



STATE OF DELAWARE
EXECUTIVE DEPARTMENT
OFFICE OF MANAGEMENT AND BUDGET
STATE PLANNING COORDINATION

September 17, 2007

Jason Palkewicz
McCrone, Inc.
119 Naylor Mill Road, Bldg. 1, Ste. 6
Salisbury, MD 21801

RE: PLUS review – PLUS 2007-08-02; Pelican Landing

Dear Mr. Palkewicz:

Thank you for meeting with State agency planners on August 22, 2007 to discuss the proposed plans for the Pelican Landing project to be located east of the Route 24 and 279 intersection in Sussex County.

According to the information received, you are seeking a rezoning and site plan review for 100,000 sq. ft. of commercial on 13.64 acres.

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 Sussex County is the governing authority over this land, the developers will need to comply with any and all regulations/restrictions set forth by the County.

Executive Summary

The following section includes some site specific highlights from the agency comments found in this letter. This summary is provided for your convenience and reference. The

full text of this letter represents the official state response to this project. ***Our office notes that the applicants are responsible for reading and responding to this letter and all comments contained within it in their entirety.***

State Strategies/Project Location

- The Project is located east of the intersection of Delaware Route 24 and Sussex County Road 279 within the Sussex County Environmentally Sensitive Developing Area. In addition the proposed project is also located within State Investment Levels 2 and 3 as defined by the State's Strategies for Policy and Spending. These areas are where the State anticipates future growth is to occur. Because it is within the ESDA it is expected that special considerations be made to lessen environmental impacts to the Inland Bays Watershed.

Street Design and Transportation

- Delaware Route 24 is classified as a collector road. DelDOT's policy is to require dedication of sufficient land to provide a minimum right-of-way width of 40 feet from the centerline on collector roads. Therefore DelDOT will require right-of-way dedication along the frontage to provide any additional width needed from this project.
- DelDOT will require the developer to provide a 15-foot wide permanent easement along the property frontage and provide a 10-foot wide shared use path within that easement.
- DelDOT recommends that cross access easements be provided to Tax Parcels 2-34-7.00-89.00, 2-34-7.00-90.00, 2-34-7.00-92.00, and 2-34-7.00-86.00. The first three of these parcels are presently residences, which may well be redeveloped commercially if the shopping center is developed behind them.

Natural and Cultural Resources

- The proposed wetland buffer width of 25 feet is highly inadequate for protecting the function and integrity of adjacent wetlands and should be increased to at least 100 feet in width. In order to provide an adequate wetland buffer the project should be redesigned so that the rear parking access is not within 100 feet of wetlands.
- The stormwater management pond is also too close to existing wetlands and options for relocating the pond or using alternative methods of stormwater should

be discussed with the district engineer (or entity that approves the stormwater plan).

- The Water Supply Section recommends that the portion of the new development within the wellhead protection area not exceed 20% impervious cover (DNREC, 2005). The proposed development would change the impervious cover from 1.4% to approximately 61.7%. The developer on the PLUS application provided these numbers.

The Water Supply Section recommends:

- Relocate the entry roadway to a portion of the parcel outside the wellhead protection area.
 - Maintain the portion of the wellhead protection area within the development as open space with low maintenance vegetation that does not require herbicides, pesticides, or fertilizers.
 - Divert stormwater runoff away from the wellhead.
- DNREC recommends the following to consider implementing measures that will aid in forest loss reduction:
 - Minimize tree clearing as much as possible. This can be accomplished by downsizing the project and exploring green technology for parking and stormwater areas.
 - Tree clearing should not occur April 1st to July 31st to reduce impacts to birds and other wildlife that utilize forests for breeding. This would only protect those species for one breeding season; once trees are cleared there is an overall loss of habitat.

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

Office of State Planning Coordination – Contact: Bryan Hall 739-3090

The Office of State Planning and Coordination recognizes that this project lies within the State Investment Levels 2 and 3 as defined by the State's Strategies for Policy and Spending and within Sussex County Environmentally Sensitive Developing Area (ESDA) as defined within the 2003 Sussex County Comprehensive Land Use Plan as an area of exceptional natural resources that allows for necessary infrastructure to minimize development impacts to this area of the County. This office has no objection to the proposal and encourages the developer to coordinate with Sussex County Planning and Zoning as this project moves through the County approval process. This office does

however make the following recommendations to further improve the quality and marketability of this project to its future residents.

