



DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS, PHILADELPHIA DISTRICT
1650 ARCH STREET
PHILADELPHIA, PA 19103-2004

CENAP-OPR

September 17, 2025

MEMORANDUM FOR RECORD

SUBJECT: US Army Corps of Engineers (Corps) Approved Jurisdictional Determination in accordance with the "Revised Definition of 'Waters of the United States'"; (88 FR 3004 (January 18, 2023) as amended by the "Revised Definition of 'Waters of the United States'; Conforming" (8 September 2023) ,¹ NAP-2025-00204-85 1 of 1²

BACKGROUND. An Approved Jurisdictional Determination (AJD) is a Corps document stating the presence or absence of waters of the United States on a parcel or a written statement and map identifying the limits of waters of the United States on a parcel. AJDs are clearly designated appealable actions and will include a basis of JD with the document.³ AJDs are case-specific and are typically made in response to a request. AJDs are valid for a period of five years unless new information warrants revision of the determination before the expiration date or a District Engineer has identified, after public notice and comment, that specific geographic areas with rapidly changing environmental conditions merit re-verification on a more frequent basis.⁴

On January 18, 2023, the Environmental Protection Agency (EPA) and the Department of the Army ("the agencies") published the "Revised Definition of 'Waters of the United States,'" 88 FR 3004 (January 18, 2023) ("2023 Rule"). On September 8, 2023, the agencies published the "Revised Definition of 'Waters of the United States'; Conforming", which amended the 2023 Rule to conform to the 2023 Supreme Court decision in *Sackett v. EPA*, 598 U.S., 143 S. Ct. 1322 (2023) ("*Sackett*").

This Memorandum for Record (MFR) constitutes the basis of jurisdiction for a Corps AJD as defined in 33 CFR §331.2. For the purposes of this AJD, we have relied on Section 10 of the Rivers and Harbors Act of 1899 (RHA),⁵ the 2023 Rule as amended,

¹ While the Revised Definition of "Waters of the United States"; Conforming had no effect on some categories of waters covered under the CWA, and no effect on any waters covered under RHA, all categories are included in this Memorandum for Record for efficiency.

² When documenting aquatic resources within the review area that are jurisdictional under the Clean Water Act (CWA), use an additional MFR and group the aquatic resources on each MFR based on the TNW, the territorial seas, or interstate water that they are connected to. Be sure to provide an identifier to indicate when there are multiple MFRs associated with a single AJD request (i.e., number them 1, 2, 3, etc.).

³ 33 CFR 331.2.

⁴ Regulatory Guidance Letter 05-02.

⁵ USACE has authority under both Section 9 and Section 10 of the Rivers and Harbors Act of 1899 but for convenience, in this MFR, jurisdiction under RHA will be referred to as Section 10.

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as well as other applicable guidance, relevant case law, and longstanding practice in evaluating jurisdiction.

1. SUMMARY OF CONCLUSIONS.

- a. Provide a list of each individual feature within the review area and the jurisdictional status of each one (i.e., identify whether each feature is/is not a water of the United States and/or a navigable water of the United States).
 - i. Drainage Channel A: Non-jurisdictional
 - ii. Drainage Channel B: Non-jurisdictional
 - iii. Non-Tidal Forested Wetlands: Non-jurisdictional

2. REFERENCES.

- a. "Revised Definition of 'Waters of the United States,'" 88 FR 3004 (January 18, 2023) ("2023 Rule")
- b. "Revised Definition of 'Waters of the United States'; Conforming" 88 FR 61964 (September 8, 2023)
- c. *Sackett v. EPA*, 598 U.S. 651, 143 S. Ct. 1322 (2023)
- d. MEMORANDUM TO THE FIELD BETWEEN THE U.S. DEPARTMENT OF THE ARMY, U.S. ARMY CORPS OF ENGINEERS AND THE U.S. ENVIRONMENTAL PROTECTION AGENCY CONCERNING THE PROPER IMPLEMENTATION OF "CONTINUOUS SURFACE CONNECTION" UNDER THE DEFINITION OF "WATERS OF THE UNITED STATES" UNDER THE CLEAN WATER ACT (March 12, 2025)

