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December 21, 2007

Office of State Planning
122 William Penn St.
Haslett Armory, Ste 302
Dover, DE 19901

Attn: Ms. Constance C. Holland, AICP
Director

Re: Response to 11/30/07 PLUS Review Comments
Stony Creek Subdivision #2007-10-08
Summer Hill Developments
GMB No. 2005132.B

Dear Ms. Holland:

This proposed subdivision went through the Sussex County Technical Advisory Committee (TAC) review process in February 2007. Many of the agencies commenting during this Preliminary Land Use Service (PLUS) review offered similar comments during the earlier process. Therefore we have compiled the background project data into a binder for your convenience, and have included the TAC comments and responses (See Appendices D and E) as references for the responses to the PLUS comments.

We offer the following in response to the comments forwarded to us via your letter of November 30, 2007:

Office of State Planning Coordination

The thrust of this comment is agency non-support due to the project location being within the State Strategy Investment Level 4 Area. In looking at the physical location of this property as shown on the Proximity Map (Appendix A), please note that the area immediately to the north of the site along Rt. 20 is a recorded subdivision which is shown as Level 3 on the State Maps, as are the properties to the northeast and east. These properties are also part of the recently created Johnson's Corner Sanitary Sewer District, or in the case of the Arrington Woods project, the West Fenwick Sanitary Sewer District. Furthermore, the properties to the immediate south along the northerly side of Rt. 54 are shown as Level 3 areas, and are included in the County's proposed expansion of the West Fenwick Sanitary Sewer District (Appendix G). It appears that this project is not included within the shaded area on the State maps because the adjoining major roads diverge at an angle, and the shading was carried along the major roads, omitting the closest north-south crossroad to the west of the major Rt. 54/Rt.20 intersection.

Furthermore, the project is located within the Environmentally Sensitive Development District Overlay Zone in accordance with the approved Sussex County Comprehensive Plan. Furthermore, the general area around the Rt. 54/Rt. 20 intersection has historically been shown as either a Village growth area, or some similar type of residential area, in the Comprehensive Plans preceding the current edition.

As stated above, the project is also located within an area proposed for extension of public sewer per the South Coastal Area Planning Study Update dated July 2005. The proposed extensions shown in this plan follow the areas historically designated for development by the Comprehensive Plan. This illustrates a coordinated effort by the County to tie the proposed development areas to the presence of adequate wastewater disposal.

Finally, the State has benefited from a massive developer funded improvement of the Rt. 54/Rt. 20 intersection, located approximately 2,500 feet east of Stony Creek Subdivision. In addition, the State via DelDOT is preparing plans to widen Rt. 54 to three lanes from the recently improved intersection east to the area just west of Fenwick Ditch, where the State completed major roadway and bridge improvements just a few years ago.

Our conclusion is that the County has historically planned for development in this area, as demonstrated by the Comprehensive Plan ESDD designation and the inclusion in the sewer planning. Artesian Water Company has also provided a "letter to serve" stating that it is feasible to extend public water service to the project. Furthermore, the State has already spent significant money in the immediate area, and has benefited from developer funded infrastructure in the immediate. We believe that the Level 4 designation is in error for the proposed Stony Creek Subdivision properties, and the historical and current events in the immediate area support this conclusion.

Division of Historical and Cultural Affairs

To date, no historic or cultural resources have been found on the property. As no federal permits are envisioned for this project, a detailed search for these resources will not be undertaken. However, if during the construction of the project any artifacts or other evidence of historic or cultural resources are discovered, the Delaware State Historic Preservation Office will be notified immediately.

