Opportunity	Reverse the current trend of losing downtown businesses to highway locations.
70	Elyse F. Moore	Public	15 Coventry Road	5 - Housing & Economic Development	20		With the possibility of four new major hotels being developed in the foreseeable future, how will this CDC plan address the additional visitors and all that comes with that: trash removal, pedestrian traffic, restaurant waits. There could be 400 new rooms with an average of 3 people per room. How will that impact evacuation routes?
71	Wyn Achenbaum	Public	62 Columbia Avenue	5 - Housing & Economic Development			We do, however, need workforce housing. First, in order to attract the lifeguards, summer police and other young seasonal workers we need - city employees - and perhaps help to house some summer employees of city businesses; incentivizing the development of affordable housing for them is worthwhile. Our CDP should encourage us to study how best to do that. It may turn out to be unrealistic, but it should be studied and considered. The city would not be foregoing a large amount of property tax revenue. There may also be a place for working family housing.
72	Karen Horton	Agency	PLUS: State Housing Authority	5 - Housing & Economic Development			The City of Rehoboth conducted a comprehensive analysis of the demographic, economic and market trends of their resort community that provide significant challenges to providing affordable housing. As a result, they are seeking to increase the mix of housing types, as well as partnerships to facilitate affordable housing in their community. DSHA supports these efforts and because of the strong challenges outlined by the Town, DSHA also encourages consideration the following strategies that are particularly effective in resort communities: 1) Long-term affordability programs and tools to preserve public investment and to ensure a sustainable affordable housing stock. 2) The provision of employee-occupied rental units within commercial and public facilities. 3) Coordination with other area beach towns to identify and implement regional strategies for addressing affordable housing needs.
73	Barry Brandt	Public	316 Hickman Street	6 - Transportation & Infrastructure			I congratulate you on this latest revision of the Comprehensive Development Plan. As President of Country Club Estates Property Owners Association, we previously provided commentary on earlier versions, and we thank you for incorporating the changes we recommended. I would like to add my own comments as well. I believe Chapter 6 has too much information in the way of definitions. The first 19 pages of chapter 6 are stating facts about various transportation topics. More effort needs to be given to the ever-increasing traffic problems the city will be seeing now and in the next ten years. These problems are traffic volume, traffic speed on the side streets and parking. Yet when I look at the action items on Page 6-20, I see only one that touches on the need to hire a consultant to review current traffic patterns. It seems like this major problem in the city is only being ever so slightly addressed. Traffic (volume and speed) and parking are an ever-increasing problem. To not add more definitive action items addressing these problems is a shortfall in the CDP. Please consider more definitive action items to address: Traffic volume; Traffic speed (including traffic calming methods); Parking (to include shuttle studies)
74	Wyn Achenbaum	Public	62 Columbia Avenue	6 - Transportation & Infrastructure	2	Introduction paragraph 3	"As outlined in the 2010 CDP and still relevant for this 2020 update, the City recognizes the critical importance of managing traffic, particularly during peak periods; minimizing traffic congestion; and reducing conflicts between pedestrians, bicyclists, and motorized vehicles." What are we doing about it?
75	Wyn Achenbaum	Public	62 Columbia Avenue	6 - Transportation & Infrastructure	2	Introduction paragraph 1	"a major four-to-six-lane highway" omit the hyphen after "to" to read "four- to six-lane" In the same paragraph, omit "/Second Street" which is only north of Rehoboth Avenue.
76	Jim Ellison	City	Planning Commission	6 - Transportation & Infrastructure	2	Principal Topics	The orange box should list only the primary topics: "Modes of Transportation" and "Utilities & Infrastructure". In this one instance, I could see listing the five secondary topics under "Utilities...." because they are important and distinct. If you list them in the orange box, they should be indented under "Utilities....". In the Table of Contents, the final item under Chapter 6 ("Positions, Goals & Action Items) should be indented under "Utilities...".
77	Bill Brockenbrough	Agency	PLUS: DeIDOT	6 - Transportation & Infrastructure	3	DeIDOT Roadways	On page 6-1, the DeIDOT's Capital Transportation Program (CTP) is referred to with the correct initials but an incorrect title.
78	Wyn Achenbaum	Public	62 Columbia Avenue	6 - Transportation & Infrastructure	3	DeIDOT Roadways	What is the relevance of even mentioning the AADT -- Average Annual Daily Traffic -- data? What matters here is the peak season. A project applicant got away with it, but it is not the relevant measure in Rehoboth Beach. "As more detailed data becomes available, the City should use this information in its planning processes." We must set in motion obtaining the relevant data -- our arterial during our peak months, weeks, days, time-slots. What we care about is vehicles per minute, and how much of the day traffic crawls on our streets. We want the visitor experience and the resident experience to be one they want to repeat, not one they want to avoid. Please put a serious traffic study high on the priority list.
79	Wyn Achenbaum	Public	62 Columbia Avenue	6 - Transportation & Infrastructure	4	Lake Avenue Streetscape Improvements	"It included a minor realignment of the streets and intersections to control traffic movements and shorten pedestrian crossings more safely." Italicized words seem awkward
80	Bill Brockenbrough	Agency	PLUS: DeIDOT	6 - Transportation & Infrastructure	4	Wilmington/Baltimore Ave Streetscape Project	On pages 6-4 and 6-5, there are technical inaccuracies in the discussion of the Wilmington/Baltimore Avenues Streetscape Project. The City is urged to contact Mr. Michael Hahn (Michael.C.Hahn@delaware.gov or 302-760-2131) or Mr. Todd Pryor (Todd.Pryor@delaware.gov or 302-760-2112), both of DeIDOT's Local Systems Improvement Section for more specific information.
81	Jared Kauffman	Agency	PLUS: DART	6 - Transportation & Infrastructure	6	Public Transportation	The number of fixed routes needs to be revised from 64 to 60: 34 in New Castle; 11 in Kent (210 is considered Kent Service); Five routes that serve Sussex year-round (201,204,206,212, and215); Four intercounty; Three flex (currently only operating the 903 as we continue to pilot the DART Connect service, which itself is not considered a fixed-route service); And, three routes that only operate seasonally (203,208, and 305). All other year-round Sussex routes, except for the 212, receive increased service levels during the Beach Bus season. The statement about seeing an increase in ridership needs more context. While we were seeing a slight, but steady increase in ridership before the pandemic. Since the initial drop in ridership in2020, we have seen an increase in ridership but plateauing at about 500/oto pre-pandemic levels across the entire state.
