

SPECIAL USE PERMIT SP202200032

TO: Rebecca Ragsdale
Planning Manager
County of Albemarle, Community Development Department

FROM: Daniel C. Hyer, PE
Line and Grade Civil Engineering

DATE: Initial Submission: 11/21/2022
Revised Submission: 5/1/2023

RE: The Miller School of Albemarle
Special Use Permit Application Narrative

PROJECT DETAILS:

Applicant: The Miller School of Albemarle
Consultant: Line and Grade Civil Engineering | Daniel C. Hyer, PE
Name of Project: MSA Special Use Permit
Short Description: Special Use Permit for Independent Educational Institution
Existing/Proposed Site: 1000 Samuel Miller Loop, Charlottesville, VA 22903

PROPERTY DETAILS:

Parcel ID Number: 07200-00-00-03200
Short Parcel ID: 72-32
Total Acres: 1,046.98
Owner: The Miller School of Albemarle
Property Address: 1000 Samuel Miller Loop, Charlottesville, VA 22903
Current Occupant: The Miller School
Magisterial District: Samuel Miller
Zoning: Rural Area (RA)
Proffered: No
ZMAs Related to Proffers: None
Comprehensive Plan Area: Rural Area
Comprehensive Plan Use: Residential
Land Use: Independent School, Conservation Easement
Surrounding Uses: Residential, to the North, South, East, and West

EXECUTIVE SUMMARY

The Miller School of Albemarle would like to formally request a special use permit (SP) be applied to their campus in Albemarle County, Virginia. The property is identifiable by Tax Map Parcel Number 72-32. The school is located, aptly, within the Samuel Miller Magisterial District along Miller School Road in Western Albemarle County. The current use is an independent school, and the proposed use is also an independent school. This SP seeks to bring the existing non-conforming use of the campus into conformance with the County's zoning code and to prepare the way for the school's future -- to continue their hands-on approach to teaching combined with rigorous and supportive academic programs.

Descriptive Images and Photos

Please note: All maps shown within this SP document are included in Appendix B and are shown at a larger scale.

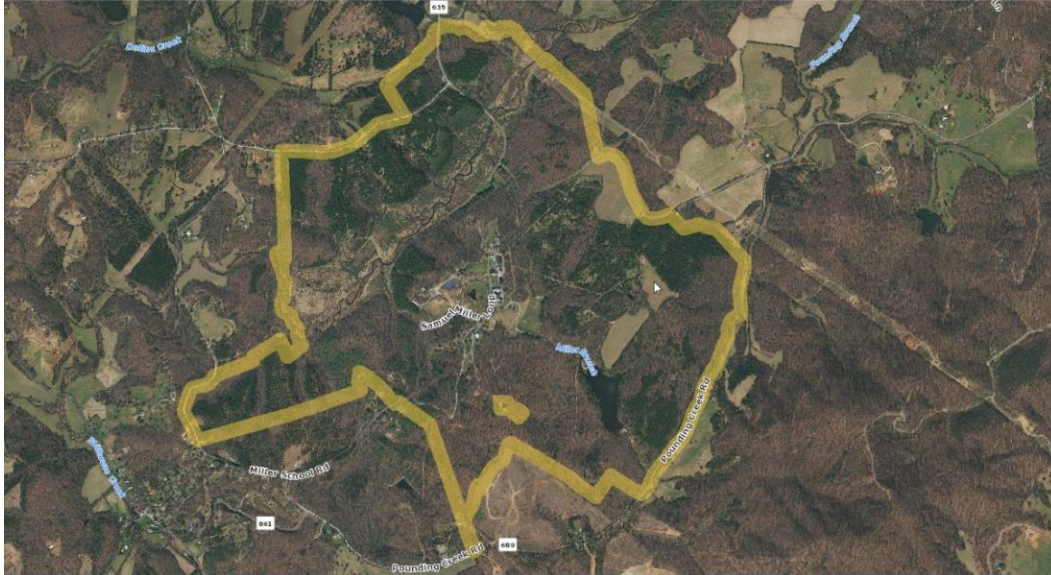


Image 1 - Aerial Image from Albemarle County GIS showing 1,047 Acre Parcel Boundary



Photograph 1 - Aerial Image of the Miller School of Albemarle and surrounding grounds. 637 acres of the campus have been put into a conservation easement held by the Land Trust of Virginia.