Delaware Department of Transportation

Based on DelDOT's current regulations, the proposed Stony Creek development does not warrant a Traffic Impact Study (TIS). The proposed site with 90 single-family homes is estimated to generate 944 total trips on a typical weekday. That is 55% less traffic than the DelDOT TIS warrant of 2,100 or more trips per day for a

residential subdivision. The Design Memorandum (Appendix H) from Orth-Rodgers & Associates verifies the minimal impacts expected with this development, and addresses several of the specific points raised by Mr. Brockenbrough. This Design Memorandum was submitted as part of our initial package to Sussex County. Specific responses are delineated below:

- 1) We agree with minimum Right-of-Way of 30' as our proposed New Road section detailed two 11' travel lanes with two 5' shoulders.
- 2) Our site plan (Appendix C) illustrates that there is adequate room to provide the 15' permanent easement along the New Road frontage. This easement, and the 10' shared use path within, will result in additional tree clearing.
- 3) As noted in this comment, the proposed subdivision is not subject to a TIS under current DelDOT policy.
- 4) We showed these very same standards in the Orth-Rodgers Design Memorandum (Appendix H), therefore we agree with this comment. Furthermore, we understand that the condition of the existing New Road pavement is such that given the installation of gravity sewer and water lines, it will be necessary to re-construct the road as part of the infrastructure installation.
- 5) The extension of Millie Drive to the north was considered during the design phase, and we deemed this extension inadvisable due to the recorded subdivision which already exists. Since the Johnson's Corner Sanitary Sewer District has recently been created, the prospect of public sewer makes it likely that the existing small lot subdivision can be developed as recorded. In addition, residents of this subdivision will have immediate access to both Rt. 20 and New Road, so they will be able to travel in all directions without needing to cut through Stony Creek. We could modify the plan to accommodate the extension of the southerly leg of Stony Creek Drive, but this will result in the loss of additional forest, will bi-sect the largest proposed segment of forest to remain, and will provide access to a property which is currently considered a Level 4 investment area. We would prefer to maintain the street as currently proposed.

Department of Natural Resources and Environmental Control

With regard to the discussion about this property being located in a level 4 area, please refer to the commentary under "Office of State Planning Coordination" above. We believe that a solid case has been presented which indicates that the State has, and will continue, to invest in infrastructure to the benefit of these parcels.

The comment that "not doing the project at all is the best avenue for avoiding negative impacts" is true for every project in the State except possibly a brownfields remediation project. However, this project is accordance with planned growth as

evidenced by the Environmentally Sensitive Development District location in accordance with the approved Sussex County Comprehensive Plan. In addition, the project is also located within an area proposed for extension of public sewer per the South Coastal Area Planning Study Update. Preserving the property in its natural state does not consider the purpose of having development districts wherein growth is concentrated, in order to preserve other lands outside development districts. DNREC's stance that any permits requested are in conflict with the State's growth strategies does not reflect actual current development conditions and historical planning.

No SIRB sites were found within a half-mile radius. No underground tank sites found near the proposed development.

Soils

We understand that the soils present on-site are nearly level, and have water table restrictions. These considerations will be taken into account during the design of streets, utilities, stormwater management practices, and location of building pads. We will also stage our construction activities accordingly. These comments were addressed in our TAC response (Appendix E).

Wetlands

The reviewer's comment concerning the mapping of forested wetlands over "much of the subject parcel" is inaccurate. There are only 0.92 acres of forested wetlands on a parcel containing 47 acres of ground. None of the forested wetlands are proposed to be disturbed.

No filling or altering of any wetland areas will occur without appropriate permits from the Corps and/or DNREC as may be appropriate. Mr. Edward Launay of Environmental Resources Inc. has flagged all wetlands and waters of the US for this site, and will file appropriate jurisdictional delineation (JD) paperwork with the USACOE. His signature block is executed on Sheet G1.0 as found in Appendix C.

Existing nontidal wetlands are shown on the Preliminary Plat (Appendix C). These areas will be avoided by the development of infrastructure and residences. In fact, an average wooded buffer exceeding twenty (20') feet will be maintained around the wetlands. Furthermore, the wetlands will be located on community open space and will be protected by deed covenants.

Operation and maintenance of the open space will be provided by the developer until such time as the homeowners' association assumes the role. Since no wetlands are located within private lots, the protection of these areas is assured.

Wetlands Buffer

The wetlands have delineated by a certified wetlands scientist. All wetland areas delineated, isolated or connected, are preserved by the land plan.