82	Wyn Achenbaum	Public	62 Columbia Avenue	6 - Transportation & Infrastructure	7	DART Paratransit	might be worth noting (if it is true) that all of RB is within the "ADA Trip" zone.
83	Wyn Achenbaum	Public	62 Columbia Avenue	6 - Transportation & Infrastructure	7	DART Bus	"north of Rehoboth Avenue" is not a good description of the location of the DART Park & Ride.
84	Wyn Achenbaum	Public	62 Columbia Avenue	6 - Transportation & Infrastructure	7	DART Bus	do DART buses transport bikes?
85	Jared Kauffman	Agency	PLUS: DART	6 - Transportation & Infrastructure	7	DART Bus	The Route 201 is only named the Beach Bus route during Beach Bus season. The year-round service is just considered the Route 201.
86	Jared Kauffman	Agency	PLUS: DART	6 - Transportation & Infrastructure	7	DART Bus	While the 201 Beach Bus service operates seven days a week, the year-round 201 service only operates Monday through Saturday.
87	Jared Kauffman	Agency	PLUS: DART	6 - Transportation & Infrastructure	7	DART Bus	An improved description of the Route 201 is needed. Clarification is needed between the difference between Beach Bus service and year-round service, including general dates, and difference in service levels. Additionally, a description of the rider demographics, needs, and travel behaviors should be provided.
88	Wyn Achenbaum	Public	62 Columbia Avenue	6 - Transportation & Infrastructure	8		Should it speak to the residential neighborhoods lacking the lighting that prevails in the commercial districts?
89	Wyn Achenbaum	Public	62 Columbia Avenue	6 - Transportation & Infrastructure	9	Parking	needs to be updated to the new parking requirements.
90	Wyn Achenbaum	Public	62 Columbia Avenue	6 - Transportation & Infrastructure	9	Parking	Need it say something about handicap parking spaces, 30 minute spaces, van spaces

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No.	Name	Comment Category	Address or Affiliation	Chapter	Page	Paragraph	Comment
91	Wyn Achenbaum	Public	62 Columbia Avenue	6 - Transportation & Infrastructure	9	Parking	Update the first 2 paragraphs: "All non-metered areas of the City require a parking permit daily from 10 am-5 pm beginning the Friday before Memorial Day through the second Sunday after Labor Day. Parking vehicles longer than 22 '3" in length or wider than 8' 1" in width is restricted. Parking meters require payment from 10 am- 10 pm beginning the Friday before Memorial Day through the second Sunday after Labor Day."
92	Wyn Achenbaum	Public	62 Columbia Avenue	6 - Transportation & Infrastructure	9	Pedestrian Infrastructure	Pedestrian infrastructure is a fme goal, and it is often in conflict with outdoor dining on the public sidewalks. Allowing restaurants to take over the sidewalks has some downside. [also relevant to action item f on page 5-20.]
93	Wyn Achenbaum	Public	62 Columbia Avenue	6 - Transportation & Infrastructure	9	Parking	Somewhere on that page, there should be mention of handicap parking spaces.
94	Wyn Achenbaum	Public	62 Columbia Avenue	6 - Transportation & Infrastructure	10	Bicycle Infrastructure	The notion that the majority of our streets are safe for children on bicycles might be fme for 9 months of the year, but most of the through streets (and many of the ocean-block streets) are not low "traffic stress" -- particularly near the traffic circle and the rest of Rehoboth Avenue.
95	Wyn Achenbaum	Public	62 Columbia Avenue	6 - Transportation & Infrastructure	13	City Pedestrian & Bicycle Plan	the final bullet is pretty much irrelevant within the City. Even the Boardwalk is only available until 1 Oam, and that is likely to be eliminated for bicyclists. We ought to have in our plans that if the Boardwalk ever has to be replaced -- as after a major storm -- it be built wide enough to accommodate bicycles and walkers. Yes, cross-traffic will be a problem, but if bikers are to be safe, they need a way to move from one end of town to the other. (Put them closest to the dune fence, where people leaving the beach will be able to see the bikers coming as they approach the boardwalk, and where people headed for the beach will already have had to deal with pedestrians walking the boardwalk, so won't be oblivious to the need to look both ways.)
96	Wyn Achenbaum	Public	62 Columbia Avenue	6 - Transportation & Infrastructure	13		Rebuilding the boardwalk: see 1914, 1962, 1992 -- and those were largely before the multiple effects of climate change became an issue.
97	Wyn Achenbaum	Public	62 Columbia Avenue	6 - Transportation & Infrastructure	13	City Pedestrian & Bicycle Plan	"As transportation systems developed over time, they were designed for motor vehicles as the predominANT mode of transportation."
98	Wyn Achenbaum	Public	62 Columbia Avenue	6 - Transportation & Infrastructure	13	City Pedestrian & Bicycle Plan	"In Rehoboth, [omit this: unlike many other jurisdictions,] bicycles and pedestrians make up a significantly larger part of the demand for space than in many other cities."
99	Wyn Achenbaum	Public	62 Columbia Avenue	6 - Transportation & Infrastructure	14	Junction & Breakwater Trail Extension	This sentence is awkward and maybe not precise: "Work on the trail extension began in March 2021 and includes connection an asphalt trail from Canal Street to Rehoboth A venue, and the development of a two-way buffered bicycle lanes along Rehoboth A venue to Grove Park."
100	Wyn Achenbaum	Public	62 Columbia Avenue	6 - Transportation & Infrastructure	14	Junction & Breakwater Trail Extension	should probably mention somewhere that restrooms are available at Grove Park.
101	Wyn Achenbaum	Public	62 Columbia Avenue	6 - Transportation & Infrastructure	14	Gordons Pond Trail	Gordons Pond- something that says that together with Junction-Breakwater Trail, forms a loop that brings bikers and hikers through RB's residential neighborhoods.
102	Wyn Achenbaum	Public	62 Columbia Avenue	6 - Transportation & Infrastructure	14	Gordons Pond Trail	The Gordons Pond parking area is not located in the City of Rehoboth Beach. Perhaps more accurate to say that it is within CHSP, beyond North Shores, accessed via Ocean Drive.