As identified by comments provided by DeIDOT possible improvements will be need to Route 24 to allow for sufficient right of way as well as a walking path for future residents. These concessions if granted will allow for improved access to the project and lessen traffic to Route 24 while preserving the road corridor for future road improvements.

In addition it is noted that significant forests will be removed for this project. As the developer is made aware through the DNREC comments; trees provide a mix of benefits to the ESDA within Sussex County. The developer should consider green design and develop a comprehensive landscape plan that incorporates recognized Green Technologies while adding trees to the parking lot areas to further improve the appearance of the project while addressing DNREC concerns.

I hope that the developer will further consider these recommendations and I look forward to working with the developer as the proposed site plan is refined.

Division of Historical and Cultural Affairs – Contact: Terrance Burns 739-5685

According to the historical resources and documents at the State Historic Preservation Office, there are no recognized or known archaeological or historical sites on this parcel (property or project area), but there is a possibly there could probably still be undiscovered archaeological sites (prehistoric or historic) remaining somewhere on the premisis. If any construction proceeds on this parcel (property or project area), the State Historic Preservation Office of the Division of Historical & Cultural Affairs would like the opportunity to examine the area prior to any demolition or ground-disturbing activities, to see if there are any archaeological sites on it, in order to learn more information about this area in detail. If you (the developer) would like to discuss this information or other issues further, contact the State Historic Preservation Office Division of Historical & Cultural Affairs at (302) 744-7400 ext.25, and we will be more than happy to assist you.

Department of Transportation – Contact: Bill Brockenbrough 760-2109

Pelican Landing – Route 24, LLC seeks to develop a 100,000 square foot shopping center on an approximately 10.64-acre assemblage of parcels (Tax Parcels 2-34-7.00-88.00 (part), 2-34-7.00-91.00 and 2-34-7.00-92.01) located on the north (westbound) side of Delaware Route 24 east of Camp Arrowhead Road (Sussex Road 279). The land is zoned

AR-1 in Sussex County and rezoning to B-1 would be necessary to permit the proposed development.

DelDOT comments, which concern the site plan presented more than the rezoning, are as follows:

- 1) Delaware Route 24 is classified as a collector road. DelDOT's policy is to require dedication of sufficient land to provide a minimum right-of-way width of 40 feet from the centerline on collector roads. Therefore DelDOT will require right-of-way dedication along the frontage to provide any additional width needed from this project.
- 2) DelDOT will require the developer to provide a 15-foot wide permanent easement along the property frontage and provide a 10-foot wide shared use path within that easement.
- 3) The proposed development meets DelDOT warrants for a traffic impact study (TIS) and the developer's traffic engineer has already met with us to discuss the scope of work for a study. DelDOT will comment to Sussex County on the need for off-site improvements to support this development when they have reviewed the completed study. Close attention will be paid to the impacts of this proposed development on Route 24, which is already heavily congested in this area.
- 4) DelDOT recommends that cross access easements be provided to Tax Parcels 2-34-7.00-89.00, 2-34-7.00-90.00, 2-34-7.00-92.00, and 2-34-7.00-86.00. The first three of these parcels are presently residences, which may well be redeveloped commercially if the shopping center is developed behind them. If they do, DelDOT would rather serve them through the proposed shopping center entrances than grant them separate commercial entrances. The fourth parcel is Creekside Professional Center, immediately west of the proposed shopping center. An easement there, with the cooperation of that property owner, would allow patrons of the two development to travel between parking lots without entering Route 24.
- 5) The developer's traffic engineer has already met with the DelDOT Subdivision Manager for Sussex County, Mr. John Fiori, to determine appropriate access locations for the site and the plan presented appears to reflect their discussions. If the rezoning is approved, the developer's site engineer should maintain that coordination through the plan development process. Mr. Fiori may be reached at (302) 760-2260.

- 6) DelDOT supports DNREC's comments about the proposed increase in impervious surface area, from less than 2 percent of the site area to almost 62 percent. This increase is especially significant because of the site's proximity to Stillman Glade. Efforts should be undertaken to reduce the amount of hard surface, including landscaping, rain gardens, and bio-retention (if feasible).