The storm water management pond that is "too close" to the wetlands is located beyond a forested buffer around the wetlands. Furthermore, the proposed pond will have a wetlands fringe which will provide a second type of wetland habitat adjacent to the existing wetlands. However, during the final design and evolution of the stormwater management best management practices, we will certainly look into alternative methods which may preserve some of the forested buffer near the wetlands. We received comments during the TAC review that it may be appropriate to look at alternative techniques which allow the preservation of the forest and provided adequate stormwater management. We will endeavor to locate necessary stormwater management features in such a way to maximize forest retention and wetlands buffering.

Wetland buffers of 100 feet are not required by either State or County code.

Impervious Cover

The project data shown on the preliminary plats does accurately account for all impervious surfaces, using the proposed housing footprints and driveway lay-out as developed by Summer Hill Developments. The calculations do in fact include all the stated impervious sources (sidewalks, roads, roof tops, etc.) and there is no "significant underestimate" as alleged by the comment. However, we did not, and do not, consider stormwater management ponds as impervious area. Stormwater ponds do allow for recharge of ground water and serve to retain storm flows. Furthermore, the pond areas shown on the plans are both conservative pending final design, and subject to possible alteration should a different Best Management Practice be chosen. We agree that impervious cover is a definitive factor in assessment of overall watershed quality. We will utilize a combination of techniques to reach nitrogen and phosphorous removal goals. We may also reduce the size of some lots adjacent to the forest retention areas to increase buffers.

Exceptional Recreational or Ecological Significance Waters

This project lies within the drainage area of Roy Creek and the Little Assawoman Bay. As discussed above, an adequate reduction in nutrient levels can be achieved considering the historical use of the property and the proper combination of storm water management BMP's. Furthermore, the wastewater will go to a central collection and treatment facility, which means that nutrients from wastewater generated on-site will not be added to the site's nutrient load.

We have run the DNREC model on many projects and believe this project has the necessary components to meet the requirements. Wetlands will be buffered and there are no expansive areas of areas of impervious cover such as are associated with commercial development.

Total Maximum Daily Loads

Reduction in nutrient levels can be achieved using the proper combination of storm water management BMP's. Furthermore, the wastewater will go to a central collection and treatment facility, which means that nutrients from wastewater generated on-site will not be added to the site's nutrient load. We will run the DNREC model to demonstrate compliance with the 40% nitrogen reduction goal.

Compliance with TMDLs through the Pollution Control Strategy

We are familiar with DNREC assessment tool and many of the best management practices available. During the final design and approval of our stormwater management plan, we will seek to promote the use of BMP's which provide for greater buffering, less forest clearing, and maximization of green technology.

Water Supply

Water will be provided to this project via an agreement with Artesian Water Company, Inc. (Appendix F). We understand that construction plans and specifications must be approved by the Office of Drinking Water prior to construction initiation. We will prepare and submit said plans after receipt of Preliminary Subdivision Approval. We also understand that as-built drawings of the construction will be necessary to obtain an "Approval to Operate" the water system.

We are also familiar with the dewatering well requirements, and anticipate that dewatering will be required. Summer Hill Development has utilized Bunting & Murray Construction on several of their infrastructure contracts, and has confidence that Bunting & Murray will file appropriate permits.

Sediment and Erosion Control / Storm water Management

The storm water management design will meet all current regulatory requirements. We anticipate that the two (2) extended detention wet ponds will provide the majority of the treatment necessary to provide required quantity and quality management. The system will be designed to adequately manage and treat the storm water that originates on the property, and to handle any offsite water that migrates through the site. The design under consideration will preserve existing drainage patterns, and will not increase the peak quantity discharge for the two- or ten-year storm events. In addition to the extended detention ponds, we are prepared to utilize any of the filtration, sand filtration, hydrodynamic separator, or catch basin insert technologies

currently endorsed by DNREC, Sediment and Storm water Division. There are twenty-two of these technologies available, and these can be combined into the overall treatment train to meet water quality goals. With the amount of forest and buffers remaining on the site, we may also be able to utilize other best management practices which are non-structural in nature. All storm water management and erosion/sediment control plans will be approved by the Sussex Conservation District. All management practices proposed for this project will be in accordance with the current Delaware Storm water Design Manual. As stated several times above, we will endeavor to utilize technologies which reduce the footprint of impervious areas, reduce the pond sizes if possible, and convert these savings into retained forest.