3. REVIEW AREA. The review area is an approximately 6.1 acre parcel located on the west side of Coastal Highway approximately 0.75 miles south of the intersection of Garfield Parkway in Bethany Beach, Sussex County, Delaware. The center coordinates of the review area are 38.528287°N, -75.059148°W. The review area is mainly forested and located between a commercial property and residential housing. No blue-line features were identified within or adjacent to the subject parcel on historical USGS Topographic Quadrangles. The 1954 Bethany Beach USGS Topographic Quadrangle depicts the terminus of a blue-line feature connecting to the Assawoman Canal in the current location of the Sea Colony stormwater management pond approximately 500 feet west of the subject parcel.

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A Preliminary Jurisdictional Determination was issued by the Corps for wetlands and waters boundaries within the review area on October 25, 2016 (CENAP-OP-R-2014-1257- 23) and expired 5 years from the date of issuance. At that time, all forested wetlands and drainage channels within the property may have been jurisdictional based on the presence of a surface water connection to the navigable waters of the Assawoman Canal in accordance with USEPA and USACE guidance implementing the U.S. Supreme Court's decision in *Rapanos vs. United States*.

4. NEAREST TRADITIONAL NAVIGABLE WATER (TNW), THE TERRITORIAL SEAS, OR INTERSTATE WATER TO WHICH THE AQUATIC RESOURCE IS CONNECTED. The nearest TNW to which the aquatic resources are connected is the Assawoman Canal, approximately 3,500 feet from the review area. The Assawoman Canal is identified as an estuarine channel by the United States Fish and Wildlife Service National Wetland Inventory Mapper and is a known tidal canal. ⁶
5. FLOWPATH FROM THE SUBJECT AQUATIC RESOURCES TO A TNW, THE TERRITORIAL SEAS, OR INTERSTATE WATER. The Non-Tidal Forested Wetlands are directly abutting Drainage Channels A and B. Drainage Channels A and B connect at the northwest corner of the property. Along the western portion of the review area, Drainage Channel B flows into a manmade drainage channel that travels west for 330 linear feet into a stormwater management pond. Stormwater flows south from the pond via a culvert into a stormwater swale situated between the westbound and eastbound lanes of Westway Drive. The stormwater swale flows westward, crossing under Kent Avenue via dual culverts then discharges into a roadside drainage ditch located on the north side of Westway Drive approximately 1,000 feet west of Kent Avenue. The roadside stormwater ditch then flows southwest under Westway Drive via a culvert into a ditch identified as a blue-line feature on the 2023 Bethany Beach Bethany USGS Topographic Quadrangle. However, this ditch is not able to be visually verified on the aerial. Based on the blue-line feature, this ditch connects to the navigable waters of the Assawoman Canal approximately 950 feet southwest of Westway Drive.

⁶ This MFR should not be used to complete a new stand-alone TNW determination. A stand-alone TNW determination for a water that is not subject to Section 9 or 10 of the Rivers and Harbors Act of 1899 (RHA) is completed independently of a request for an AJD. A stand-alone TNW determination is conducted for a specific segment of river or stream or other type of waterbody, such as a lake, where upstream or downstream limits or lake borders are established.

