



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

NAP

September 23, 2024

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-2024-00296-85 MFR 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. Perennial/Intermittent Waters A – Section 404 jurisdictional
 - ii. Palustrine Forested Wetlands A – Section 404 Jurisdictional
 - iii. Palustrine Forested Wetlands B – Section 404 Jurisdictional
 - iv. Isolated Palustrine Forested Wetlands C – Non-jurisdictional
 - v. Ephemeral Waters A – Non-jurisdictional
 - vi. Ephemeral Waters B – Non-jurisdictional
 - vii. Ephemeral Waters C – 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., 143 S. Ct. 1322 (2023)
3. REVIEW AREA. The review area consists of approximately 126 acres and is located in the incorporated limits of the Town of Selbyville, Sussex County, Delaware. The land is identified in County tax records as Tax Map Parcels 533-11.00-35.00, 533-18.00-5.00 and 533-18.00-5.01. The coordinates for the site are 38.467703, -75.161068. The property lies to the north of State Route 54 and west of Johnson Road with frontage on Bear Hole Road. The property site is composed of 80.85 acres of active agricultural field in a corn-soybean rotation which is drained by a network of agricultural drainage channels. Irrigation is conducted for crop production. Three of these drainage channels are characterized as a perennial or intermittent

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streams totaling 1.87 acres. These channels are part of the Bear Hole Tax Ditch Association (Main, Prong 6 & Prong 7). Three other drainage channels were determined to have only ephemeral flow in accordance with the Delaware Stream Jurisdictional Determination Field Form Version 1.0. The property has 33.02 acres of upland forest and cleared maintenance easements along tax ditches. A total of 10.34 acres within the area of investigation consists of palustrine forested wetlands.

4. NEAREST TRADITIONAL NAVIGABLE WATER (TNW), THE TERRITORIAL SEAS, OR INTERSTATE WATER TO WHICH THE AQUATIC RESOURCE IS CONNECTED. Dirickson Creek is the nearest TNW to the site in which the aquatic resources flow. Dirickson Creek is approximately 1.9 miles from the site. Dirickson Creek is subject to the ebb and flow of the tide, thereby meeting the definition of a TNW.⁶
5. FLOWPATH FROM THE SUBJECT AQUATIC RESOURCES TO A TNW, THE TERRITORIAL SEAS, OR INTERSTATE WATER. Bear Hole Tax Ditch Main, Prong 6 and Prong 7, also identified as Perennial/Intermittent Waters A on the Delineation Plan, empty into the Bear Hole Tax Ditch Main and flows for 1.9 miles into Dirickson Creek.
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

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.

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.

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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): Perennial/Intermittent Waters A (Bear Hole Tax Ditch Main, Prong 6 and Prong 7) encompass approximately 1.87 acres of the property. These tax ditches exhibit a continuous bed and bank as well as an ordinary high water mark. The National Hydrography Dataset depicts the tax ditches as canal ditches. The National Wetland Inventory Mapper depicts the tax ditches as modified intermittent riverine streams. Several site visits conducted by Environmental Resource Insights between February 2022 to April 2024 verified the presence of an ordinary high water mark. USACE conducted a site visit on July 2, 2024, and confirmed the presence of an ordinary high water mark as well as flowing water, thus meeting the relatively permanent standard. For these reasons and because the tax ditches flow directly into an (a)(1) water (Diricksons Creek), Perennial/Intermittent Waters A meets the definition of an (a)(3) tributary.
- f. Adjacent Wetlands (a)(4): Palustrine Forested Wetlands A (5.01 acres) is directly abutting a channel to the west that is characterized as a perennial stream as well as Ephemeral Waters B to the east. Palustrine Forested Wetlands A has a continuous surface connection to the Bear Hole Tax Ditch Main and therefore meets the definition of an (a)(4) adjacent wetland.

Palustrine Forested Wetlands B (4.99 acres) continues outside of the limits of investigation. However, Wetlands B is directly abutting Bear Hole Tax Ditch Prong 7 to the north and a stream to the west that flows into Bear Hole Tax Ditch Prong 7. Because Wetlands B is directly abutting an (a)(3) tributary, it meets the definition of an (a)(4) adjacent wetland.

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- g. Additional Waters (a)(5): N/A

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

Ephemeral Waters A 0.03 acre. This ditch is a small spur ditch that empties into Bear Hole Tax Ditch Prong 6 (Waters A). The ditch reach is excavated wholly in dry land, drains only dry land and does not carry a relatively permanent flow of water. Additionally, the ditch lacks a bed and bank, wrack deposits and alluvial deposits that would be strong indicators of relatively permanent or standing water. Furthermore, application of the Delaware Stream Jurisdictional Determination Field Form resulted in a determination that the ditch meets the ephemeral hydrology classification. For these reasons, the ditch meets the (b)(3) ditch exclusion.

Ephemeral Waters C is 0.04 acre. This ditch is a small spur ditch that empties into Bear Hole Tax Ditch Prong 6 (Waters A). The ditch reach is excavated wholly in dry land, drains only dry land and does not carry a relatively permanent flow of water. Additionally, the ditch lacks a bed and bank, wrack deposits and alluvial deposits that would be strong indicators of relatively permanent or standing water. Furthermore, application of the Delaware Stream Jurisdictional Determination Field Form resulted in a determination that the ditch meets the ephemeral hydrology classification. For these reasons, the ditch meets the (b)(3) ditch exclusion.

- 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).