Drainage

These comments are nearly identical to those contained in the TAC comments (Appendices D and E). We would highlight again the following points:

1. We will investigate downstream conditions as may be appropriate. Post development water volume discharges will be designed to maintain existing hydrology to the extent possible.
2. Native trees and shrubs will be planted where appropriate. Existing forest cover will be also retained to provide for nutrient uptake and stormwater absorption.
3. Any drainage facilities in rear yards will be protected via maintenance easements.
4. Correctly performed title studies will locate all easements, regardless of whether the easement originates on a Final Plat or within a deed.

Open Space

We agree with the comment regarding mowed surfaces. We will look to provide meadow type grasses with the final landscaping plans, in particular those areas associated with the community open space. We have also stated that we will consider stormwater management BMP's which may reduce the actual pond surface and provide for additional fringe wetlands, or additional retained forest within the open space. As this project will create a residential area with great connection to the forest (unlike many other Delaware projects which start out as houses springing up out of agricultural fields), it makes sense to commit to Community Open Spaces which offer a natural environment.

A total of 20.1 acres of open space is provided within the 47 acre parcel. This open space provides a mix of active and passive recreational opportunities. Furthermore, this proposal includes a community center and a swimming pool, both of which constitute admirable amenities for a project of 90 homes.

Site Visit Request

Environmental Resources, Inc. will provide a complete environmental analysis of the property. To date, site investigations have not revealed the presence of any threatened or endangered species. The project site lies outside of the area of concern for the Delmarva Fox squirrel, a local endangered species per maps provided by the U.S. Fish and Wildlife Service. ERI will contact the U.S. Fish and Wildlife Service and the DNREC Natural Heritage Program with regard to their records for this property and its vicinity. The site does not contain any critical habitats or habitat protection areas. ERI has also provided a complete field wetland delineation which will be coordinated with DNREC and the Army Corps of Engineers with regard to an official jurisdictional determination, and any required permits.

Forest Preservation

Comments indicating that lots should be omitted and forest blocks completely preserved are at considerable odds with creating a residential development in an area which is zoned for residential development, and where residential development is in accordance with the County Comprehensive Plan, and all wastewater planning studies conducted to date by the County. It is obviously impossible to create a neighborhood and retain an entire forest, in the same way that it is impossible to create a neighborhood and retain an entire agricultural field. The purpose of County Comprehensive Plans is to locate areas where development is to be concentrated. Once these decisions have been made, it is important to reduce impacts as much as possible, but it is also irresponsible to reduce lot yields as this simply leads to additional properties being converted from other uses to residential.

We address the four specific comments as follows:

1. Reducing the amount of forest clearing "by omitting lots and associated infrastructure" does not consider the purpose of having development districts wherein growth is concentrated, in order to preserve other lands outside development districts. We do agree that some of the lots can be reduced (i.e. some lots are slightly above 10,000 square feet which is the typical lot size in adjoining communities, and all lots are above the minimum required lot area. However, lots must be designed to accommodate housing products which are marketable, which means that lot widths and sizes may need to exceed minimum sizes from a practicable viewpoint), and these lot reductions will be added to forest retained.
2. Within a cluster style development, lot sizes are reduced to a point where the home footprint and necessary uses such as driveways and a small yard constitute the majority of the lot area. Deed restrictions to prohibit clearing on the individual lots do not make sense. The small lots have already allowed for forest to be conserved outside the lot area.

3. We will consider the use of techniques which do not require the clearing of trees. However, as engineers experienced in the design and creation of non-tidal wetlands, these techniques often result in a succession of plant types as the less water tolerant species die and are replaced by water tolerant species.
4. We will restrict the limited forest clearing to a time period outside of April 1 to July 31.

Plant Rescue

There are no wetlands which are "to be destroyed, filled, or disturbed". With regard to woodlands which will be cleared, we are not opposed to contacting the Delaware Native Plant Society.

Potential Hunting Issue

Forested buffers will remain around the developed areas. These will assist in the minimization of adjacent hunting effects on adjacent properties.

Nuisance Waterfowl

We agree that native plantings are an effective deterrent to nuisance waterfowl.