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6. SECTION 10 JURISDICTIONAL WATERS⁷: Describe aquatic resources or other features within the review area determined to be jurisdictional in accordance with Section 10 of the Rivers and Harbors Act of 1899. Include the size of each aquatic resource or other feature within the review area and how it was determined to be jurisdictional in accordance with Section 10.⁸ N/A
7. SECTION 404 JURISDICTIONAL WATERS: Describe the aquatic resources within the review area that were found to meet the definition of waters of the United States in accordance with the 2023 Rule as amended, consistent with the Supreme Court's decision in *Sackett*. List each aquatic resource separately, by name, consistent with the naming convention used in section 1, above. Include a rationale for each aquatic resource, supporting that the aquatic resource meets the relevant category of "waters of the United States" in the 2023 Rule as amended. The rationale should also include a written description of, or reference to a map in the administrative record that shows, the lateral limits of jurisdiction for each aquatic resource, including how that limit was determined, and incorporate relevant references used. Include the size of each aquatic resource in acres or linear feet and attach and reference related figures as needed.
 - a. Traditional Navigable Waters (TNWs) (a)(1)(i): N/A
 - b. The Territorial Seas (a)(1)(ii): N/A
 - c. Interstate Waters (a)(1)(iii): N/A
 - d. Impoundments (a)(2): N/A
 - e. Tributaries (a)(3): N/A
 - f. Adjacent Wetlands (a)(4): N/A
 - g. Additional Waters (a)(5): N/A

⁷ 33 CFR 329.9(a) A waterbody which was navigable in its natural or improved state, or which was susceptible of reasonable improvement (as discussed in § 329.8(b) of this part) retains its character as "navigable in law" even though it is not presently used for commerce, or is presently incapable of such use because of changed conditions or the presence of obstructions.

⁸ This MFR is not to be used to make a report of findings to support a determination that the water is a navigable water of the United States. The district must follow the procedures outlined in 33 CFR part 329.14 to make a determination that water is a navigable water of the United States subject to Section 10 of the RHA.

8. NON-JURISDICTIONAL AQUATIC RESOURCES AND FEATURES

- a. Describe aquatic resources and other features within the review area identified in the 2023 Rule as amended as not “waters of the United States” even where they otherwise meet the terms of paragraphs (a)(2) through (5). Include the type of excluded aquatic resource or feature, the size of the aquatic resource or feature within the review area and describe how it was determined to meet one of the exclusions listed in 33 CFR 328.3(b).⁹

Drainage Channel A (0.01 acre) is located along the northern parcel boundary, while Drainage Channel B (0.03 acre) is located along the western parcel boundary. Drainage Channel A and B are connected via an 18 inch culvert along the northern parcel boundary. Both drainage channels were excavated to facilitate the flow of stormwater away from Coastal Highway and a commercial parking lot. Both drainage channels also provide drainage to an immediately abutting Forested Non-Tidal Wetland (2.69 acres) within the review area. As such, the drainage channels fail to meet the (b)(3) Certain Ditches exclusion. For these reasons, the drainage channels were evaluated under (a)(3) Tributaries.

Both drainage channels support a bed and bank and have an ordinary high water mark, likely as a result of flat topography, large impervious surface area nearby and stormwater inputs. As such, the drainage channels meet the Relatively Permanent Standard. The Forested Non-Tidal Wetland is also abutting both drainage channels.

In the *Sackett* decision, the Supreme Court concluded that the Clean Water Act’s use of “waters” encompasses only those relatively permanent, standing or continuously flowing bodies of water “forming geographical features” that are described in ordinary parlance as “streams, oceans, rivers, and lakes”, and that wetlands are part of “the waters of the United States” “when wetlands have a continuous surface connection to bodies that are waters of the United States in their own right so there is no clear demarcation between waters and wetlands”. The Drainage Channels cannot be described in ordinary parlance as a stream as they are clearly manmade, linear channels that mainly support stormwater conveyance. Furthermore, the Drainage Channels flow into a neighborhood stormwater pond with an outfall structure into a grassed swale that continues for 1,000 linear feet before entering into another roadside drainage ditch. Consistent with the *Sackett* Court “[w]etlands that are separate from traditional navigable waters cannot be considered part of those waters, even if they are located nearby,” *id.* at 678, and that “‘adjacent’ cannot include wetlands that are not part

