



STATE OF DELAWARE
STATE COUNCIL FOR PERSONS WITH DISABILITIES
Margaret M. O'Neill Bldg., Third Floor, Suite 1
410 Federal Street
Dover, Delaware 19901
302-739-3621

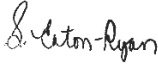
The Honorable Matt Meyer
Governor

John McNeal, Director
SCPD

MEMORANDUM

DATE: July 27, 2026

TO: Lisa Vest, Hearing Officer
DNREC, Office of the Secretary
89 Kings Highway
Dover, Delaware 19901

FROM: Susannah Eaton-Ryan, Chairperson 
State Council for Persons with Disabilities (SCPD)

RE: **Department of Natural Resources and Environmental Control Division of Parks and Recreation 9201 Regulations Governing State Parks (July 1, 2026)**

The State Council for Persons with Disabilities has reviewed the proposed amendments to the Regulations Governing State Parks. SCPD supports the proposed regulation with the following recommendations.

Service animals

The proposed regulation defines a service animal as a trained dog. This is generally consistent with Delaware law. However, the regulation should clearly state that this definition does not limit the Division's responsibilities under the Americans with Disabilities Act, Section 504 of the Rehabilitation Act, or other applicable federal disability laws.

Federal disability regulations may require public entities and recipients of federal financial assistance to make reasonable modifications to permit the use of a trained miniature horse. See 28 C.F.R. § 35.136 and 45 C.F.R. § 84.73.

SCPD recommends adding language substantially similar to the following:

"Nothing in this regulation limits the Division's obligations under the Americans with Disabilities Act, Section 504 of the Rehabilitation Act, or other applicable federal disability laws, including the obligation to consider reasonable modifications for the use of a trained miniature horse when required by law."

The regulation or related public guidance should also explain that a person using a service animal is not required to provide an official training certificate, identification card, registration document, or other proof of certification. Staff should not ask an individual to provide such documentation.

Accessible online information and services

The proposed regulation refers members of the public to the Delaware State Parks website for information such as rates, fees, permits, reservations, and park policies.

SCPD recommends that the Division ensure that this information, and all related online services, are accessible to people with disabilities. Information should be easy to locate, provided in accessible formats, and made available in alternate formats upon request.

SCPD recognizes the State Parks website includes a “User Way” accessibility overlay, however an overlay should not replace a full accessibility review and corrections of the website. SCPD recommends that the Division conduct, if it has not already done so, a complete review of the State Parks website and all linked public service processes for compliance with applicable Web Content Accessibility Guidelines.

SCPD supports the proposed amendments with these recommendations. Clear federal disability access language and accessible online information will help ensure that individuals with disabilities can fully and equally use Delaware State Parks.

Thank you for your consideration of our comments. Please do not hesitate to contact us with any questions.

cc: Marissa Band, Esq., DLP
DDC
GACEC