Isolated Palustrine Forested Wetlands C is approximately 0.34 acre and is geographically separated from any other aquatic resources and does not have a continuous surface connection to the Bear Hole Tax Ditch. Because Wetlands C

⁹ 88 FR 3004 (January 18, 2023)

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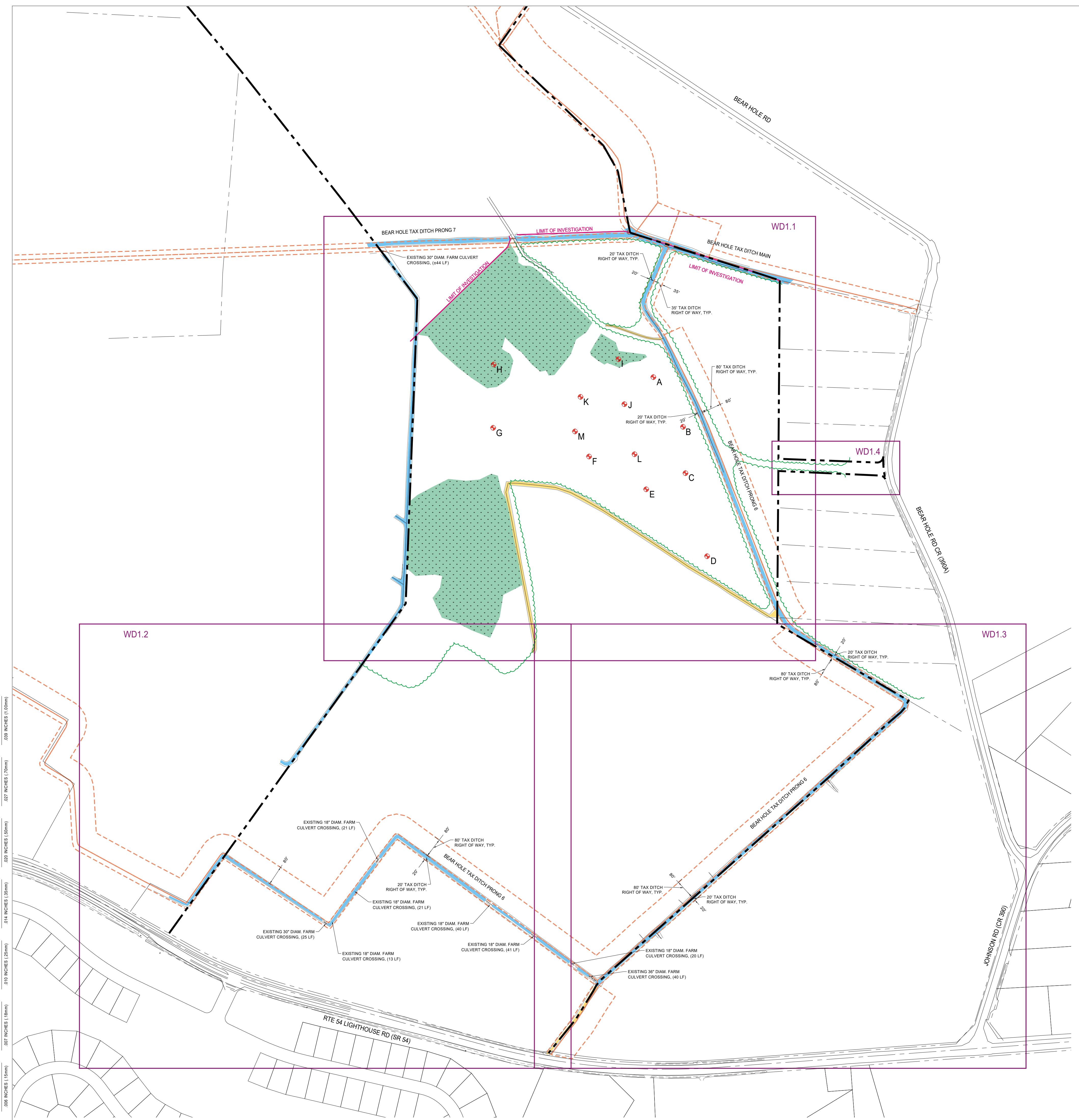
SUBJECT: 2023 Rule, as amended, Approved Jurisdictional Determination in Light of *Sackett v. EPA*, 143 S. Ct. 1322 (2023), NAP-2024-00296-85

does not have a continuous surface connection to an (a)(1) through (a)(3) waters, it does not meet the definition of an (a)(4) wetland.

Ephemeral Waters B is 0.55 acre. The ditch reach is excavated wholly in dry land and does not carry a relatively permanent flow of water. Additionally, the ditch lacks a bed and bank, wrack deposits and alluvial deposits that would be strong indicators of relatively permanent or standing water. Furthermore, application of the Delaware Stream Jurisdictional Determination Field Form resulted in a determination that the ditch meets the ephemeral hydrology classification. However, because the ditch is abutting Wetlands A it does not meet the ditch exclusion. Because the ditch does not meet the relatively permanent standard, Waters B does not meet the definition of an (a)(3) tributary.

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. USACE site visit conducted on July 2, 2024.
 - b. WETLAND DELINEATION REPORT KINGFISHER RESIDENTIAL COMMUNITY TAX MAP PARCELS 533-11.00-35.00, 533-18.00-5.00 AND 533-18.00-5.01 SELBYVILLE, BALTIMORE HUNDRED, SUSSEX COUNTY, DE, dated August 27, 2024, prepared by Environmental Resource Insights.
 - c. Wetland delineation plan identified as KINGFISHER TOWN OF SELBYVILLE BALITMORE HUNDRED SUSSEX COUNTY, DELAWARE, dated August 2024, prepared by George, Miles & Buhr, LLC, 9 sheets.
 - d. U.S. Army Corps of Engineers (USACE) Request for Jurisdictional Determination (JD) ENG Form 6247, dated July 3, 2024.
10. OTHER SUPPORTING INFORMATION. N/A

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.



SITE DATA:

CITE DATA

WEST SELBYVILLE DEVELOPMENT, LLC.
4750 OWINGS MILLS BLVD,
OWINGS MILLS, MD 21117
PHONE: 410-356-9900
CONTACT: JON HOFFMAN

CONTACT: CHRISTOPHER J. PFEIFER

ADKINS LAND SURVEYING LLC
212 E FRONT STREET
LAUREL, DE 19956
PHONE: 302-875-3555
CONTACT: STEVE M.