**The Department of Natural Resources and Environmental Control – Contact:
Kevin Coyle 739-9071**

Wetland Permitting Information

Statewide Wetland Mapping Project (SWMP) maps indicate the presence of palustrine forested wetlands on this site. Impacts to Palustrine wetlands are regulated by the Army Corps of Engineers through Section 404 of the Clean Water Act. In addition, individual 404 permits and certain Nationwide Permits from the Army Corps of Engineers also require 401 Water Quality Certification from the DNREC Wetland and Subaqueous Land Section and Coastal Zone Federal Consistency Certification from the DNREC Division of Soil and Water Conservation, Delaware Coastal Management Program (DCMP) Section. Each of these certifications represents a separate permitting process. Please be advised that nationwide permits have been suspended in Delaware and are pending further coordination with the Corps. Therefore, contrary to past practices, Coastal Zone Management approval can no longer be assumed. Individual certifications must be granted from the DCMP office for each project intending to utilize a Nationwide Permit. For more information on the Federal Consistency process, please contact the DCMP office at 302.739.9283. To find out more about permitting requirements, the applicant is encouraged to attend a Joint Permit Process Meeting. These meetings are held monthly and are attended by federal and state resource agencies responsible for wetland permitting. Contact Denise Rawding at (302) 739-9943 to schedule a meeting.

Water Supply

The project information sheets state that water will be provided to the project by a Private Company. DNRC records indicate that the project is located within the public water service area granted to Tidewater Utilities under Certificate of Public Convenience and Necessity 83-W-15. It is recommended that the developer contact Tidewater Utilities 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 CPCNs and the application process can be obtained by contacting the Public Service Commission at 302-739-4247. Since an on-site Public/Miscellaneous 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, 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 approximately four weeks to process, which allows the necessary time for technical review and advertising.

Potential Contamination Sources exist in the area, and any well permit applications will undergo a detailed review that may increase turnaround time and may require site specific conditions/recommendations. In this case there is an Underground Storage Tank called Shore Stop #120 located within 1000 feet of the proposed project.

Should you have any questions concerning these comments, please contact Rick Rios at 302-739-9944.

Water Resource Protection Areas

The Water Supply Section has determined that the proposed development falls substantially within a wellhead protection area for Daniel's Trailer Park Public Water Supply System DE0000603; the review did not find any excellent groundwater recharge areas, (see following map and attached map).

Wellhead protection areas are surface and subsurface areas surrounding a public water supply well where land use activities or impervious cover may adversely affect the quantity and quality of ground water moving toward such wells.

The Water Supply Section recommends that the portion of the new development within the wellhead protection area not exceed 20% impervious cover (DNREC, 2005). Some allowance for augmenting ground-water recharge is to be considered, if the impervious

cover exceeds 20% but is less than 50% of that portion of the parcel within this area. A water balance calculation is necessary to determine the quantity of clean water to be recharged via a recharge basin (Kauffman, 2005). However, the development should not exceed 50% regardless. The purpose of an impervious cover threshold is to minimize loss of recharge (and associated increases in storm water) and protect the quality and quantity of ground water and surface water supplies.

The proposed development would change the impervious over from 1.4% to approximately 61.7%. The developer on the PLUS application provided these numbers. The portion of the new development within the wellhead protection far exceeds DNREC recommendations.

The Water Supply Section recommends:

- Relocate the entry roadway to a portion of the parcel outside the wellhead protection area.
- Maintain the portion of the wellhead protection area within the development as open space with low maintenance vegetation that does not require herbicides, pesticides, or fertilizers.
- Divert stormwater runoff away from the wellhead.

References

Delaware Department of Natural Resources and Environmental Control, 2005, Source Water Protection Guidance Manual for the Local Governments of Delaware, p. 144.

http://www.wr.udel.edu/publications/SWAPP/swapp_manual_final/swapp_guidance_manual_final.pdf

Kauffman, G.J., Wozniak, S.L., and Vonck, K.J., 2005, Delaware Ground-Water Recharge Design Manual: Newark, DE, Water Resources Agency, University of Delaware, p. 31.

Listed as: "Supplement 1 – Groundwater Recharge Design Methodology"
<http://www.wr.udel.edu/swaphome/Publications/SWPguidancemanual.html>

Pelican Landing PLUS (2007-08-02)

Map of proposed development as it affects the wellhead protection area. The dark red area shows the wellhead protection area. The affected parcel is in light blue. The proposed development is overlaid to show the total impact of the wellhead protection area.