Photograph 2 - Old Main. One of three buildings the school has registered with the Virginia Department of Historic Resources



Photograph 3 - Caton Hall. One of three buildings the school has registered with the Virginia Department of Historic Resources.

PART 1: PROJECT PROPOSAL

A. Background

The Miller School of Albemarle (MSA) has been educating students on this campus since it was founded in 1878 with a bequest from Samuel Miller, who was raised in Batesville, Virginia and later became a successful businessman. His Last Will and Testament provided for the majority of his estate to be used for the establishment of a boarding school for girls and boys near his birthplace. Today, MSA operates as a coeducational and college preparatory school for grades 8-12 and is home to over 230 girls and boys from Albemarle County, around the Commonwealth of Virginia, the nation, and around the world (over 13 nationalities represented).

In due course of MSA's history, the school has continued to honor the vision of Samuel Miller: to engage the minds, hands, and hearts of the students. The educational curriculum includes land management and sustainable agriculture courses which incorporate the history of the school's rich and biologically diverse landscape to engage students on the 1,000+ acre campus, 637 acres of which have been given as a Deed of Gift of Conservation Easement to the Land Trust of Virginia. This conservation easement also establishes 3 building envelopes, shown in Image 2, below.

Similarly, the Miller School has registered three (3) buildings with the National Register of Historic Places including Old Main (Photograph 2), The Mechanical Arts Building, now known as Caton Hall (Photograph 3), and the President's House (Head of School, not pictured). Preserving the historic resources and landscape is a priority for the School's Board of Trustees, the School's Administration, and the School's community of past and present students. Like any institution, honoring and preserving the historic roots and integrity of the Miller School is paramount to the continued success of the institution. The school's track record suggests that they are committed to continuing this stewardship, which also promotes the objectives of the County's Comprehensive plan.

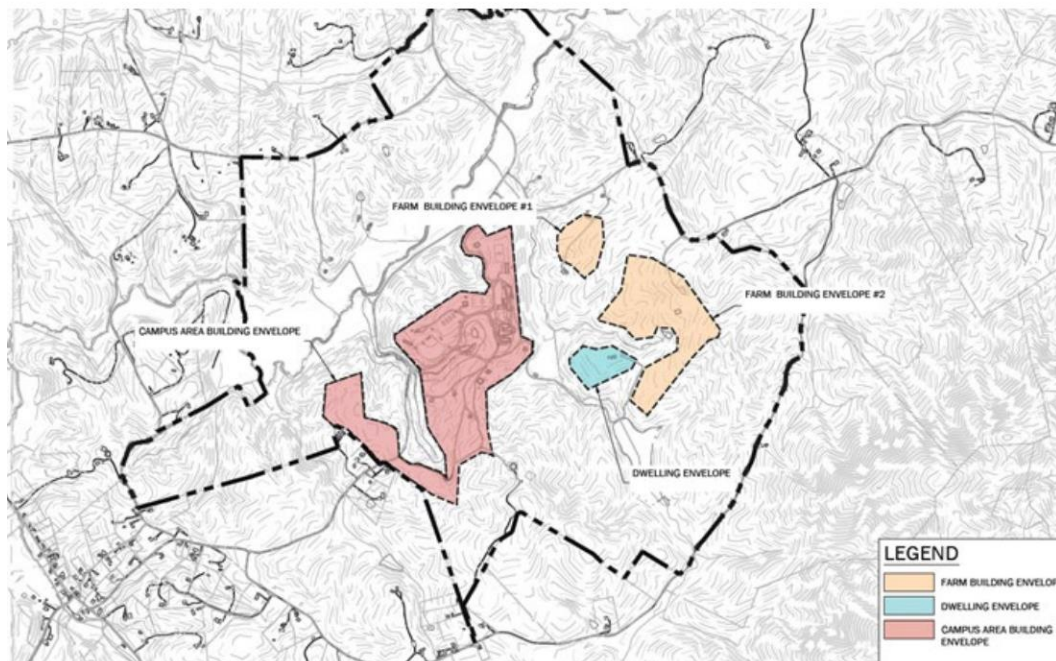


Image 2 - Map indicating the three (3) building envelopes established by the Conservation Easement. The campus academic campus is contained within the "campus area building envelope" highlighted in a pink color. Refer to Appendix B for a larger format copy of this plan.