⁹ 88 FR 3004 (January 18, 2023)

of covered ‘waters’,” *id.* at 682. This is why the plurality in *Rapanos* rejected the Corps’ practice of asserting jurisdiction over wetlands adjacent to features that themselves were not “waters of the United States” in their own right based on a hydrologic connection theory. The *Rapanos* plurality instead concluded: [O]nly those wetlands with a continuous surface connection to bodies that are “waters of the United States” in their own right, so that there is no clear demarcation between “waters” and wetlands, are “adjacent to” such waters and covered by the Act. Wetlands with only an intermittent, physically remote hydrologic connection to “waters of the United States” do not implicate the boundary-drawing problem of *Riverside Bayview*, and thus lack the necessary connection to covered waters that we described as a “significant nexus” in *SWANCC* Thus, establishing that wetlands . . . are covered by the Act requires two findings: first, that the adjacent channel contains a “wate[r] of the United States,” (i.e., a relatively permanent body of water connected to traditional interstate navigable waters); and second, that the wetland has a continuous surface connection with that water, making it difficult to determine where the “water” ends and the “wetland” begins. *Rapanos*, 547 U.S. at 742 (Scalia, J., plurality) (emphasis in original).

Because Drainage Channels A and B lack a continuous surface connection to an (a)(1) or (a)(2) waters and the Forested Non-Tidal Wetland is far removed from a covered water via non-regulated and non-relatively permanent waters including ditches, stormwater pond and a grassed swale, Drainage Channels A and B and the Forested Non-tidal Wetland do not meet the definition of Waters of the United States.

- b. Describe aquatic resources and features within the review area that were determined to be non-jurisdictional because they do not meet one or more categories of waters of the United States under the 2023 Rule as amended (e.g., tributaries that are non-relatively permanent waters; non-tidal wetlands that do not have a continuous surface connection to a jurisdictional water).

N/A

- 9. DATA SOURCES. List sources of data/information used in making determination. Include titles and dates of sources used and ensure that information referenced is available in the administrative record.

- a. Corps site visits conducted on March 13, 2024, September 17, 2024, and April 18, 2025.
- b. Wetland delineation plan identified as BOUNDARY OF WATERS OF THE U.S. INCLUDING WETLAND SUBJECT TO CORPS OF ENGINEERS