103	Wyn Achenbaum	Public	62 Columbia Avenue	6 - Transportation & Infrastructure	14	Gordons Pond Trail	Parking at Gordon's Pond-- before Biden heliport -- was more like 400 than 500 spaces, based on Google satellite view
104	Wyn Achenbaum	Public	62 Columbia Avenue	6 - Transportation & Infrastructure	15	Long Range Transpo. Plan	Delaware's Long Range Transportation Plan should be moved to an Appendix, and other items in that section should be considered for moving to an Appendix. They aren't part ofRB's Plan; they're nice reference.
105	Wyn Achenbaum	Public	62 Columbia Avenue	6 - Transportation & Infrastructure	19		Page 6-19 is repeated on page 8-9. It first appeared on page 1-11
106	Gary Klacik	Public	Columbia Avenue	6 - Transportation & Infrastructure	20	Action Item H	Section 7.3 Access Alternatives of the 2010 CDP, (page 69), specifically recommended traffic calming on Columbia Avenue, Henlopen Avenue, State Road and Bayard Avenue. Paragraph 7.32.c.(1), (page 71), recommended traffic calming safety improvements to Columbia Avenue as a priority. The need for this traffic calming is still true today. Columbia and Henlopen serve not only the City but also Henlopen Acres, North Shores and Gordon Pond State Park and therefore Columbia and Henlopen are experiencing increased traffic not only from within the City, but also from increased activity and growth occurring in those communities and the use of the Park. Considerable progress has been made on other initiatives proposed in the 2010 CDP - the construction of the Canal Dock, the implementation of Wayfinding Signage,and the Baltimore & Wilmington Avenues Streetscape Study. Traffic Calming has not progressed as far. In the current draft 2020 CDP, Chapter 6 TRANSPORTATION - Action Item h) states: "Consider contracting with a traffic consultant to review traffic patterns and recommend changes to implement a traffic management program that includes traffic calming infrastructure, ...". I would urge the Commission to adopt a more affirmative statement on the need for traffic calming and not just make it a consideration. A Professional Traffic Engineer with experience in traffic calming should be retained by City to study the entire length of the four streets and make recommendations. (The City should not try to undertake traffic calming improvements by itself. An experienced professional traffic engineer is required.) I request a traffic calming study of Columbia, Henlopen, State and Bayard be specifically listed as a Action Item in the Transportation chapter of the 2020 CDP.
107	K. Claire Quinlan	Agency	PLUS: DNREC	6 - Transportation & Infrastructure	21	Regulations & Assessments	Starting on page 6-2l,the draft comprehensive plan addresses drinking water demand, capacity, source, aquifers, water treatment, water distribution and maintenance. The report indicates that neither perfluorooctane nor sulfonate/perfluorooctanoic acid were detected in drinking water within the past five years. Consider also addressing PFOS (Perfluorooctanesulfonic acid), since PFOS is an emerging issue of concern in drinking water quality. For more information about PFOS in groundwater, please visit https://dnrec.alpha.delaware.gov/waste-hazardous/remediation/pfas/ or contact the DNREC Division of Water at302-739-9949.
108	Jamie Whitehouse	Agency	Sussex County Planning & Zoning Director	6 - Transportation & Infrastructure	26	Water Initiatives	There was an additional comment from County Engineering - the water utilities Section does not mention the 2nd water interconnection on East Lake Drive and the sewer utilities connection could mention the partial bidirectional connect of parts of west Rehoboth.
109	Tom Roth	Agency	Town of Henlopen Acres Town Manager	6 - Transportation & Infrastructure	26	Water Initiatives	Pages 144, 145 discuss Rehoboth's water system. There's no mention of the RB/HA interconnect project, that was completed in 2021.
110	K. Claire Quinlan	Agency	PLUS: DNREC	6 - Transportation & Infrastructure	29	Wastewater Initiatives	The draft comprehensive plan addresses wastewater starting on page 6-29. Onpage 6-31 the draft comprehensive plan describes preliminary engineering reports from 2012 that propose possible upgrades. The document later describes that the upgrades were completed on page 6-32. It is recommended to describe the completed projects first so that the reader has a better understanding that the wastewater treatment system is up-todate and maintained. This can be done by reversing the bullet list from newest to oldest. For more information about wastewater treatment and National Pollutant Discharge Elimination System permitting, please visit https://dnrec.alpha.delaware.gov/water/surface-water/ or contact the DNREC Division of Water, Surface Water Discharges Section at302-739-9946.
111	Wyn Achenbaum	Public	62 Columbia Avenue	6 - Transportation & Infrastructure	31	Wastewater Initiatives	Ocean Outfall Project paragraph needs to associate Deauville Beach with "public access parking areas at the beach near Henlopen A venue"
112	K. Claire Quinlan	Agency	PLUS: DNREC	6 - Transportation & Infrastructure	34	TMDL	On page 6-34,the draft comprehensive plan addresses Total Maximum Daily Loads (TMDLs) and refers to a Pollution Control Strategy (PCS). DNREC reviewers recommend referencing the specific Pollution Control Strategy to be the Inland Bays Pollution Control Strategy. For more information about the Inland Bays Pollution Control Strategies, please visit dnrec BPCS 101408.pdf or contact the DNREC Division of Watershed Stewardship, Watershed Assessment S ection at 3 02 - 7 39 - 9939 .

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113	K. Claire Quinlan	Agency	PLUS: DNREC	6 - Transportation & Infrastructure	35	MS4 and Stormwater Utility	Stormwater management is addressed starting on page 6-35. The draft comprehensive plan discusses the value of introducing a future stormwater utility. Such a program could resolve future costs associated with stormwater infrastructure, monitoring, and maintenance. The draft comprehensive plan also addresses the concept of a Municipal Separate Storm Sewer System (MS4). The City of Rehoboth is not currently required to hold an MS4 permit under the National Pollutant Discharge Elimination System. The 2020 census data may trigger future changes to MS4 permitting requirements for the City of Rehoboth. For more information about MS4s in Delaware, please visit https://dnrec.alpha.delaware.gov/water/surface-water/npdes/municipal-storm-sewers/ or contact the DNREC Division of Water, Surface Water Discharges Section at 302-739-9946.