3817 DUPONT BLVD
SELBYVILLE, DE 19975
PHONE: 302-436-9637
CONTACT: ED LAUNAY

TAX MAP #:	533-11.00-35.00
DEED REFERENCE:	BOOK: 5514, PAGE: 89
TAX MAP #:	533-18.00-5.00
DEED REFERENCE:	BOOK: 5632, PAGE: 253
TAX MAP #:	533-18.00-5.01
DEED REFERENCE:	BOOK: 1121, PAGE: 105

533-11.00-35.00
BOOK: 5514 PAGE: 89

533-18.00-5.00

533-18.00-5.01
BOOK: 1121, PAGE: 105

ACREAGE TABLE:

TOTAL SITE AREA	±166.17 ACRES
LIMIT OF WETLAND INVESTIGATION	±126.08 ACRES
UPLAND AGRICULTURAL FIELD (INCLUDES UPLAND EPHEMERAL DRAINAGE CHANNELS)	±80.85 ACRES
UPLAND FOREST & CLEARED DRAINAGE CHANNEL ACCESS EASEMENTS	±33.02 ACRES
PALUSTRINE FORESTED WETLANDS	±10.34 ACRES
EXISTING PERENNIAL STREAM (DNREC SUBAQUEOUS LANDS)	±1.87 ACRES
UNCLASSIFIED LAND, NOT PART OF WETLAND INVESTIGATION	±40.09 ACRES

LEGEND

- | | |
|--|---|
| | PROPERTY BOUNDARY |
| | LIMIT OF WETLAND INVESTIGATION |
| | ADJACENT PROPERTY LINE |
| | TAX DITCH RIGHT OF WAY |
| | WOODSLINE |
| | EXISTING CULVERT CROSSING |
| | ORDINARY HIGH WATER LINE |
| | EXISTING PERENNIAL OR INTERMITTENT STREAM CHANNEL |
| | EPHEMERAL MAN-MADE DRAINAGE CHANNELS
(NOT SUBJECT TO CORPS OF ENGINEERS
REGULATORY PROGRAM) |
| | PALUSTRINE FORESTED WETLANDS |

WETLANDS CERTIFICATION:

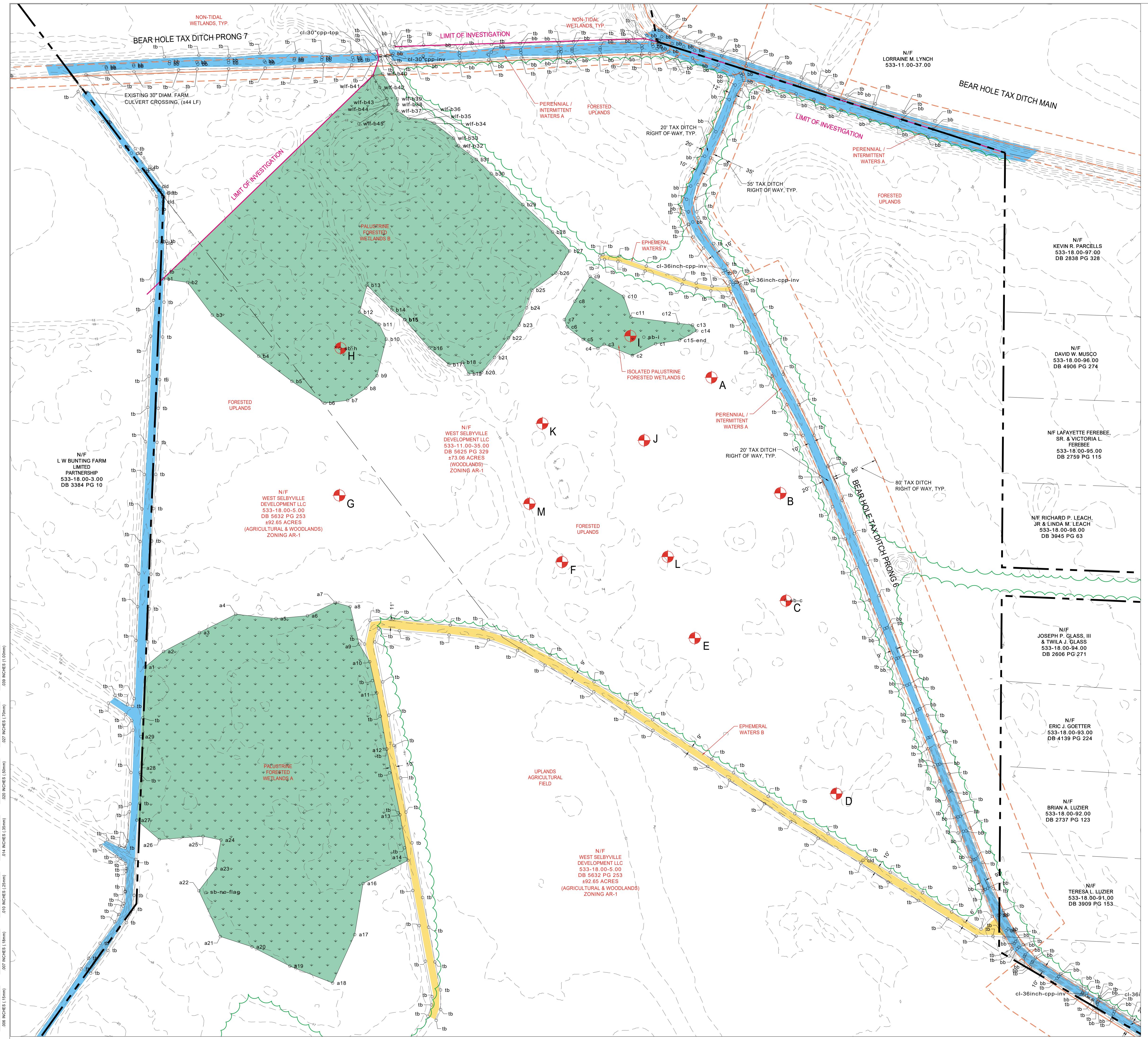
I, EDWARD M. LAUNAY, SPWS, STATE THAT THE BOUNDARIES OF WATERS OF THE UNITED STATES INCLUDING WETLANDS SUBJECT TO THE CORPS OF ENGINEERS REGULATORY PROGRAM DELINEATED WITHIN THIS PROPERTY AND AS ILLUSTRATED ON THESE PLANS HAS BEEN DETERMINED USING MY PROFESSIONAL JUDGEMENT IN ACCORDANCE WITH THE 1987 CORPS OF ENGINEERS WETLANDS DELINEATION MANUAL AND ALL CURRENTLY APPLICABLE SUPPLMENTAL GUIDANCE INCLUDING THE ATLANTIC AND GULF COAST REGIONAL MANUAL (VERSION 2.0). THIS DELINEATION HAS NOT BEEN CONDUCTED FOR USDA PROGRAM OR AGRICULTURAL PURPOSES.