Sediment and Erosion Control/Stormwater Management

Standard Comment and Action Item: 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 as soon as practicable. 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 Sussex Conservation District. Contact Jessica Watson at the Sussex Conservation District at (302) 856-7219 for details regarding submittal requirements and fees.

Specific Comments and Recommendations: The PLUS application states that proposed stormwater management on this site is a storm drain collection system and wet pond with an outlet to existing wetlands. Because of the parcel's location in an impaired watershed and the amount of impervious surface, consider incorporating more green technology BMPs and low impact development practices to reduce stormwater flow and to meet water quality goals.

The Sediment and Stormwater Management Program ensures sediment and erosion control plans and stormwater plans comply with local land use ordinances and policies - including the siting of stormwater management facilities. However, we do not support placement in resource protection areas or removal of trees for the sole purpose of placement of a stormwater management facility/practice.

Drainage

The Drainage Program does not support the removal of trees for the creation of stormwater management areas. It is preferred to preserve existing riparian buffers on this site to aid in the reduction of nutrients, sediment, and other pollutants entering Stillman Glade. However, the Drainage Program recognizes that tree removal is unavoidable in some cases. Where practical, plant native trees and shrubs to compensate for the loss of nutrient uptake and stormwater absorption the removed trees provided. Please explore methods to filter excess nutrients in stormwater runoff from this site before releasing the stormwater into the watershed.

For questions or clarifications, please contact Jim Sullivan at (302) 739-9921.

Floodplains

Any development greater than 5 acres or 50 lots located in a Zone A floodplain must develop a Base Flood Elevation (BFE) and submit it to Sussex County as part of their application. A portion of the 10.497 acre parcel lays within a Zone A floodplain for Stillman Glade, and would require a BFE to be determined. A portion of the 2.68 acre parcel is located within a Zone AE floodplain with a BFE of 6.2 NAVD 88. Special consideration should also be given to the residential properties that this proposal surrounds and is adjacent to. These property owners should not be adversely affected by

flooding or stormwater problems that result from any development on the adjoining property.

Rare Species

DNREC has not surveyed this parcel; therefore, it is unknown if there are state-rare or federally listed plants, animals or natural communities at this project site. However, according to the GIS database there are tidal scrub wetlands just upstream from the project site that could be degraded if adequate wetland buffers are not provided. Tidal shrub wetlands are transitional between emergent wetlands and forested wetlands and possess many important wetland values and functions, as well as providing important habitat for an array of wildlife species. Specific hydrologic, edaphic, and topographical conditions must be in place in order for tidal shrub wetlands to develop. If these conditions are disturbed or changed in anyway from construction activities, the potential exists for community structure and plant species composition to shift in an unfavorable direction. Runoff generated by this project could be detrimental to this wetland type.

Recommendations:

1. The proposed wetland buffer width of 25 feet is highly inadequate for protecting the function and integrity of adjacent wetlands and should be increased to at least 100 feet in width. This recommendation is made to protect water quality, to protect critical upland breeding habitat for wetland dependent species which utilize these buffers during a portion of their life cycle and to provide a buffer for wildlife travel along the stream.
2. In order to provide an adequate wetland buffer the project should be redesigned so that the rear parking access is not within 100 feet of wetlands. If the rear access is not for truck loading/unloading or safety purposes, then eliminating it should be considered. Otherwise, a redesign of front parking areas and building dimensions would be necessary to shift this rear parking area out of the wetland buffer.
3. The stormwater management pond is also too close to existing wetlands and options for relocating the pond or using alternative methods of stormwater should be discussed with the district engineer (or entity that approves the stormwater plan).

Forested Wildlife Habitat

A more environmentally sensitive design could have been drafted. Other than downsizing the project, forest loss would be difficult to minimize as there is little connected open

space remaining that is not paved or part of a stormwater management pond. Cumulative forest loss throughout the state is of utmost concern to our Division which is responsible for conserving and managing the states wildlife (see www.fw.delaware.gov and the Delaware State Code, Title 7). Because of an overall lack of forest protection, DNREC have to rely on applicants and/or the entity that approves the project (i.e. counties and municipalities) to consider implementing measures that will aide in forest loss reduction. DNREC recommends the following:

1. Minimize tree clearing as much as possible. This can be accomplished by downsizing the project and exploring green technology for parking and stormwater areas.
2. Tree clearing should not occur April 1st to July 31st to reduce impacts to birds and other wildlife that utilize forests for breeding. This would only protect those species for one breeding season; once trees are cleared there is an overall loss of habitat.