114	Wyn Achenbaum	Public	62 Columbia Avenue	6 - Transportation & Infrastructure	37	Scarborough Ave Ext Rain Garden	"western most" needs a hyphen or simply to be "westernmost"
115	Hunter Davis Ellison	City	Planning Commission	6 - Transportation & Infrastructure			THIS CHAPTER IS OVER 40 PAGES LONG WITH 16 DENSELY WRITTEN PAGES AND 10 TABLES OF DATA AND STATISTICS DEVOTED EXCLUSIVELY TO CURRENT WATER DEMAND, CURRENT WATER TREATMENT, AND CURRENT WASTEWATER TREATMENT. HOWEVER, VERY LITTLE INFORMATION IS INCLUDED IN THE TEXT OR TABLES REGARDING FUTURE INFRASTRUCTURE NEEDS IN THESE AREAS. RECOMMEND THAT THIS MATERIAL BE EDITED SIGNIFICANTLY TO REDUCE ITS LENGTH AND LEVEL OF DETAIL.
116	Wyn Achenbaum	Public	62 Columbia Avenue	6 - Transportation & Infrastructure			The preferences of those who live beyond our borders and only venture into town, say, once or twice a week should not be permitted to override or ignore the constraints of one square mile with 3 access points. As the 2010 CDP pointed out (3 times) and Draft #5 says once, "Access for people should not be inhibited; rather access by people must be increased while traffic is decreased. In other words, Rehoboth will accept more people, it will not accept more cars."
117	Wyn Achenbaum	Public	62 Columbia Avenue	6 - Transportation & Infrastructure			But realistically, unless we're going to charge non-resident motor vehicles a toll or a daily congestion fee, the existing buildings and attractions will continue to attract cars. And since we're the gateway to a state park, and to taxpayer-renourished beaches, we aren't going to reduce or maintain the existing number of cars without serious measures and firmness in enforcing our Code.
118	Wyn Achenbaum	Public	62 Columbia Avenue	6 - Transportation & Infrastructure			So we need to take other measures to insure that people have access. Bicycles, scooters are part of that; but they, too, take up space, both when they're moving- one must move into another lane to pass a bicyclist - and when they're parked.
119	Wyn Achenbaum	Public	62 Columbia Avenue	6 - Transportation & Infrastructure			Sidewalks need to accommodate pedestrians first; and pedestrians here may have beach carts, or child or pet strollers, or little ones on their foot-powered scooters. Where there aren't sidewalks, they will be on the street; gravel is not particularly foot-friendly or wheel-friendly.
120	Wyn Achenbaum	Public	62 Columbia Avenue	6 - Transportation & Infrastructure			We have enough on our plate to maintain and upgrade our existing infrastructure. This month we are reminded of the viciousness of a storm which hit RB 60 years ago, and the damage it caused to the structures at our oceanfront. In an earlier storm we were forced to sell off lots from a park in order to pay to repair our boardwalk.
121	Wyn Achenbaum	Public	62 Columbia Avenue	6 - Transportation & Infrastructure			I believe the CDP needs to call for gathering some information, and make it publicly available, with plans to include it in the 2025 CDP Update: 1. A traffic study which collects detailed data focusing on the peak weeks, both on weekdays and on weekends, by 15-minute segment, in various key places. That Traffic Study should also note the bicycle, scooter and motorcycle traffic. (We've had people using "average day" traffic counts as if they meant something for important decisions.) 2. A parking study which counts the number of parking spaces, by block and parking lot, and provides, year by year, week by week, and days of the week, the revenue from the parking spaces on each block, and/or a measure of the number of hours the spaces on each block are occupied. Part of the goal is to get to a % occupancy rate for each block. (One of the uses of this data is that it may play into meter pricing; one expert says 85% occupancy is the sweet spot.) But parking data has many uses, and we ought to know the facts. a. Metered spaces b. Street spaces on residential streets with sidewalks c. Street spaces on residential streets without sidewalks d. Spaces in city-owned parking lots e. Off-street parking privately owned
122	Bill Brockenbrough	Agency	PLUS: DeIDOT	6 - Transportation & Infrastructure			DeIDOT recommends that consideration be given to limiting vehicle access on the loop around the Rehoboth Avenue bandstand to transit vehicles and vehicles that are loading and unloading.
123	Jared Kauffman	Agency	PLUS: DART	6 - Transportation & Infrastructure			Please provide a description of the bandstand stop, and the general challenges and obstacles for DART at that stop
124	Jared Kauffman	Agency	PLUS: DART	6 - Transportation & Infrastructure			If the Town has a vision of improved DART service, it should be mentioned with defined goals and strategies to meet that vision.
125	Jared Kauffman	Agency	PLUS: DART	6 - Transportation & Infrastructure			It is suggested to include walkable friendly design and concepts within the economic development, housing, and land use sections, in addition to the transportation section, since walkability affects and is affected by these topics, and to note that encouraging walkability goes beyond simply providing walkable infrastructure, which includes directness and surrounding human-scaled aesthetics. For example, while the land use goals and action items mentions the need to accommodate a pedestrian-oriented character, it is suggested to elaborate within the land use section itself about what is meant by pedestrian-orientation, and how land use could be enhance pedestrian travel.
126	Jim Ellison	City	Planning Commission	7 - Environmental Protection	2	Principal Topics	: The orange box should list these primary topics: "Water Resources", "Climate Change", "Land Resources", and "Air Resources".
127	Jim Ellison	City	Planning Commission	7 - Environmental Protection	2	Ocean & Beach	Page 7-2 and 7-3: The sub-topics under "Ocean and Beach" should be 4th level, and thus should not be in bold text. Same goes for entries on pages 7-5, 7-7, 7-20, and 7-23.
128	K. Claire Quinlan	Agency	PLUS: DNREC	7 - Environmental Protection	2	Beach Preservation Act	On page 7 -2, under Beach Preservation Act, it says that "No construction may take place seaward of the building line without a Coastal Construction Permit or Coastal Construction Letter of Approval from DNREC." Please note the following corrections: "No construction may take place seaward of the building line or landward of the building line within the regulated area without a Coastal Construction Permit or Coastal Construction Letter of Approval from DNREC." The DNREC Shoreline and Waterway Management Section not only requires approval seaward of the building line but also landward within DNREC's regulated area, which is defined as "the specific area within the defined beach that the Department is directed to regulate construction to preserve dunes and to reduce property damage." Additionally, "The regulated area shall be from the seaward edge of the beach as defined to the landward edge of the third buildable lot in from the mean high-water line."