B. Proposal and Future Uses

As the Executive Summary suggests, the Miller School of Albemarle operates as an independent school under what is referred to as an “existing-and-non-conforming use,” which is to say that the school has never requested to have a use other than what the zoning ordinance identifies for this parcel. The parcel is zoned as a Rural Area (RA) and has a land use designation of residential. However, it is noteworthy to express that the Miller School’s location and operation predate the County’s zoning ordinance.

The Miller School would like to plan for the future of the institution – specifically to sustain moderate enrollment growth and to work toward implementing their Masterplan. The school’s masterplan is a 2-phase plan:

Phase 1) Expand the school’s student population from current enrollment to 300 students and add programming to include K-7th grade students, in supplement to the existing 8-12 grade students. In addition, this phase of the work proposes to renovate and otherwise improve existing facilities for current and near-term enrollment needs as well as add a male dormitory building.

Phase 2) Grow from 300 students toward 500 students, which will require the school campus to grow in order to support the student body, specifically adding several new dormitory buildings and public spaces supporting student life, not to mention adequate parking.

Phase 1: Current Enrollment and Growth to 300 Students

Expand the School’s Programming

The Trustees of The Miller School have determined that they would like to include an additional range of student programming on the campus. At first, this looks like a strategic partnership with Seven Rivers Day School (7R), who will occupy the Haden-Hart building on campus. The current programming plans suggest that 7R will not enroll more than 60 students. However, over time, as this partnership prospers, that number may increase. For the purposes of this SP request, the enrollment of 7R is included within any enrollment numbers requested.

Beyond the limits of the Haden-Hart classroom, much of the curriculum of 7R will take place on the expansive thousand-acre-campus.

Update and Improve Existing Facilities:

It is worth specifically noting that The Miller School does not intend to compromise any of their historic properties, or attributes of these properties. In fact, any future improvements to an historic property will serve to bring the facility into closer alignment with the intention of the property.

In terms of updating and improving the existing facilities, the Miller Schools plans for this work to unfold sequentially; however, the sequence presented herein is subject to change based on enrollment, and/or donors who may desire to fund a specific project.

Identified Campus Improvement Projects

1. Renovate Wayland Hall (Female Dormitory)
2. Strengthen Pedestrian Corridors
3. Clearly Designate Vehicular Corridors and Parking
4. Create an Additional Dormitory for Male Boarding Students
5. Relocate boys from Old Main Basement to New Dorm

Phase 2: Growth from 300 to 500 Students

Expand Campus Programming:

Once the school’s enrolled population has settled around 300 students, the Board of Trustees and the school administration will plan to increase the school’s capacity to host students by increasing classroom spaces and dormitory buildings. These projects will also create outdoor and recreational spaces as well as necessitate additional parking facilities.

The campus will continue to develop along the linear North-South axis in a pattern consistent with the existing campus. Image 3, below, suggests the form and scale this campus growth will take. As will be expounded upon below, all proposed development patterns are consistent and in conformance with the Conservation Easement that the Miller School established which guides development potential on the property.

Intended Campus Improvement Projects

6. Renovate Old Main Basement to Classroom Spaces
7. Create Additional Dormitory Buildings (2, 1 Female and 1 Male)
8. Renovate 4th Floor of Old Main to Classroom Spaces (Currently unoccupied)
9. Improve and Create Outdoor Recreational Spaces
10. Construct New Gymnasium and Additional Parking

Summary of Proposal and Future Uses

Succinctly put, The Miller School of Albemarle would like to request the right to:

- Grow enrollment to 500 students.
- Continue to develop the campus to include up to 3 new dormitory buildings along the north-south linear axis of campus and within the approved campus area building envelope as required by the Conservation Easement.
- Establish outdoor and recreational space within the campus supporting student activities as well as a clearly defined pedestrian corridor within the campus.
- Delineate vehicle corridors and parking independent and segregated from pedestrian areas.

It is the intent of the Miller School that when this master plan is realized, the student population will generally correspond with approximately 200 boarding students and up to 300-day students.