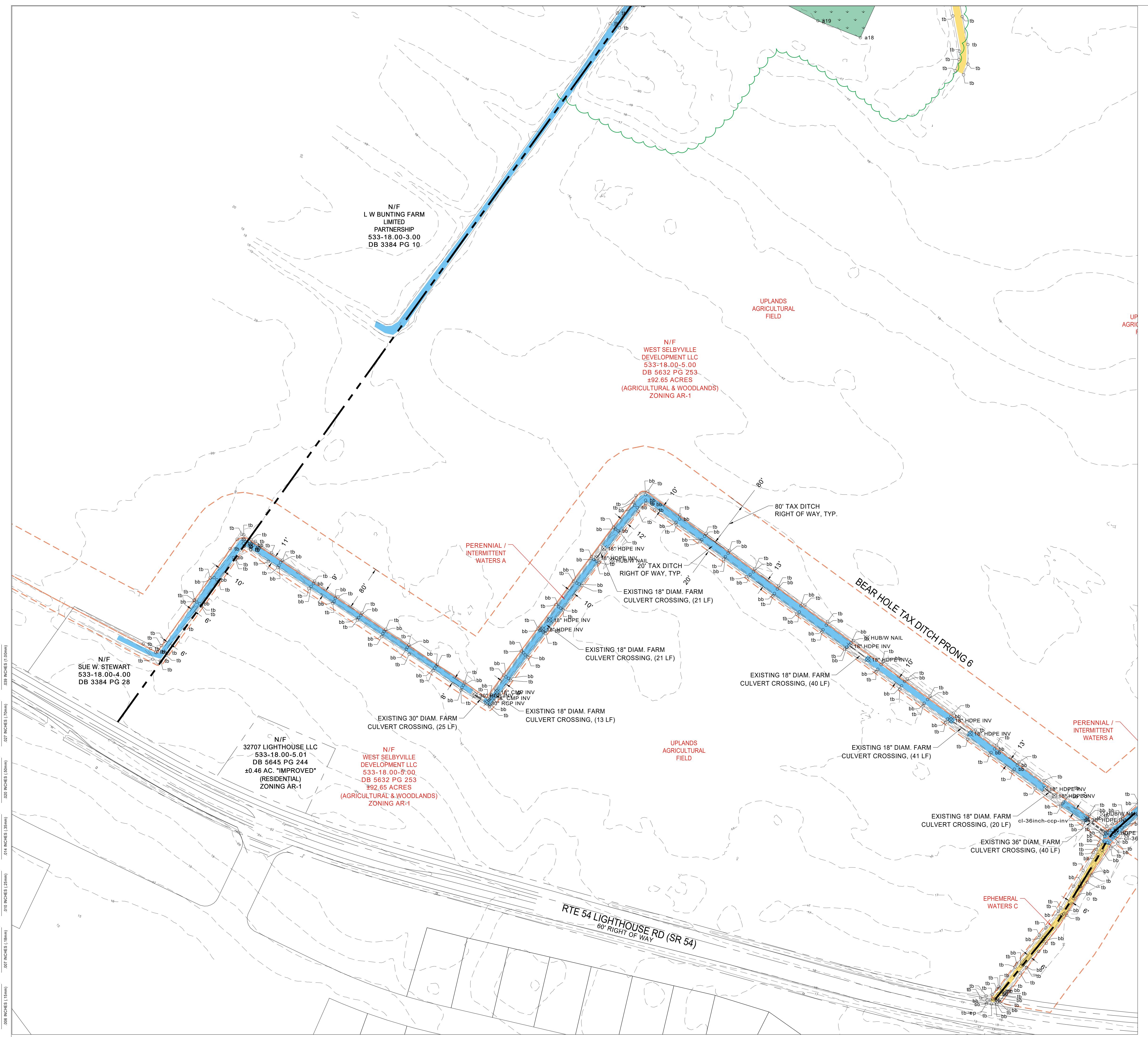
IN ACCORDANCE WITH DEPARTMENT OF NATURAL RESOURCES AND ENVIRONMENTAL CONTROL WETLAND MAPS, THERE ARE NO STATE (DNREC) REGULATED WETLANDS ON THE SITE

EDWARD M. LAUNAY, PWS NO. 875 DATE
SOCIETY OF WETLAND SCIENTISTS
CORPS OF ENGINEERS,
CERTIFIED WETLAND DELINEATOR WDCP93MD0510036B

WETLAND DELINEATION PLAN KEY SHEET

SCALE	: 1" = 200'	SHEET
DESIGN BY	: RLM	
DRAWN BY	: RLM	
CHECKED BY	:	
SMB FILE	: 220013	
ATE	: AUG 2024	WD1





**PRINTS ISSUED FOR:
DRAWINGS STAGE**

The logo consists of a large, bold, black monogram. The letter 'G' is on the left, oriented vertically with its top curve pointing right. To its right is a vertical bar, and further right is the letter 'B', also oriented vertically with its top curve pointing right. The letters are thick and have a slightly irregular, hand-drawn appearance.