129	K. Claire Quinlan	Agency	PLUS: DNREC	7 - Environmental Protection	5	Canal Dredging	On Page 7-5, under CanalDredging, the draft comprehensive plan states that, "In 2016, the estimated cost to complete the Lewes-Rehoboth Canal dredging was more than\$2.4 million." To avoid confusion regarding the dates of the latest statewide dredging prioritization efforts, the following addition is recommended: *In2020,the estimated cost to complete the Lewes-Rehoboth Canal dredging was ..." For more information on coastal construction in Delaware, please visit https://dnrec.alpha.delaware.gov/watershedstewardship/beaches/coastal-constructiorV or contact the DNREC Division of Watershed Stewardship, Shoreline and Waterway Management Section, at 302-7 39 -9921.
130	Wyn Achenbaum	Public	62 Columbia Avenue	7 - Environmental Protection	8	Floodplains	Floodplains -- this needs a date on it.
131	K. Claire Quinlan	Agency	PLUS: DNREC	7 - Environmental Protection	10	Wetlands	Wetland areas and buffers are addressed on pages 7-10. The draft plan states that "DNREC recommends instituting a 100-foot upland buffer width, requiring plantings of native woody or herbaceous plant species, from all USACE regulated/approved and State regulated wetlands." Consider making the following changes: DNREC recommends instituting a 100-foot upland buffer width, requiring plantings of native woody or herbaceous plant species from all USACE regulated/approved and State regulated wetlands.
132	K. Claire Quinlan	Agency	PLUS: DNREC	7 - Environmental Protection	12	Climate Change	Climate change is well addressed starting on page 7-12. The draft comprehensive plan includes reference to the new Delaware Climate Action Plan and addresses the three main concerns associated with climate change: increased heavy precipitation events; temperature rise; and sea level rise.
133	Wyn Achenbaum	Public	62 Columbia Avenue	7 - Environmental Protection	16	Forests, Woodlands & Trees	the Trees section should speak to the role tree root systems play in dealing with stormwater runoff and groundwater. [it gets a mention on 7-18]

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134	Wyn Achenbaum	Public	62 Columbia Avenue	7 - Environmental Protection	20	Beach & Boardwalk	"The City is located in the Mid-Atlantic and is host to the largest beach in the State." Is ours larger than CHSP's ocean beach?
135	Wyn Achenbaum	Public	62 Columbia Avenue	7 - Environmental Protection	21	Table 7-2	table 7-2: Deauville "paid parking"
136	K. Claire Quinlan	Agency	PLUS: DNREC	7 - Environmental Protection	25	Greenhouse Gases	The State's Weatherization Assistance Program is mentioned on page 7-25. It is recommended to include specific action items for both energy efficiency and renewable energy infrastructure. Examples are provided below: --Conduct a comprehensive planning effort in sustainable energy, with a specific goal to reduce energy consumption by implementing energy efficiency measures in City operations, including buildings and street lighting. Energy efficiency upgrades may be eligible for funding through the Energy Efficiency Investment Fund, provided through the DNREC Division of climate, coastal, & Energy, to help commercial and industrial customers replace aging or inefficient equipment and systems with energy efficient alternatives (https://dnrec.alpha.delaware.gov/climate-coastal-energy/energy-efficiency/energy-efficiency-investment-fund/). Grants are also provided through the Green Energy Program, which include several different types of green energy funding programs from the state's major electric utilities (www.de.gov/greenenergy). Energy efficiency upgrades, such as a street lighting project, may be eligible for funding assistance through Energize Delaware (https://www.energizedelaware.org). --As part of the sustainability planning effort, utilize renewable energy infrastructure, such as solar and wind, to further reduce pollution. Review all codes to ensure that no barriers exist to solar deployment on rooftops or in ground curbs. --Consider adopting energy efficiency measures in building design and redevelopment to help cut energy costs and make homes more comfortable for occupants. --Adopt a mechanism to provide information on the Weatherization Assistance Program to customers who are having trouble paying utility bills. (https://dnrec.atpna.comunities/weatherization/).
137	Jim Ellison	City	Planning Commission	7 - Environmental Protection	27		Heading should reflect chapter title: "Environmental Protection".
138	K. Claire Quinlan	Agency	PLUS: DNREC	7 - Environmental Protection	27	Action Item I	The draft comprehensive plan also addresses electric vehicles. On page 7-27, "Action Items" include transitioning the city's fleet vehicles "when possible." It is recommended to establish milestones as to when this could be completed (i.e. 20% of the fleet electrified by 2025, etc.) as well as including a vehicle replacement schedule. Additionally, the plan calls for identifying appropriate locations for electric vehicle charging stations, seeking funding for installation. The plan mentions potential funding sources for Level 2 electric vehicle charging equipment provided by the state. The state anticipates changes to its program offerings as well as the funding opportunities. Please contact Breanne Preisen by email at breanne.preisen@delaware.gov or by phone at 302-735-3366 for more information.
139	Hunter Davis Ellison	City	Planning Commission	7 - Environmental Protection			NO CHANGES RECOMMENDED.
140	Wyn Achenbaum	Public	62 Columbia Avenue	7 - Environmental Protection			How are we moving, in this document, to increase resiliency? Might we move toward a little less coverage for future development within our commercial districts? (It is worth asking who benefits from more coverage, and who loses something they think they're entitled to.)
141	K. Claire Quinlan	Agency	PLUS: DNREC	7 - Environmental Protection			The city should develop and adopt an ordinance requiring a 100-foot vegetated buffer zone (not a setback) from all wetlands, waterbodies and waterways for new development, where practicable.
142	K. Claire Quinlan	Agency	PLUS: DNREC	7 - Environmental Protection			Vegetated buffers are not equivalent to setbacks, as residential lots, walkways, and stormwater management facilities should not be contained within the vegetated buffer zone. Vegetated buffer zones should be left undisturbed during construction and should be identified outside of the Limit of Disturbance (LOD) on the engineering plans. In some instances, stormwater outfalls, conveyances, and emergency spillways may cross through these zones, and will require temporary disturbance during construction.
143	K. Claire Quinlan	Agency	PLUS: DNREC	7 - Environmental Protection			Designate all vegetated buffers as un-subdivided open space. No portion of any building lot should be within the buffer. Signage should be installed at the edge and within the buffer zones to deter residents from encroaching into these common areas.