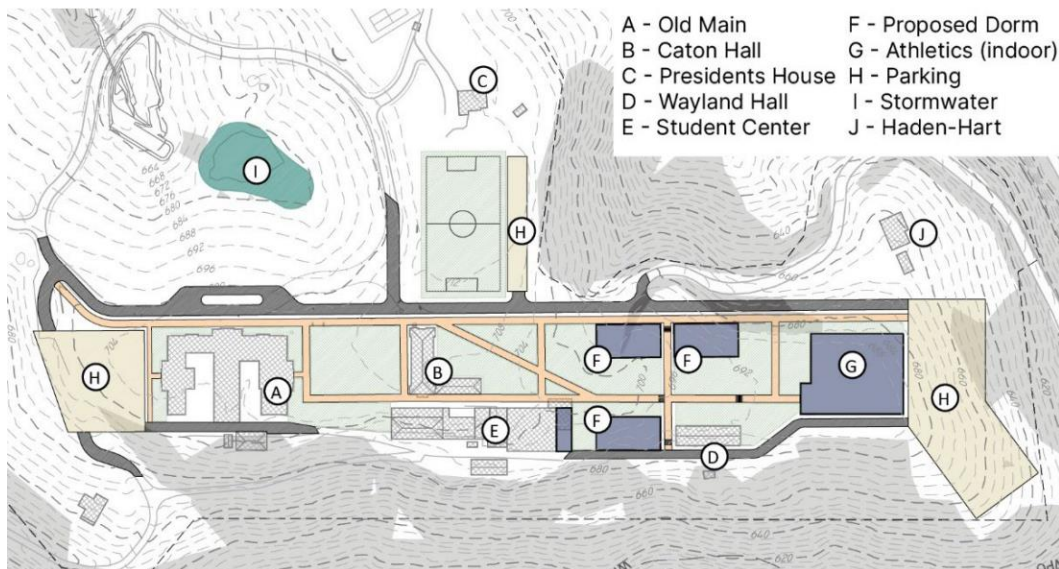


Image 3 – Miller School Campus Masterplan. Refer to Appendix B for larger formal versions of this plan and supplemental illustrative imagery showing the campus growth and development.

Part C: Public Need or Benefit

The Miller School not only meets the specific public need of educating students¹, but it also provides several specific public benefits, including preservation of historic resources, conservation of natural resources as well as sharing these resources with the community – specifically those partaking in the recreational amenities the school has established. As requested in the SP checklist the Miller School meets public needs and benefits in many ways; a sampling of these is included here:

PUBLIC NEED

We educate the minds, hands, and hearts of 230 students each year (150 of whom are from Albemarle County and surrounding towns) in accordance with our Mission and Values.

Supporting numerous athletic sports and activities, we host competitions and sporting events on our campus attended by many hundreds of visiting student athletes and their families each year.

We are proud to be a small school where dynamic interactions between our teachers and students flourish into strong mentor-mentee relationships.

Our minds, hands and hearts model promote key moral codes that foster well-being, inclusion and values operating a sustainable campus and living models.

We offer a challenging and structured curriculum through which students not only learn but love to learn.

We inspire students through experiences, where what they study comes to life and what they know can impact the world around them.

With vibrant diversity, we come together in genuine fellowship. Our culture of respect inspires and empowers our students to become intelligent, brave, and just citizens.

We encourage our students to shine as concerned leaders and devoted team players through civic-minded programs built on cornerstones of Honor and Service.

We require all students to take and pass a Civics course for graduation.

We have a robust Student Community Service Program that over the past decade has been distinguished by partnerships with local non-profit organizations including: the Jefferson School African-American Heritage Center, the Virginia Foundation for the Humanities, the Festival of the Book, Live Arts, City of Promise, the Thomas Jefferson Foundation at Monticello, the Center for the Book, Horses as Healers, Martha Jefferson House, local elementary schools and the Albemarle Housing Improvement Program.

We perform morally, ethically, and consciously, and our students' education is heightened by an awareness and appreciation of the environment and our natural resources. Our students are taught to be participants in their futures and to take action in the direction of their journeys as lifelong learners.

PUBLIC BENEFIT

The property has approximately 510 acres of forest cover. The forest cover on the property acts as a forested riparian buffer to help protect water quality for on-site drainage features and wetlands, provides cover for wildlife, contributes to the property's scenic values and is a resource for forestry uses.

Miller Branch, which is a USGS perennial stream, flows through the property for 1.25 miles. There are also two instances of National Wetlands Inventory (NWI) wetlands that will be protected by the conservation easement that are classified as Freshwater Ponds.

Protection of the open space and agricultural resources afforded by the conservation easement over this property will maintain this land for its current use as well as many others.

The school has registered three (3) buildings on the National Register of Historic Places. By voluntarily registering these buildings the Miller School has established a precedent that the value of the property is greater than just classrooms and hallways. The maintenance and upkeep of historic buildings is greater

¹ During the Covid pandemic the school's enrollment went up – suggesting that private institutions like the Miller School were able to meet and sustain a specific public benefit during a time of national crisis.

than contemporary or modern buildings; yet the Miller School is attentive to preserve and maintain the integrity of their historic resources.