Air Quality

We agree that Energy Star homes are more efficient than those without the rating.

State Fire Marshall's Office

We agree with the SFMO review, and understand that the quoted sections of the Delaware State Fire Prevention Regulation govern this project. The road widths and turning radii will be sufficient to accommodate emergency vehicle traffic, and the central public water supply system will provide adequate fire protection.

We will prepare a Major Site Plan for SFMO review and approval as part of the permitting process prior to the Final Plat.

Department of Agriculture

We have addressed the Investment Level 4 area comment several times previously, and continue to maintain that the Level 4 designation is in error.

Forest Buffer – The existing forest will serve as wooded buffer within the 30' perimeter buffer. In select areas, the buffer is wider than 30' for added separation

from adjacent properties. All existing wooded areas to remain are shown on the Preliminary Plat (Appendix C).

Tree Removal – We will utilize Forestry Best Management Practices to perform the approximately 29.7 acres of clearing required for this project.

Arboriculture Considerations – We will seek to preserve some of the larger existing trees on the site, as approximately 16.8 acres of forest will remain post-development. GMB's Landscape Architect will be available to assist in the selection process for tree preservation. We agree to use the "right tree of the right place" to a practical extent.

Landscape Considerations – Native Delaware plants and trees will be specified for the final landscaping plan.

With regard to deed restrictions, a copy of the proposed covenants are attached as Appendix I. These covenants have been judged adequate by the Planning and Zoning solicitor.

Public Service Commission

We will follow Pipeline Safety guidelines for any expansion of natural gas or installation of a closed propane system.

Delaware State Housing Authority

We maintain that Stony Creek is, in fact, exactly the type of development described in this comment as there is excellent proximity to services, markets, employment opportunities, etc. This project is within a very short drive of economic engines not only in Delaware, but Maryland (Ocean City, Ocean Pines, etc.)

The economic benefits of in-fill development are well documented. Since this project is adjacent to existing water and sewer systems, a recently improved Route 54, and a near future police and fire substation to be built in Americana Bayside, there is a relatively small investment needed in the public infrastructure to accommodate this project. The additional real estate taxes generated by the ninety lots will far exceed the current real estate tax revenue generated by 47 acres of raw land. In addition, these homes will generate significant permit and inspection fees for the Ordinance 38 extension of sewer, the Ordinance 99 road construction, and the building permit fees.

Stony Creek is also well positioned to be served by the commercial and recreational amenities of nearby developments. The new grocery store at Americana Bayside will be less than three-quarters of a mile from Stony Creek. The shops and commercial establishments in Williamsville are approximately one mile to the west,

and there are many commercial conveniences located along the approximately four miles between the project and Fenwick Island.

Recreational benefits of the project are commensurate with the size of the development. The basketball/tennis courts, swimming pool, and walking trails provide on-site recreational opportunities. The Bayside Resort Golf Course is public, and is located approximately one and one-half miles from Stony Creek. Boat ramps, kayak opportunities, the beach, and the associated beach amusements, all exist within five miles of the project.

In summary, residents of Stony Creek will have excellent access and proximity to all types of opportunities and conveniences.

Department of Education

The developer will contact the Indian River District to discuss opportunities to address educational issues. We do not believe there is great merit in challenging the claim that only 45 students will result from the build-out of this development, but the current market trends are that this housing will be most attractive to either active adults or second-home buyers. If those 45 students are spread out over the elementary through high school ages, the impact on any particular school is minor.

A bus stop will be added to the Stony Creek subdivision plat upon consultation with the School District.

Sussex County

We agree that Lots 7-11 are very close to the boundary of Henry C. Johnson Tax Ditch. We will insure that proper drainage conditions are maintained, and if the lots are in fact within the Tax District, it will be so noted upon the deeds for these lots.