144	K. Claire Quinlan	Agency	PLUS: DNREC	7 - Environmental Protection			Buffer zones should be planted exclusively with native trees and plants, as indicated in the comprehensive plan. Native plants are well-suited to our climate and require limited maintenance. They also provide an increasingly important role in the survival of native birds and beneficial insects whose habitat is shrinking due to development and climate change.
145	Edie & Jim Herron	Public	36 Park Avenue	8 - Implementation	2	Last	On page 8-2, in the second line of the last paragraph, there is a typo. The text says "...completed by by July 203". [I assume that it should read "...completed by July 2030"]
146	Wyn Achenbaum	Public	62 Columbia Avenue	8 - Implementation	2	Plan Update	"July 203" should be "July 2030" -- The state says "at least every 5 years"
147	Wyn Achenbaum	Public	62 Columbia Avenue	8 - Implementation	2	Plan Update	It seems to me that if this is the 2020 CDP, the next must be in 2030, and we ought to do the update in 2025.
148	Wyn Achenbaum	Public	62 Columbia Avenue	8 - Implementation	9	Goal #1 (Transp.)	"Adopt a clear, well defined Traffic Management System which will address traffic congestion at peak periods and identify alternative modes of transportation to include motorized and nonmotorized." Would be wise to have DATA in hand before starting the process, so that we can determine whether the "clear, well defined Traffic Management System" turns out to make a difference, or if the situation is simply out of control.
149	Wyn Achenbaum	Public	62 Columbia Avenue	8 - Implementation	9	Action Item I	"Strengthen coordination efforts and partnerships between the public and private sectors to help solve infrastructure needs and other critical problems." Does this force us into accepting proposals made by private entities that relate to critical problems?
150	Jim Ellison	City	Planning Commission	AB - Resources & References	3	Land Use	Chapter 11 is actually Chapter 4.
151	Wyn Achenbaum	Public	62 Columbia Avenue	AB - Resources & References	10	Sussex County Tax Exemptions	"The County offers tax exemptions to qualifying residents that are disabled or over the age of 65." suggest "who" rather than "that"; and a mention of the School tax exemption for qualifying residents (which I have in mind are provided by the State).
152	Wyn Achenbaum	Public	62 Columbia Avenue	AB - Resources & References	21	Table AB5-1	table AB5-1. Where are the 204 professional ... waste management people? Where do hotel and restaurant employees show up in this? just part of the 44? Where are the manufacturing people? Top employers Grotto, Atlantic Sands, Boardwalk Plaza together employ 139+ 115=254, far more than "accommodation and food services"
153	Wyn Achenbaum	Public	62 Columbia Avenue	AB - Resources & References	21	Table AB5-3	table AB5-3 -- add a very narrow column after the 2nd column, to make the table clearer, and add a total (78) to tie to table AB5-2. Is this full time employees, or full time equivalents? Does the CDP report the seasonal positions somewhere?
154	Wyn Achenbaum	Public	62 Columbia Avenue	AC - Community Engagement	1		Does this need to be included?? "A new free-standing public restroom building was incorporated into the draft Gerar Park Master Plan, which proposed a redesign of the easternmost end of Lake Gerar and incorporated a larger ADA compliant children's playground, reconfigured parking area at Marnier's Park (triangular grass area at Lake Avenue and Surfside Avenue), a dog park, kayak launch, amphitheater, water sculpture, and kayak storage facility. The draft master plan generated substantial opposition from the community and has since been rejected by the Mayor and Commissioners." Seems that what was approved should be included. Did we use portapotties in for July 24, 2021?
155	Wyn Achenbaum	Public	62 Columbia Avenue	AC - Community Engagement	5		"The Committee considered the topic of what new elements might be used to rebuild the boardwalk after a catastrophic event. The Committee made a list of potential changes to the boardwalk structure and amenities for consideration in the event of a catastrophic event to afford sufficient time for pre-planning to take place prior to a disaster." Here's a wild idea: a bike lane at the second floor level, or even a double-decker deck, which would also allow walkers below to walk in shade. It would need to be kept away from the 2nd floors of the multi-story buildings, and might produce some resentment among hotel owners. It would take one form at the wide portions of the boardwalk, and another at the narrower portion. The ramps at each end, and maybe another set near the midpoint, would need to be thought through, but perhaps a kayak lift could serve as an alternative model. (The PR alone could be great. And it would give bikers a way to move safely through town on their way to and from the Gordons Pond trail.)
156	Wyn Achenbaum	Public	62 Columbia Avenue	AC - Community Engagement	7		"Removal of shrubbery in the median east of the traffic circle" -- the shrubbery may be gone, but the trees in the median the other plantings there obscure the view of westbound cars as one comes around the traffic circle heading for Columbia Avenue.

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157	Wyn Achenbaum	Public	62 Columbia Avenue	AC - Community Engagement	7		Does "Get a jitney service in place with a loop around the City and have it stop in front of parks and vacant lots" require RB to do that, or is it merely an idea to be considered? How does the reader know which it is? IS putting it in the Appendices indication that it is just an idea, or does this have the force of law?
158	Wyn Achenbaum	Public	62 Columbia Avenue	AC - Community Engagement	8		"In addition to these programs and services, CAMP Rehoboth played an active role in the advancement of marriage equality in Delaware and worked to educate ... " "worked" should be "works"
159	Wyn Achenbaum	Public	62 Columbia Avenue	AC - Community Engagement	11		"Explain how the City gets funding from the dock" How does the City get funding from the dock? When will we break even on what we spent? Who collects it?
160	Jim Ellison	City	Planning Commission	AC - Community Engagement	11	Rehoboth Art League	Rehoboth Art League: The RAL serves the greater region and should be listed under that category. (I say this as a recent chair of the Board of Trustees)
161	Jim Ellison	City	Planning Commission	AC - Community Engagement	15	Rehoboth Beach Library	Correct title is Rehoboth Beach PUBLIC Library
162	Dorothy Morris	Agency	PLUS: Office of State Planning Coordination	AD - Public Comments	2		CERTIFICATION COMMENT: Please provide written verification that the comprehensive plan has been shared with and reviewed by the county and near-by local jurisdictions. In Rehoboth's case, it states the plan was shared with the Town of Dewey Beach, the Town of Henlopen Acres, the City of Lewes, and Sussex County. Please include, in appendix D, any written correspondence between the city and these jurisdictions regarding the plan and any changes made to the plan as a result of these comments. If any of the jurisdictions were notified and did not respond, that information should be included as well.