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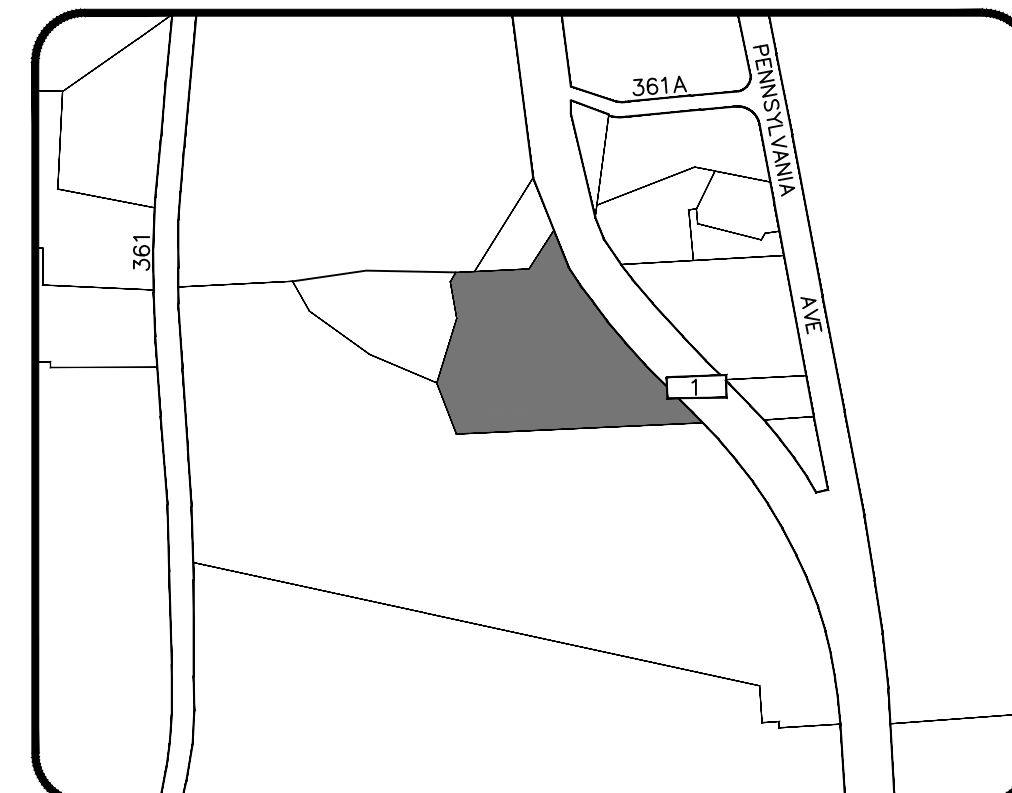
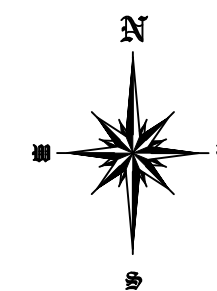
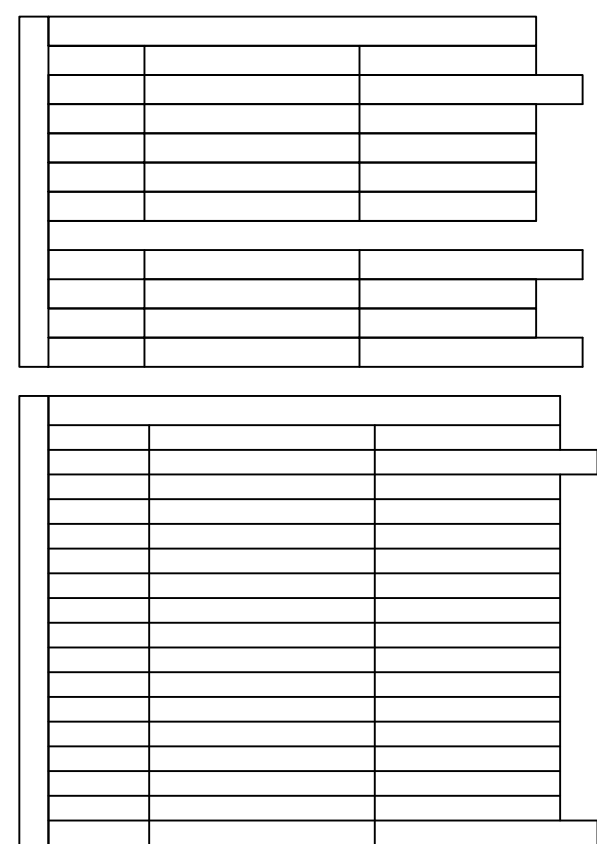
REGULATORY PROGRAM LANDS OF HICKMAN BEACH PLAZA WEST, LLC., dated June 11, 2010, and last revised on September 16, 2025, prepared by Simpler Surveying & Associate, Incorporated, 1 sheet.