KINGSTON
TOWN OF SELBYVILLE
BALTIMORE HUNDRED
SUSSEX COUNTY, DELAWARE

ACREAGE TABLE:

TOTAL SITE AREA	±166.17 ACRES
LIMIT OF WETLAND INVESTIGATION	±126.08 ACRES
UPLAND AGRICULTURAL FIELD	±80.85 ACRES
INCLUDES UPLAND EPHEMERAL DRAINAGE CHANNELS)	
UPLAND FOREST & CLEARED DRAINAGE CHANNEL ACCESS EASEMENTS	±33.02 ACRES
PALUSTRINE FORESTED WETLANDS	±10.34 ACRES
EXISTING PERENNIAL STREAM DNREC SUBAQUEOUS LANDS)	±1.87 ACRES
UNCLASSIFIED LAND, NOT PART OF WETLAND INVESTIGATION	±40.09 ACRES

LEGEND

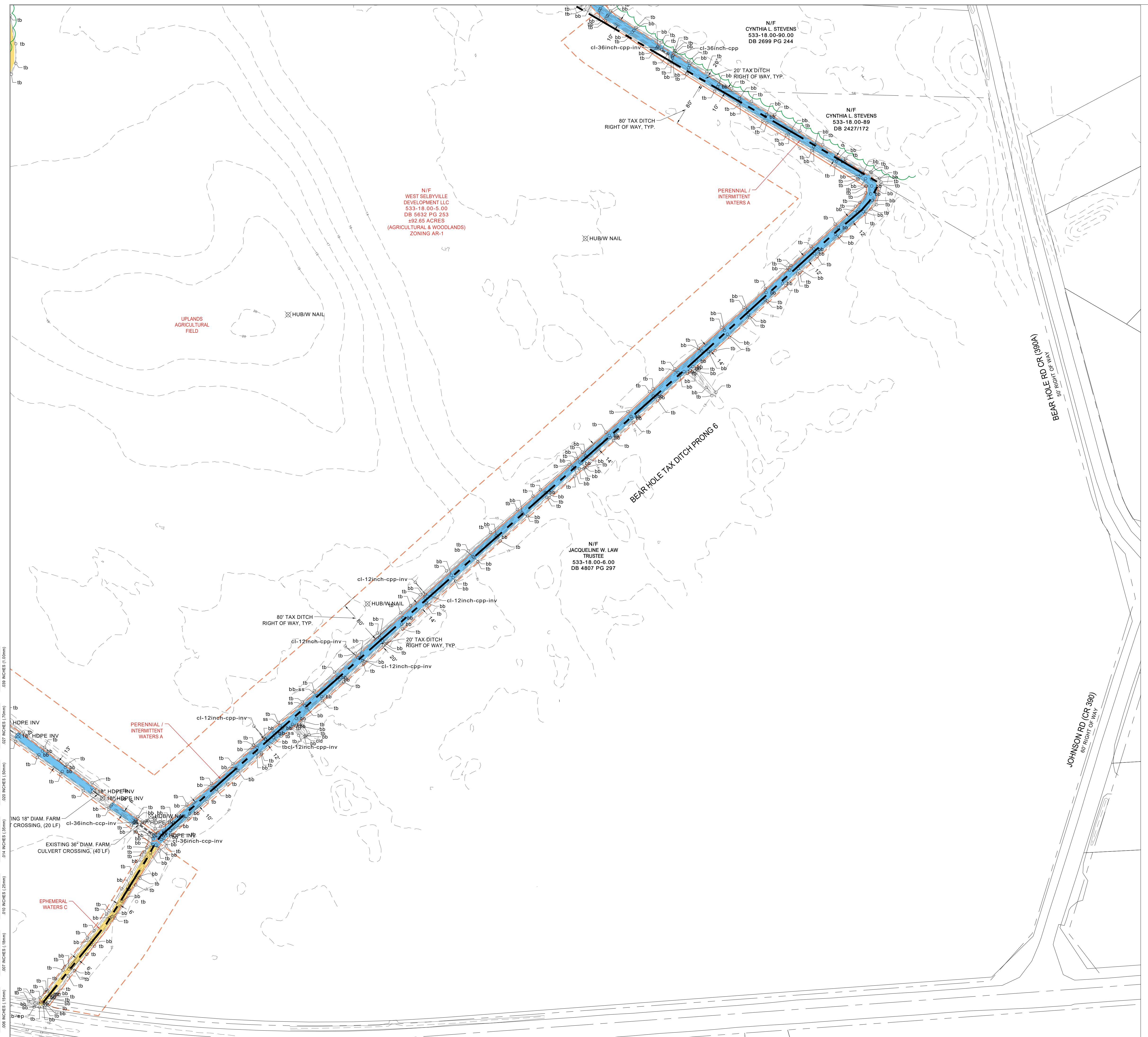
	PROPERTY BOUNDARY
	LIMIT OF WETLAND INVESTIGATION
	ADJACENT PROPERTY LINE
	TAX DITCH RIGHT OF WAY
	WOODSLINE
	EXISTING CULVERT CROSSING
	ORDINARY HIGH WATER LINE
	EXISTING PERENNIAL OR INTERMITTENT STREAM CHANNEL
	EPHEMERAL MAN-MADE DRAINAGE CHANNELS (NOT SUBJECT TO CORPS OF ENGINEERS REGULATORY PROGRAM)
	PALUSTRINE FORESTED WETLANDS
	DATA POINT LOCATION

WETLAND DELINEATION PLAN DETAIL

SHEET NO.