163	Jim Dedes	Agency	Town of Dewey Beach Assistant Town Manager	General			Thank you for sharing your draft plan with the Town of Dewey Beach. I have had the opportunity to read through the draft Comprehensive Plan as requested. I am most impressed with the comprehensive review the City of Rehoboth has put forth in development of the draft plan. I plan to share this with our Town Manager, Mayor and Town Commissioners, and our Planning and Zoning Commission. They may also wish to provide feedback.
164	Wyn Achenbaum	Public	62 Columbia Avenue	General			The 2010 CDP is a bit over 100 pages. This report, in its current form, is 266. I recommend that the CDP be restructured before it is finalized. The current draft contains a huge amount of important and useful information, and putting it at everyone's fingertips is excellent, but the CDP is intended to be primarily a decision-making tool. Having so much reference information embedded in its chapters obfuscates its purpose. Please consider moving to new appendices the information that doesn't enter into ongoing decision-making. This needs to serve as guidance to people who want to build; to BI and BOA and PC members who need to know how far code can be stretched; to M&C members who will be undertaking a thorough review of our Building Code and Zoning Code; to M&C members who must judge proposals before them, and who makes the decision. Put the information about earlier CDP's in one appendix; much of Chapter 3 (Community Character and Profile) in another; and from the other chapters, all that isn't directive in its purpose.
165	Janelle Cornwell	Agency	City of Lewes	General			I have read the plan and have no issues.
166	Wyn Achenbaum	Public	62 Columbia Avenue	General			It is not incumbent on us - or necessarily in our best interests - to seek to satisfy the preferences of people who reside just beyond our borders, beyond assuring access and egress to those who go to Henlopen Acres, North Shores and CHSP. And it is not incumbent on us to satisfy the non-resident owners of land in our commercial district. Further, it should not be a primary goal to make owning land within our borders profitable. (That may happen as a result of promoting "the health, safety, prosperity and general public welfare of the jurisdiction's residents" -but it is a by-product, not a purpose.)
167	Wyn Achenbaum	Public	62 Columbia Avenue	General			It is also worth remembering that the median age of the residents of the city is 64.1 years.3 2019. Source: https://datausa.io/profile/geo/rehoboth-beach-de ; https://www.city-data.com/city/Rehoboth-Beach-Delaware.html says 65.4 years. Zipcode 19971 is 60.5 years, per https://www.city-data.com/zips/19971.html
168	Wyn Achenbaum	Public	62 Columbia Avenue	General			"Investors" and "Developers" are not the small-business people who stay around to create and build businesses here. How many of our businesses own the site on which they operate? Yet they pour money into those buildings they don't own, and, at the end of their lease, it is the building's owner who has the valuable asset. It appreciates not because of anything the landlord is doing or providing, but because of the activity of the tenant and of the community as a whole.
169	Wyn Achenbaum	Public	62 Columbia Avenue	General			The constraint of our size has to be the starting point for all that follows. And we need to be aware that maximizing and optimizing are often two very different things.
170	Wyn Achenbaum	Public	62 Columbia Avenue	General			Maintaining the charm, scale and unique appeal that is RB is the next priority. It needs to remain a special place to visit, a welcoming and relaxed place to live, and a good place to run a small business. If the priority becomes maximizing the profit that can be made by folks who simply "invest" in land here, and build the largest building that can be squeezed onto a lot by pushing for dispensations from the specifications of our code - and the beneficiaries never needing to be impacted by the effects those dispensations have on the residents and others who come here on a regular basis, we will have gone astray.
171	Wyn Achenbaum	Public	62 Columbia Avenue	General			In order to retain our scale and our charm, and the welcome we give to a wide range of visitors - ours is the closest ocean beach for many millions of people from the DC and Baltimore metros and for many Delaware residents; we compete with the southern NJ beaches for the Wilmington and Philadelphia metros - we must concentrate on what makes us special, and seek to protect it, not to risk it.
172	Wyn Achenbaum	Public	62 Columbia Avenue	General			We aren't here to see how far the limits can be pushed.
173	Wyn Achenbaum	Public	62 Columbia Avenue	General			Arguably, our beach coupled with our unique "personality" of small, interesting restaurants and businesses that serve the preferences of our visitors and restaurants, are sufficient. Do we feel a need to seek to bring more 1 %-ers here, or might there be more people to serve beyond that threshold?
174	Wyn Achenbaum	Public	62 Columbia Avenue	General			Do we want to cram more in? For whose benefit? And at the loss of what?
175	Wyn Achenbaum	Public	62 Columbia Avenue	General			Let's conserve what we've got; maintain and upgrade it. Let's not write a plan that is designed to provide loopholes through which larger and more buildings can be built.
176	Wyn Achenbaum	Public	62 Columbia Avenue	General			We are very fortunate that the Army Corps of Engineers will continue to renourish our beach for decades to come. But we'd be wise not to encourage more development of major buildings along our Boardwalk, given the changing climate.
177	Wyn Achenbaum	Public	62 Columbia Avenue	General			Moneyed interests want what they want, but they don't promise to stay here to "enjoy" the consequences of what they want; they move on to their next opportunity. That's what they do, what they're for.
178	Wyn Achenbaum	Public	62 Columbia Avenue	General			Our CDP should not be designed to be a permissive document. Not all "development" is a good thing. Adding more 5+ bedroom houses on lots not large enough to park all the cars that come with them is not wise policy.
179	Wyn Achenbaum	Public	62 Columbia Avenue	General			The Canal, from Dewey Beach to well above the northernmost of our land area, is part of the City. [Map 2, at p. 93 of 266, suggests that the portion of the Canal that is part of the City stops near the Henlopen Acres Marina, and that is not my understanding.] What is in our residents' best interest in relation to the Canal? For example, it is probably not to encourage canal traffic that requires the opening of the drawbridge on which most city residents, most HA & NS residents, and most visitors depend.
180	Wyn Achenbaum	Public	62 Columbia Avenue	General			Further, knowing what we know about climate change and sea level rise, and that with warming oceans, clouds are holding more moisture and storms are stalling more often, do we really want to "collaborate" with any kind of large dense development along our Boardwalk? Haven't the experiences of other communities in the past decade shifted our perspective a bit? We sit at sealevel, and that has a different meaning from what it meant 10 or 20 years ago. We have been fortunate with respect to hurricanes, and hope that continues, but we also experienced the 1962 storm which lasted several days and did significant damage.