PART 2: CONSISTENCY WITH THE COMPREHENSIVE PLAN

The Miller School of Albemarle (MSA) has been educating students on this campus since it was founded in 1878 with a bequest from Samuel Miller, who was raised in Batesville, Virginia and later became a successful businessman. His Last Will and Testament provided for the majority of his estate to be used for the establishment of a boarding school for girls and boys near his birthplace. Today, MSA operates as a coeducational and college preparatory school for grades 8-12 and is home to over 230 girls and boys from Albemarle County, around the Commonwealth of Virginia, the nation, and around the world (over 13 nationalities represented).

A. Land Use

The Miller School of Albemarle is located in a Rural Area as defined by the County's Comp Plan. The Rural Areas of Albemarle County are of strategic importance to the County because these areas contain the majority of the County's natural, historic, scenic, and cultural resources. In light of these important values, the Miller School provides an exemplary precedent for how to honor and care for these resources. It is important to note that while the Miller School contributes to each of these areas, in a unified holistic manner, the Comprehensive Plan does not necessarily distinguish between these categories as being of higher or lesser importance. Which is to say that protecting these attributes of Rural Areas is holistically important.

Natural Resources:

I. AGRICULTURAL: SOILS + OPEN SPACE

The property has approximately 435 acres which have been delineated as Prime Farmland based on the Virginia Land Conservation Foundations (VLCF) Conservation Value Review Criteria². The VLCF has identified the protection of agricultural farmland as a matter of statewide importance. The soils on the property are well-suited for a variety of agricultural uses.

For this reason, these natural assets have been included within the Miller School's Conservation easement. Protection of the property's significant agricultural resources (soils and open space) afforded by the conservation easement will maintain and protect this land in perpetuity.

This specifically supports Objective 1 of the Comp Plan with regard to Rural Areas.

II. FORESTAL

The property has approximately 510 acres of forest cover. Most of the forest cover is eastern hardwood forest. This forested land provides significant conservation values, as it acts as a forested riparian buffer to help protect water quality for on-site drainage features and wetlands, provides cover for wildlife, contributes to the property's scenic values, and is a resource for forestry uses – specifically didactic learning for the students.

This specifically supports Objective 1 + 2 of the Comp Plan with regard to Rural Areas.

III. WATER RESOURCES

The property includes 1.25 miles of Miller Branch, which is a USGS perennial stream. The property has three instances of National Wetlands Inventory (NWI) wetlands that will be protected by the conservation easement. Two areas are classified as Freshwater Pond, one of which is 0.43 acres, and the other is 11.61 acres (also known as the "Lake"). The third area is 1.22 acres classified as Freshwater Forested/Shrub Wetland, and is located adjacent (to the southeast) of the Lake. The property is in the Mechums, Rivanna, and James River watersheds, all of which are state-designated scenic rivers. The property is also in the Chesapeake Bay watershed.

This specifically supports Objective 2 of the Comp Plan with regard to Rural Areas.

² Section A(1)(a)(1) of the VLCF's Conservation Value Review Criteria

IV. HISTORIC RESOURCES

Historic Resources are covered explicitly in Part 2B, below.

V. SCENIC RESOURCES:

Scenic Open Space is one of the property's most significant conservation values. The property has approximately 5,110 feet of road frontage and scenic open space on the west side of State Route 689 (Pounding Creek Road). The property has approximately 4,130 feet of road frontage and scenic open space on the south side of State Route 637 (Dick Woods Road). The property has approximately 2,755 feet of road frontage and scenic open space on the east side of State Route 635 (Miller School Road). The property also has approximately 2,820 feet of road frontage and scenic open space on both sides of State Route 635 (Miller School Road) as it runs through the property. All of this road frontage totals approximately 2.8 miles. These scenic open space values are documented with the ground photography in Appendix F of this application.

Preservation of the property's open space (via the conservation easement) will yield significant and substantial public benefit and supports not just local, but also Federal and State governmental conservation policies and for the scenic enjoyment of the general public.

This specifically supports Objective 4 of the Comp Plan with regard to Rural Areas.

VI. CULTURAL RESOURCES:

The cultural resource that the Miller School is to the local community is indisputable by virtue of the detailed information provided herein with respect to Agricultural, Forestal, Water, Historic and Scenic resources. The School Community and Board of Trustees are well informed and understand the positive impact the institution has based on their stewardship of the land, retaining agricultural and forestal activities, protecting natural resources and maintaining unfragmented land to protect biodiversity.