With regard to Mr. Kautz's comment on open space, we agree with his computations on the amount of open space created when reducing ninety 20,000 square feet lots to an average of just over 10,000 square feet, but note that the larger size lots are specified by County Code as the minimum lot area for density computations. The open space generated by the smaller lots is tempered by the stormwater management areas, which are needed in either development scenario, and geometry, particularly with regard to road and lot layout. In fact, Mr. Kautz notes that this site has 17 acres of usable open space, which is 85% of the twenty acres generated through the smaller lots. That seems to be a relatively decent conversion between the opportunity and the geometry, especially in light of the fact that this is not an exercise wherein ninety 20,000 square feet lots are laid out, and then reduced to 10,000 square feet lots. Furthermore, if we are able to reduce the size of the pond areas through the use of BMP's, it is our intention that these areas become part of the "usable" open space. Stony Creek is also providing a basketball/tennis

court, swimming pool, and walking trails for on-site recreational opportunities, all of which are upper level amenities for a development of ninety (90) homes.

With regard to the Environmentally Sensitive Developing District report, this document was submitted with the subdivision application in July, 2006 (Appendix C). The Report begins on page 1 of the letter to Mr. Lawrence Lank, and continues through page 7.

With regard to Low Impact Design principles, we do note that the subdivision layout is basically a cluster development, which does minimize areas available for lots and private ownership. Also, the thirteen (13) guiding points advocated by "Livable Delaware" were considered the subdivision design. The applicable points were covered during the PLUS presentation, and the text of our presentation is included behind the tab labeled "PLUS Review Presentation".

Sussex County Engineering Department comments that proposed project is included in the Fenwick Island Sanitary Sewer District planning area. We have established the necessary inclusion of adjoining properties to create contiguity with the existing Sewer District. These letters are included in Appendix G behind the sewer planning maps. Specific properties include Tax Map 5-33-19 Parcels 8, 13, 13.01, 13.02, 13.03, and 13.04. The inclusion of these properties will allow the existing District to be extended, and gravity sewer will be extended westerly along Rt. 54 and northerly along New Road as shown on Sheet C2.1 of the Preliminary Plat (Appendix C), which matches the infrastructure proposed by the County on Figure 1-6 of Volume IV of the approved South Coastal Planning Area Study Update (Appendix G).

We fully understand the County requirements with regard to extending the Sewer District, Sewer Concept Plan, Sewer Construction Plan review and approval, and DNREC construction permit. We addressed these comments in some detail during the TAC process, and have included that response below.

Gravity Sewer

1. We will follow the appropriate SCED and DNREC procedures for the review and approval of sewer plans.
2. The site is within a planned sewer district.
3. SCED indicates capacity for wastewater collection and treatment.
4. We will submit appropriate Ordinance 38 plans for needed infrastructure improvements.
5. System connection charges will be paid as determined by SCED.
6. The developer will have to install the necessary regional infrastructure with anticipated connection charge credits for oversizing per regional planning.
7. The project will be capable of being annexed into a sewer district once the Sewer Concept Plan is approved. The developer has letters from necessary

adjacent property owners to establish contiguity with the existing sewer district.

8. The property and adjoining properties are adjacent to the Fenwick Sanitary Sewer District as expanded by the Americana Bayside project.
9. The sewer concept plan included with the Preliminary Plat is taken directly from the South Coastal Area Planning Study Update of July, 2005.
10. We met with SCED and investigated the possibility of joining the Johnson's Corner Sanitary Sewer District; however, the County Engineer also agrees that the infrastructure upgrade necessary to join the Fenwick SSD could be accomplished with a definite schedule, and the infrastructure would be beneficial to the County.

In closing, we would like to thank you, your staff, and the participating agencies for their time and effort spent in reviewing this project. While the engineers and developers will probably never agree with 100% of the comments generated, we do find the process beneficial, and we will make several changes to the proposed subdivision as detailed in the preceding paragraphs.

Please feel free to contact me with any questions. Thank you for your assistance in this process.

Sincerely,



James H. Willey, Jr., P.E.
Sr. Vice-President

JHW/cl

Enclosure – Letter included within Binder entitled “Stony Creek Subdivision, November 30, 2007 PLUS Comments Response Package”.

cc: Summer Hill Developments, Inc.
Attn: Mr. Steven W. Smith (w/ one encl.)

Sussex County Planning and Zoning Department
Attn: Mr. Shane Abbot, Asst. Director (w/ six encl.)

Scott & Shuman, LLC
Attn: Mr. Billy Scott (w/ one encl.)