- c. U.S. Army Corps of Engineers (USACE) REQUEST FOR JURISDICTIONAL DETERMINATION (JD), dated May 14, 2025.
 - d. Letter with appendices listed below prepared by Kenneth W. Redinger Environmental Services, dated June 23, 2025.
 - e. APPENDIX A – Site Maps (5 total), dated May 15, 2025.
 - f. APPENDIX B – HISTORICAL AERIAL PHOTOGRAPHY (12 TOTAL), dated May 15, 2025.
 - g. APPENDIX C – WETLAND DETERMINATION DATA FORMS (2 TOTAL), dated June 3, 2025.
 - h. APPENDIX D – SITE PHOTOS (22 TOTAL), dated April 15, 2025 & June 3, 2025.
 - i. APPENDIX E – BLUE LINE FEATURE FROM 1954 BETHANY BEACH USGS TOPOGRAPHIC QUADRANGLE, dated April 23, 2025.
 - j. APPENDIX F – WETLAND DELINEATION REPORT, prepared by Environmental Resources, Incorporated, dated December 18, 2014.
 - k. APPENDIX G – PRELIMINARY JURISDICTIONAL DETERMINATION, CENAP-OP-R-2014-1257-23, dated October 25, 2016.
10. OTHER SUPPORTING INFORMATION. On Thursday, August 14, 2025, the consultant representing the applicant provided images of Drainage Channel B and the stormwater swale between Westway Drive in a dry state. Furthermore, the consultant provided a video showing artificial irrigation feeding the stormwater pond to which Drainage Channel B drains, in order to maintain a permanent pool level. This information further supports that Drainage Channels A and B lack a continuous surface connection to an (a)(1) or (a)(2) waters and the Forested Non-Tidal Wetland is far removed from a covered water via ditches, stormwater pond and a grassed swale.

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11. NOTE: The structure and format of this MFR were developed in coordination with the EPA and Department of the Army. The MFR's structure and format may be subject to future modification or may be rescinded as needed to implement additional guidance from the agencies; however, the approved jurisdictional determination described herein is a final agency action.



ZONING AND RESTRICTIONS SHOWN HEREON WERE OBTAINED BY A GENERAL REQUEST AT THE PUBLIC COUNTER OF THE LOCAL ZONING AUTHORITY. NO REPRESENTATION IS MADE FOR THE ACCURACY OR COMPLETENESS OF SAID THIRD PARTY INFORMATION. THIS FIRM IS NOT AN EXPERT IN THE INTERPRETATION OF COMPLEX ZONING ORDINANCES, COMPLIANCE IS BEYOND THE SCOPE OF THIS SURVEY. ANY USER OF SAID INFORMATION IS URGED TO CONTACT THE LOCAL AGENCY DIRECTLY.

HORIZONTAL DATUM— NAD'83 (1983 NORTH AMERICAN DATUM)

SURVEYOR NOTES

1. This plat and survey does not verify the existence or nonexistence of right-of-ways and/or easements pertaining to this property.
2. No title search provided or stipulated.
3. Deed Book Reference:
Db. 3749, Pg. 339
4. Del-D.O.T. Contract Reference:
Contract 85-063-10