WD1.2

H2024 GEORGE, MILES & BUHR,





WATER LEVEL BORING DATA

DEPTH TO GROUNDWATER IN INCHES

BORING LOCATION	DATE 02-12-22	DATE 02-17-22	DATE 03-07-22	DATE 03-15-22	DATE 03-30-22	DATE 04-12-22
A 38.470981 -75.159628	30"	35"	38"	28"	33"	27"
B 38.470421 -75.159206	37"	40"	42"	34"	42"	37"
C 38.469901 -75.159173	39"	45"	46"	41"	48"	41"
D 38.468967 -75.158867	20"	24"	25"	20"	24"	22"
E 38.469721 75.159735		48"	50"	41"	44"	41"
F 38.470091 75.160550		43"	45"	35"	43"	38"
G 38.470416 75.161919		42"	44"	32"	32"	31"
H 38.471128 75.161909		18"	19"	10"	11"	07" (
I 38.471183 75.160126		21"	22"	12"	20"	15" (
J 38.470678 75.160043		36"	38"	29"	36"	32"
K 38.470761 75.160069		52"	dry at 52"	46"	52"	34"
L 38.470115 75.159900		dry at 52"	dry at 52"	50"	dry at 52"	49"
M 38.470373 75.160750		50"	53"	44"	45"	42"

**PRINTS ISSUED FOR:
DRAWINGS STAGE**

**GEORGE, MILES & BUHR, LLC
ARCHITECTS & ENGINEERS**

SALISBURY • BALTIMORE • SEAFORD

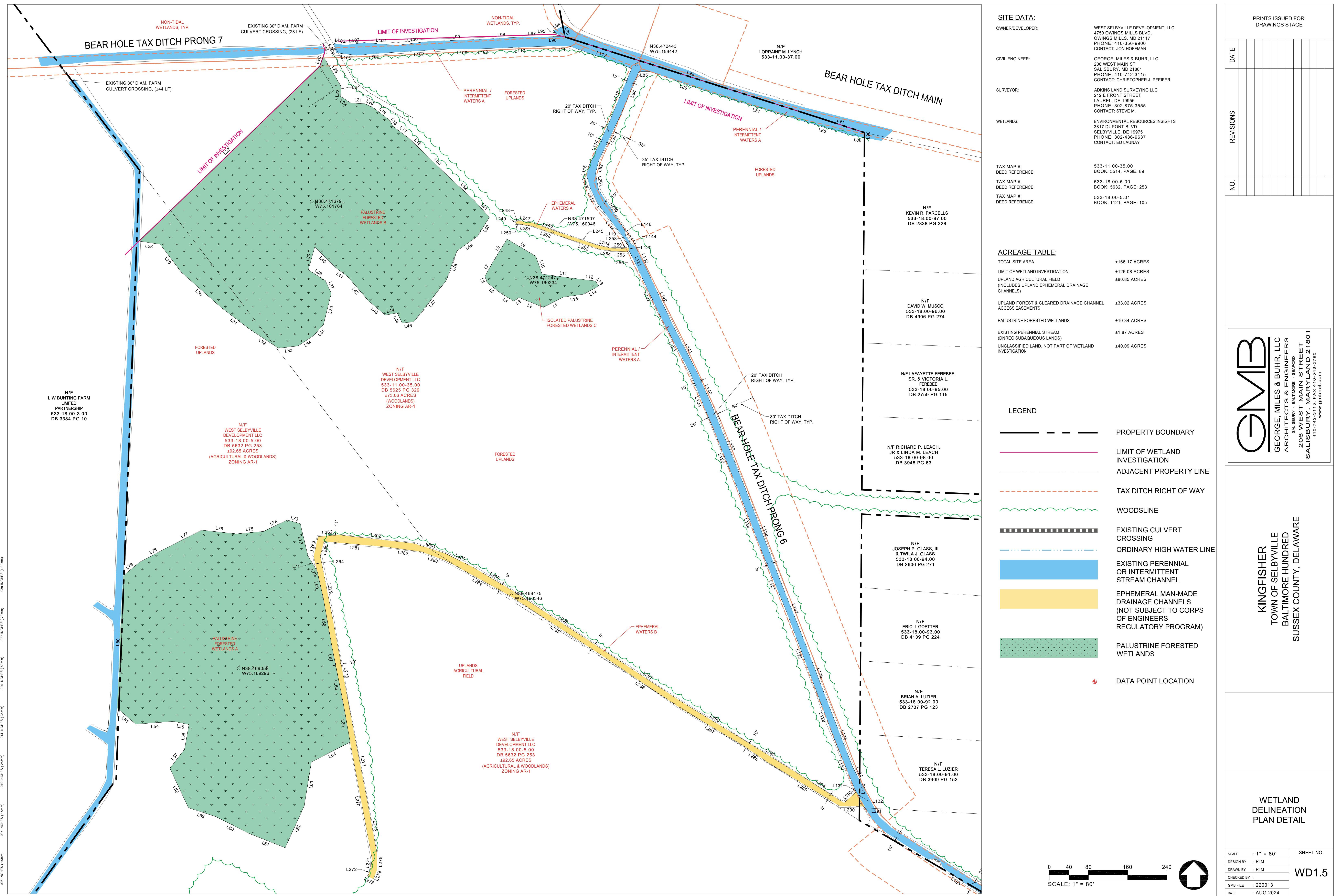
206 WEST MAIN STREET
SALISBURY, MARYLAND 21801

110-7412-2115 FAX 410-549-5700

**KINGFISHER
TOWN OF SELBYVILLE
BALTIMORE HUNDRED
SUSSEX COUNTY, DELAWARE**

WETLAND DELINEATION PLAN DETAIL & HYDROLOGY DATA

CALE	: NO SCALE	SHEET NO.
DESIGN BY	: RLM	
DRAWN BY	: RLM	
CHECKED BY	:	
SMB FILE	: 220013	
DATE	: AUG 2024	





TOWN OF SELBYVILLE
BALTIMORE HUNDRED
SUSSEX COUNTY, DELAWARE

ACREAGE TABLE:

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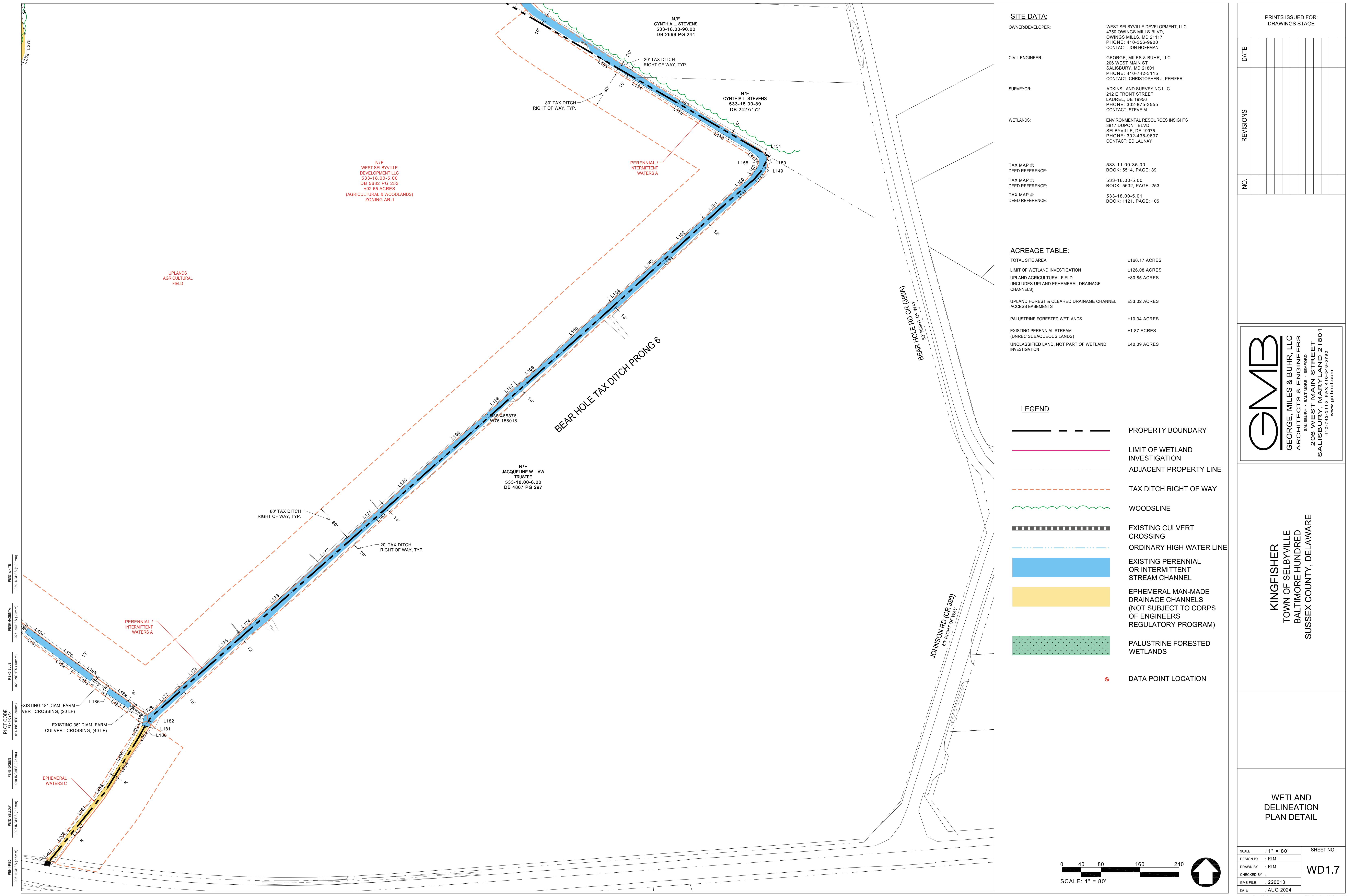
LEGEND

- | | |
|--|---|
| | PROPERTY BOUNDARY |
| | LIMIT OF WETLAND INVESTIGATION |
| | ADJACENT PROPERTY LINE |
| | TAX DITCH RIGHT OF WAY |
| | WOODSLINE |
| | EXISTING CULVERT CROSSING |
| | ORDINARY HIGH WATER LINE |
| | EXISTING PERENNIAL OR INTERMITTENT STREAM CHANNEL |
| | EPHEMERAL MAN-MADE DRAINAGE CHANNELS (NOT SUBJECT TO CORPS OF ENGINEERS REGULATORY PROGRAM) |
| | PALUSTRINE FORESTED WETLANDS |
| | DATA POINT LOCATION |

WETLAND DELINEATION PLAN DETAIL

WD1.6

24 GEORGE, MILES & BUHR,



PEN-RED .008 INCHES (.15mm)

PEN-GREEN .007 INCHES (.18mm)

PEN-BLUE .014 INCHES (.35mm)

.027 INCHES (.70mm)

PEN-BLACK

.039 INCHES (1.0mm)

LINE TABLE		
LINE	LENGTH	DIRECTION
L1	45.93'	S62°59'53"W
L2	53.49'	N68°10'40"W
L3	13.08'	S56°21'26"W
L4	30.58'	N58°48'46"W
L5	35.93'	N52°02'29"W
L6	13.67'	N19°55'12"W
L7	37.23'	N29°28'45"E
L8	51.38'	N31°42'19"E
L9	68.47'	S59°12'54"E
L10	38.79'	S19°22'23"E
L11	84.35'	S82°30'06"E
L12	25.22'	S83°27'33"E
L13	12.65'	S35°52'56"E
L14	34.70'	S61°04'36"W
L15	42.57'	S81°42'30"W
L16	36.30'	N46°10'03"W
L17	39.77'	N53°02'14"W
L18	16.20'	N31°34'42"W
L19	43.10'	N52°41'17"W
L20	17.35'	N65°46'29"W
L21	28.83'	N87°12'02"W
L22	24.78'	N56°53'46"W
L23	11.04'	N6°38'26"E
L24	9.93'	N3°42'20"W
L25	70.93'	N30°23'55"W
L26	21.44'	S19°55'17"W
L27	514.29'	S45°55'03"W
L28	43.70'	S81°24'17"E
L29	72.03'	S37°07'03"E
L30	109.28'	S48°32'54"E
L31	73.28'	S52°44'38"E
L32	69.76'	S56°37'44"E
L33	40.19'	N83°06'00"E
L34	38.53'	N56°31'03"E
L35	29.72'	N41°29'01"E
L36	66.49'	N14°07'00"E
L37	28.46'	N25°42'42"W
L38	40.98'	N57°49'55"W
L39	49.15'	N15°35'44"E
L40	61.57'	S45°03'57"E
L41	29.05'	S53°20'07"E
L42	65.74'	S40°43'23"E
L43	45.24'	S49°41'20"E
L44	24.47'	N79°18'47"E
L45	23.03'	S26°29'50"E
L46	23.47'	N84°13'46"E
L47	106.37'	N38°23'36"E
L48	65.49'	N20°00'10"E
L49	52.00'	N54°33'38"E
L50	45.80'	N31°48'52"E
L51	45.24'	N42°09'35"W
L52	70.97'	N47°06'46"W
L53	77.68'	N45°52'23"W
L54	77.22'	N85°45'29"E
L55	32.30'	S78°28'15"E
L56	51.36'	S10°12'44"W
L57	49.00'	S37°35'42"W
L58	89.07'	S25°07'37"E
L59	58.77'	S71°59'33"E
L60	74.70'	S63°03'31"E
L61	81.02'	S68°23'51"E
L62	93.71'	N24°31'16"E
L63	91.22'	N9°16'50"E
L64	89.03'	N62°51'08"E
L65	81.47'	N10°01'00"W
L66	71.86'	N11°20'32"W
L67	46.30'	N11°20'32"W
L68	100.28'	N10°03'14"W
L69	56.45'	N12°56'18"W
L70	2.02'	N30°59'20"W
L71	34.24'	N30°59'20"W
L72	67.74'	N13°28'53"W
L73	27.64'	N74°38'30"W
L74	53.77'	S64°16'41"W
L75	55.64'	S84°55'31"W
L76	71.39'	N83°56'18"W
L77	71.66'	S63°17'09"W
L78	71.35'	S62°04'46"W
L79	41.33'	S50°19'58"W
L80	274.92'	S2°11'21"W