Nuisance Species

The applicant indicated that nuisance species would be considered, however, specific methods were not listed. To deter a large concentration of nuisance geese, we recommend native plantings, including tall grasses, wildflowers, shrubs, and trees at the edge and within a buffer area (at least 50 feet) around stormwater management ponds. Geese do not feel as safe from predators when their view of the area is blocked and will be less likely to take up residence in the pond. These plantings should be completed as soon as possible as it is easier to deter geese when there are only a few than it is to remove them once they become plentiful. The Division of Fish and Wildlife does not provide goose control services, and if problems arise, residents or the home-owners association will have to accept the burden of dealing with these species (e.g., permit applications, costs, securing services of certified wildlife professionals). Solutions can be costly and labor intensive; however, with proper landscaping, monitoring, and other techniques, geese problems can be minimized.

Underground Storage Tanks

There is one inactive and one active LUST site(s) located near the proposed project:

Village Mobil Mart, Facility # 5-000135, Project # S9107133
Shore Stop #254, Facility # 5-000709, Project # S0409109

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

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

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

The State Fire Marshal's Office has no objection to re-zoning requests. The information provided below shall be considered when plans are being designed.

a. **Fire Protection Water Requirements:**

- Water distribution system capable of delivering at least 1500 gpm for 2-hour duration, at 20-psi residual pressure OR at least 1000 gpm for 1-hour duration, at 20-psi residual pressure, depending on the proposed occupancy, is required. Fire hydrants with 800 feet spacing on centers.
- Where a water distribution system is proposed for the site, the infrastructure for fire protection water shall be provided, including the size of water mains for fire hydrants and sprinkler systems.

b. **Fire Protection Features:**

- All structures over 10,000 sq. ft. aggregate will require automatic sprinkler protection installed.
- Buildings greater than 10,000 sq. ft. 3-stories or more, over 35 feet, or classified as High Hazard, are required to meet fire lane marking requirements
- Show Fire Department Connection location (Must be within 300 feet of fire hydrant), and detail as shown in the DSFPR.
- Show Fire Lanes and Sign Detail as shown in DSFPR

c. **Accessibility**

- All premises, which the fire department may be called upon to protect in case of fire, and which are not readily accessible from public roads, shall be provided with suitable gates and access roads, and fire lanes so that all buildings on the premises are accessible to fire apparatus. This means that the access road to the subdivision from the main thoroughfares must be constructed so fire department apparatus may negotiate it.
- Fire department access shall be provided in such a manner so that fire apparatus will be able to locate within 100 ft. of the front door.
- The use of speed bumps or other methods of traffic speed reduction must be in accordance with Department of Transportation requirements.
- The local Fire Chief, prior to any submission to our Agency, shall approve in writing the use of gates that limit fire department access into and out of the development or property.

d. **Required Notes:**

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

Department of Agriculture - Contact: Scott Blaier 698-4500

The Delaware Department of Agriculture has no objections to the proposed rezoning. The *Strategies for State Policies and Spending* encourages environmentally responsible development in Investment Level 3 areas.

Right Tree for the Right Place

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

Native Landscapes

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

Public Service Commission - Contact: Andrea Maucher 739-4247

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

Department of Education – Contact: John Marinucci 735-4055

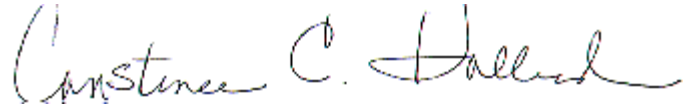
DOE recognizes that this development project is in both level 3 and 4 of the State Strategies for Policies and Spending. This proposed development is within the Cape Henlopen School District. This is a commercial/industrial rezoning request with no apparent impact on educational infrastructure, capacity or demand. DOE has no comments or objections to this rezoning request.

Following receipt of this letter and upon filing of an application with the local jurisdiction, the applicant shall provide to the local jurisdiction and the Office of

State Planning Coordination a written response to comments received as a result of the pre-application process, noting whether comments were incorporated into the project design or not and the reason therefore.

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

Sincerely,

A handwritten signature in cursive script that reads "Constance C. Holland". The signature is written in black ink and is positioned to the right of the word "Sincerely,".

Constance C. Holland, AICP
Director

CC: Sussex County