181	Jim Ellison	City	Planning Commission	General			You have established the following structure for text headings: 1: Primary Topic: Blue band with white bold caps; 2: Secondary Topic: Blue bold caps underlined; 3: 3rd level Topic: Black bold caps; 4: 4th level Topic: Black caps and lower case, underlined, no bold. NOTE: Page AB-4 has a perfect display of these four levels of topics. Many of the inconsistencies listed below have to do with this structure.
182	K. Claire Quinlan	Agency	PLUS: DNREC	General			Staff from the Delaware Department of Natural Resources and Environmental Control (DNREC) reviewed the draft comprehensive plan submitted for PLUS review. The absence of comments regarding specific resources does not indicate that there are not additional constraints or environmental issues, nor does it indicate DNREC support of a particular plan element. Municipal officials are encouraged to reach out to Clare Quinlan at (302) 735-3480 if they have any specific requests for information.

Rehoboth Beach Comprehensive Development Plan
Comments Received on Draft #5 (since release on February 1, 2022)
Updated: April 21, 2022

No.	Name	Comment Category	Address or Affiliation	Chapter	Page	Paragraph	Comment
183	Milton Melendez	Agency	PLUS: DDA	General			<p>The Delaware Department of Agriculture welcomes the opportunity to provide recommendations for this municipal comprehensive plan. Agriculture is the State's largest industry and its most significant land use. As an economic force the agriculture/food system provides more jobs and impacts in the state's economy than any other sector. In addition to the direct economic impacts throughout the state, agriculture and forestry provide billions of dollars in environmental services to the citizens of Delaware in the form of air and water cleansing, weather moderation, carbon sequestration, outdoor recreation, wildlife habitat, scenic vistas - and the list goes on. These services are largely uncompensated and represent a significant contribution to the quality of life and the health of Delaware's citizens and visitors. Agriculture and forestry are the state's most important land uses. The majority of the state's private lands are farms. Farms and forests dominate the landscape. This fact alone dictates that these land uses must be a crucial part of the future land use planning in every comprehensive plan. Over three-quarters of the private open space in Delaware is in farms. The maintenance of these land uses is crucial to our future quality of life and the orderly and pleasing development of the state. In addition the State of Delaware is investing millions of taxpayer dollars in the permanent preservation of these lands and all the attendant benefits they provide. Every comprehensive land use plan should account for these factors in balancing future development, preservation of farmland and forest, and the enhancement of the economic activities associated with our working lands. Undoubtedly future generations will judge our effectiveness at land use planning by what they see around them. Like Delawareans today they will expect us to balance growth and development with the preservation and enhancement of agriculture and forestry. The following proposed steps provides municipal governments with directives that can be implemented to maximize the preservation and longevity of agriculture in your surrounding areas.</p> <p>AGRICULTURE: 1) Identify areas within the municipality where agriculture is considered the highest priority land use; 2) Encourage the protection of prime agricultural land; 3) Discourage development activities and capital projects incompatible with modern agriculture; 4) Encourage separation of residential and agricultural areas through the zoning and subdivision process (this includes significant buffering and setback requirements for lands adjacent to agricultural operations); 5) Encourage, support, and maintain existing and proposed agricultural support enterprises and ag-related businesses; 6) Encourage the development of local markets for locally grown foods; 7) Encourage agricultural use protections and strong right-to-farm policies in agricultural areas; 8) Establish and support financial incentives that encourage and allow landowners to remain in agriculture; 9) Promote policies that maintain and foster economic viability within the agricultural sector</p> <p>DENSITY AND EFFICIENT LAND DEVELOPMENT: 1) Encourage maximum use of existing and planned infrastructure; 2) Designate infill areas & project number of units to be constructed in those ATEAS; 3) Discourage development patterns that promote inefficient use of land (i.e., discourage developments where lots frequently exceed minimum lot size requirements); 4) In conjunction with population projections, project acres of residential land needed for a given time period and discourage consumption of land in excess of that need with allowance for reasonable market competition; 5) Direct growth toward existing population centers.</p>
184	Dorothy Morris	Agency	PLUS: Office of State Planning Coordination	General			<p>1. Once all edits, changes and corrections have been made to the plan, please submit the completed document (text and maps) to our office for review. Your PLUS response letter should accompany this submission. Also include documentation about the public review process. 2. Our office will require a maximum of 20 working days to complete this review. a. If our review determines that the revisions have adequately addressed all certification items, we will forward you a letter to this effect. b. If there are outstanding items we will document them in a letter and ask the town to resubmit the plan once the items are addressed. Once all items are addressed, we will send you the letter as described above. 3. Once you receive our letter stating that all certification items have been addressed, the Planning Commission and Council should adopt the plan pending State certification. We strongly recommend that your Council adopt the plan by ordinance. The ordinance should be written so that the plan will go into effect upon receipt of the certification letter from the Governor. 4. Send our office a copy of the adopted plan along with the ordinance (or other documentation) that formally adopts your plan. We will forward these materials to the Governor for his consideration. 5. At his discretion, the Governor will issue a certification letter to your city.</p>
185	Glenn Mandalas	Agency	On behalf of Henlopen Acres	General		All Maps	<p>Henlopen Acres has begun to review the draft Rehoboth Beach CDP. I assume that because I also represent Henlopen Acres, they reached out to me with a question about the City boundary shown in the various maps, and exclusively on Map 1. They provided me with the attached resolution and map that has been recorded, along with some newspaper clippings from the early 1970s. The documents suggest that Henlopen Acres annexed a portion of the canal along its border that is shown in the draft CDP as within the Rehoboth Beach boundary.</p>
186	Tom Roth	Agency	Town of Henlopen Acres Town Manager	General			<p>I have not seen any 2020 town level census data. I'm wondering what your source is for items such as: Statistics on race, population, housing and household. The Mayor doesn't feel they are accurate.</p>
187	Tom Roth	Agency	Town of Henlopen Acres Town Manager	General		All Maps	<p>Also, has Glenn Mandalas spoken to you about the canal annexation? I have documentation that shows that Henlopen Acres annexed half of the width of the canal, prior to Rehoboth annexing the entire width.</p>