WETLANDS NOTES

- 1) Routine Level on-site investigations were conducted by Kenneth W. Redinger (Professional Wetland Scientist #12162) on April 15 and April 18, 2023. The investigation was conducted in accordance with the National Wetland Inventory Manual in conjunction with the Regional Supplement to the Corps of Engineers Wetlands Delineation Manual, Second Edition, Version 2.0 (November 2010) and associated regulatory guidance documents.
- 2) The jurisdictional status of Waters of the United States, including but not limited to, is interpreted in light of the U.S. Supreme Court May 29, 2023 decision in the case of *Sackett v. Environmental Protection Agency*; U.S. Supreme Court Case No. 21-1295. The *Sackett* decision was published in the Federal Register on January 18, 2023 (Code of Federal Regulations (CFR) 33 Part 328 and 40 CFR 121.2-121.11, 121.12, 121.13, 121.14, 121.15, 121.16, 121.17, 121.18, 121.19, 121.20, 121.21, 121.22, 121.23, 121.24, 121.25, 121.26, 121.27, 121.28, 121.29, 121.30, 121.31, 121.32, 121.33, 121.34, 121.35, 121.36, 121.37, 121.38, 121.39, 121.40, 121.41, 121.42, 121.43, 121.44, 121.45, 121.46, 121.47, 121.48, 121.49, 121.50, 121.51, 121.52, 121.53, 121.54, 121.55, 121.56, 121.57, 121.58, 121.59, 121.60, 121.61, 121.62, 121.63, 121.64, 121.65, 121.66, 121.67, 121.68, 121.69, 121.70, 121.71, 121.72, 121.73, 121.74, 121.75, 121.76, 121.77, 121.78, 121.79, 121.80, 121.81, 121.82, 121.83, 121.84, 121.85, 121.86, 121.87, 121.88, 121.89, 121.90, 121.91, 121.92, 121.93, 121.94, 121.95, 121.96, 121.97, 121.98, 121.99, 121.100, 121.101, 121.102, 121.103, 121.104, 121.105, 121.106, 121.107, 121.108, 121.109, 121.110, 121.111, 121.112, 121.113, 121.114, 121.115, 121.116, 121.117, 121.118, 121.119, 121.120, 121.121, 121.122, 121.123, 121.124, 121.125, 121.126, 121.127, 121.128, 121.129, 121.130, 121.131, 121.132, 121.133, 121.134, 121.135, 121.136, 121.137, 121.138, 121.139, 121.140, 121.141, 121.142, 121.143, 121.144, 121.145, 121.146, 121.147, 121.148, 121.149, 121.150, 121.151, 121.152, 121.153, 121.154, 121.155, 121.156, 121.157, 121.158, 121.159, 121.160, 121.161, 121.162, 121.163, 121.164, 121.165, 121.166, 121.167, 121.168, 121.169, 121.170, 121.171, 121.172, 121.173, 121.174, 121.175, 121.176, 121.177, 121.178, 121.179, 121.180, 121.181, 121.182, 121.183, 121.184, 121.185, 121.186, 121.187, 121.188, 121.189, 121.190, 121.191, 121.192, 121.193, 121.194, 121.195, 121.196, 121.197, 121.198, 121.199, 121.200, 121.201, 121.202, 121.203, 121.204, 121.205, 121.206, 121.207, 121.208, 121.209, 121.210, 121.211, 121.212, 121.213, 121.214, 121.215, 121.216, 121.217, 121.218, 121.219, 121.220, 121.221, 121.222, 121.223, 121.224, 121.225, 121.226, 121.227, 121.228, 121.229, 121.230, 121.231, 121.232, 121.233, 121.234, 121.235, 121.236, 121.237, 121.238, 121.239, 121.240, 121.241, 121.242, 121.243, 121.244, 121.245, 121.246, 121.247, 121.248, 121.249, 121.250, 121.251, 121.252, 121.253, 121.254, 121.255, 121.256, 121.257, 121.258, 121.259, 121.260, 121.261, 121.262, 121.263, 121.264, 121.265, 121.266, 121.267, 121.268, 121.269, 121.270, 121.271, 121.272, 121.273, 121.274, 121.275, 121.276, 121.277, 121.278, 121.279, 121.280, 121.281, 121.282, 121.283, 121.284, 121.285, 121.286, 121.287, 121.288, 121.289, 121.290, 121.291, 121.292, 121.293, 121.294, 121.295, 121.296, 121.297, 121.298, 121.299, 121.300, 121.301, 121.302, 121.303, 121.304, 121.305, 121.306, 121.307, 121.308, 121.309, 121.310, 121.311, 121.312, 121.313, 121.314, 121.315, 121.316, 121.317, 121.318, 121.319, 121.320, 121.321, 121.322, 121.323, 121.324, 121.325, 121.326, 121.327, 121.328, 121.329, 121.330, 121.331, 121.332, 121.333, 121.334, 121.335, 121.336, 121.337, 121.338, 121.339, 121.340, 121.341, 121.342, 121.343, 121.344, 121.345, 121.346, 121.347, 121.348, 121.349, 121.350, 121.351, 121.352, 121.353, 121.354, 121.355, 121.356, 121.357, 121.358, 121.359, 121.360, 121.361, 121.362, 121.363, 121.364, 121.365, 121.366, 121.367, 121.368, 121.369, 121.370, 121.371, 121.372, 121.373, 121.374, 121.375, 121.376, 121.377, 121.378, 121.379, 121.380, 121.381, 121.382, 121.383, 121.384, 121.385, 121.386, 121.387, 121.388, 121.389, 121.390, 121.391, 121.392, 121.393, 121.394, 121.395, 121.396, 121.397, 121.398, 121.399, 121.400, 121.401, 121.402, 121.403, 121.404, 121.405, 121.406, 121.407, 121.408, 121.409, 121.410, 121.411, 121.412, 121.413, 121.414, 121.415, 121.416, 121.417, 121.418, 121.419, 121.420, 121.421, 121.422, 121.423, 121.424, 121.425, 121.426, 121.427, 121.428, 121.429, 121.430, 121.431, 121.432, 121.433, 121.434, 121.435, 121.436, 121.437, 121.438, 121.439, 121.440, 121.441, 121.442, 121.443, 121.444, 121.445, 121.446, 121.447, 121.448, 121.449,