LINE TABLE		
LINE	LENGTH	DIRECTION
L81	45.93'	S49°14'20"E
L82	25.90'	N13°45'08"E
L83	108.08'	N25°36'59"E
L84	92.73'	N22°41'00"E
L85	21.14'	N89°35'17"E
L86	153.76'	S70°53'56"E
L87	159.04'	S73°06'05"E
L88	122.65'	S73°42'01"E
L89	25.35'	S79°43'41"E
L90	10.46'	N0°26'00"E
L91	107.82'	N71°57'49"W
L92	534.98'	N72°21'46"W
L93	21.87'	N11°14'21"W
L94	21.32'	S66°46'31"W
L95	18.78'	S50°00'34"E
L96	31.19'	S88°49'19"W
L97	53.18'	S89°26'59"W
L98	71.80'	S86°36'41"W
L99	113.19'	S87°43'29"W
L100	65.04'	S82°58'37"W
L101	68.11'	N85°21'20"W
L102	37.95'	S82°13'49"W
L103	24.21'	N82°23'22"W
L104	19.88'	S14°43'31"E
L105	41.71'	S83°16'24"E
L106	70.34'	N85°23'13"E
L107	114.88'	N86°39'32"E
L108	61.37'	N89°31'11"E
L109	23.95'	S10°32'19"E
L110	127.37'	S87°44'52"E
L111	37.60'	S89°23'57"E
L112	135.22'	S70°24'03"E
L113	128.74'	S22°44'11"W
L114	90.98'	S25°09'36"E
L115	18.16'	S12°13'33"W
L116	28.12'	S16°36'05"E
L117	34.35'	S25°32'22"E
L118	102.15'	S72°26'37"E
L119	8.84'	S7°14'27"E
L120	14.36'	S7°14'27"E
L121	55.03'	S25°42'43"E
L122	93.06'	S45°19'27"E
L123	134.60'	S27°42'02"E
L124	115.63'	S22°14'38"E
L125	135.33'	S22°17'16"E
L126	150.14'	S21°05'19"E
L127	122.50'	S22°22'52"E
L128	180.00'	S20°36'17"E
L129	95.94'	S20°24'46"E
L130	113.90'	S22°18'26"E
L131	5.16'	S29°41'01"E
L132	18.40'	S29°41'01"E
L133	35.39'	N0°26'00"E
L134	29.45'	N28°04'37"W
L135	136.23'	S11°11'41"W
L136	135.99'	N20°50'16"W
L137	146.28'	N21°37'28"W
L138	192.84'	N20°44'30"W
L139	182.87'	N22°02'45"W
L140	65.60'	S63°25'46"W
L141	119.92'	N27°08'49"W
L142	114.50'	N25°04'42"W
L143	60.11'	N26°18'25"W
L144	11.50'	N56°34'28"W
L145	19.69'	N32°14'35"W
L146	13.99'	N10°26'35"W
L147	74.51'	N49°25'03"E
L148	20.87'	N41°19'52"E
L149	25.57'	N28°26'35"E
L150	7.89'	N11°44'46"E
L151	10.40'	N39°18'18"W
L152	385.39'	N59°46'05"W
L153	21.24'	S54°22'34"E
L154	143.90'	S58°13'34"E
L155	54.00'	S58°37'30"E
L156	141.37'	S58°35'28"E
L157	22.62'	S51°39'59"E
L158	14.26'	S0°27'04"W
L159	32.77'	S34°56'02"W
L160	42.83'	S49°16'04"W

LINE TABLE		
LINE	LENGTH	DIRECTION
L161	104.46'	S48°00'10"W
L162	72.38'	S47°46'02"W
L163	103.07'	S47°55'15"W
L164	80.98'	S49°29'26"W
L165	148.33'	S47°23'56"W
L166	93.73'	S49°12'46"W
L167	16.97'	S45°19'48"W
L168	62.45'	S48°26'08"W
L169	151.73'	S49°03'53"W
L170	138.72'	S47°29'24"W
L171	57.15'	S48°56'35"W
L172	175.24'	S47°55'53"W
L173	103.12'	S47°06'41"W
L174	54.03'	S50°41'26"W
L175	67.67'	S47°09'24"W
L176	100.62'	S48°08'50"W
L177	59.60'	S47°56'36"W
L178	26.96'	S59°32'00"W
L179	19.29'	S13°23'24"W
L180	5.99'	S69°03'11"E
L181	1.24'	S28°41'10"E
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