These standard symbols will be found in the drawing



I, GREGORY M. HOOK, registered as a Professional Land Surveyor in the State of Delaware, hereby state that the information shown on this plan has been prepared under my supervision and meets the standards of practice as established by the State of Delaware Board of Professional Land Surveyors. Any changes to the property conditions, improvements, boundary or property corners after the date shown hereon shall necessitate a new review and certification for any official or legal use.

GREGORY M. HOOK, PLS 711 Date:

DATE OF MEETING: <u> JUNE 11 </u>		TIME: <u> 1:00 </u>
REVISION: TOPIC & ROAD FEATURES & DATE: <u> SEPT. 14 </u> , 2010		
DUMPSITER PULP & PROPANE TANK		
REVISION:	PRESUM. WETLANDS CAPTURE	DATE: <u>NOV. 11</u> 2010
REVISION:	ADDITIONAL WETLANDS CAPTURE	DATE: <u>JAN. 13</u> 2011
REVISION:	ROAD TRANSFORMER	DATE: <u>JAN. 13</u> 2011
REVISION:	404 WETLANDS DELINEATION	DATE: <u>OCTOBER 29</u> 2010
REVISION:	Paving, dumpsiter, etc. As-Built	DATE: <u>NOVEMBER 6</u> 2011
REVISION:	ADDITIONAL DITCH INFORMATION	DATE: <u>DECEMBER 07</u> 2011
REVISION:	Proposed, revised, and final area	DATE: <u>NOVEMBER 14</u> 2011
REVISION:	Traverseway striping	DATE: <u>JANUARY 30</u> 2010
REVISION:	5' Offset to Sign Centerline Stakeout	DATE: <u>JANUARY 14</u> 2010
REVISION:	Proposed, Ed. of, Rightway Stakeout	DATE: <u>JANUARY 29</u> 2010
REVISION:	25' Offset to Proposed Building Stakeout	DATE: <u>MAY 29</u> 2010
REVISION:	Foundation As-Built	DATE: <u>JULY 01</u> 2010
REVISION:	WETLANDS COMMENTS	DATE: <u>MAY 28</u> 2010
REVISION:	WETLANDS COMMENTS	DATE: <u>JUNE 10</u> 2010
REVISION:	WETLANDS COMMENTS	DATE: <u>JUNE 23</u> 2010
REVISION:	WETLANDS COMMENTS	DATE: <u>SEPTEMBER 16</u> 2010
REVISION:	REVISION COMMENTS	DATE: <u> </u> 2010
REVISION:	REVISION COMMENTS	DATE: <u> </u> 2010
REVISION:	REVISION COMMENTS	DATE: <u> </u> 2010
Drawn by: <u>MICHAEL LOVELAND</u> Checked by: <u>GREGORY M. HOOK</u>		

WETLANDS DRAINAGE PLAN

including wetland subject to corps of engineers regulatory program
Lands of HICKMAN BEACH PLAZA WEST, LLC.

SFAI



**SIMPLER
SURVEYING**
& ASSOCIATE, INC.

32486 POWELL FARM ROAD, FRANKFORD, DE 19945
www.delawaresurveyor.com
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P.L.S. 711