This specifically supports Objective 3 of the Comp Plan with regard to Rural Areas.

B. Historic Resources

Albemarle County has limited measures and incentives by which to encourage landowners to preserve resources on their property. At this time, preservation efforts are entirely voluntary. Despite having a specific requirement for properties containing historic resources to follow – the Miller School has voluntarily and proactively worked to preserve and protect significant resources on the property.

There are forty-three (43) buildings on the property, totaling nearly 104,000 SF of existing structural footprint. There are thirteen residences (13), one (1) dorm, three (3) educational buildings, one (1) barn, twelve (12) sheds/storage buildings, seven (7) buildings associated with the baseball field, and six (6) other miscellaneous buildings. With the exception of the buildings associated with the baseball field, it is possible that all the other structures are over 50 years old. These structures are identified in Plan C1.3 in Appendix B.

BUILDINGS VOLUNTARILY REGISTERED AS HISTORIC PLACES

The Miller School has proactively registered three (3) buildings with the National Register of Historic Places, Old Main (Photograph 2), The Mechanical Arts Building (Photograph 3), and President's House (Head of School). These registrations were done entirely voluntarily, because protecting these resources is important to the Miller School. The other buildings on the property are likewise important to the school despite not being on the National Register.

PROPOSED ADDITIONS TO HISTORIC STRUCTURES

The Miller School of Albemarle does not propose to make additions to any of the historic buildings on the property. Furthermore, as the County's Comp Plan specifically states: "Rehabilitation, restoration and maintenance of historic structures can be costly." Making additions to historic structures, while not specifically mentioned in the list, is likewise costly. As such, the Board of Trustees of the Miller

School, at its sole discretion, will make the determination if working on existing buildings (restoring, adding on or maintaining) is financially responsible and feasible. It is for this reason that the Comprehensive Plan acknowledges that these activities are voluntary. The school is aware of the financial incentives which may be available on a case-by-case basis and will consider these incentives in due course.

NEW BUILDINGS:

As this SP application indicates, the Miller School plans to add several new buildings to the inventory of the campus, specifically, new dormitories. However, none of these buildings have been formally designed or developed beyond the conceptual layout shown herein.

Based on the concepts included herein the building size and orientation will be harmonious with the linear arrangement of the campus. This is to suggest that development of new buildings will happen along the north-south linear axis of the campus – which promotes a rhythmic cadence to the precincts that support academic, social, athletic, recreational, and individual life within the campus. New buildings will be constructed of materials that are compatible with but different than the existing buildings and the proposed buildings.

PART 3: IMPACTS ON PUBLIC FACILITIES, INFRASTRUCTURE AND ENVIRONMENTAL FEATURES

A. Environmental Features

Given the robust conservation easement that the Miller School established and the limited development envelope allowed as a result of that easement, the proposed site improvements associated with the school programming will be contained within the Campus Area Building Envelope as defined in Image 2.

This area is an upland location on the site and has already been “developed” in terms of site disturbance. Any proposed micro-site grading will be de minimis in terms of disturbance and impact. This development strategy has no known adverse impacts on environmental features beyond those which are understood to accompany development. Each future project will satisfy the requirements of stormwater management and protection of downstream waterways.

B. Public Resources

The Miller School is proposing a moderate increase in enrollment over the next decade. That said, the presence of the school and the operations of the school could have perceived or measurable impacts on public resources, though it is fair to say that the Miller School is in and of itself a public resource. The school hosts numerous events open to the public and allows the public to enjoy the natural resources conserved and maintained by the school.

PUBLIC TRANSPORTATION FACILITIES

Refer to Part 4B, below, for detailed information related to impacts on Public Transportation Facilities.

PUBLIC SAFETY FACILITIES

There are no public safety facilities in the near vicinity of the school. It is not anticipated that this school will have an adverse impact on any public safety facilities.

PUBLIC SCHOOL FACILITIES

The Miller School is approximately 3 miles away from Western Albemarle High School, Henley Middle School and Brownsville Elementary School, the nearest public-school facilities that educates students of the same age as the Miller School proposes.

PUBLIC PARKS

The Miller School is located approximately 4 miles from Crozet Park, 5.5 miles from Mint Springs Park and 5.25 miles from Beaver Creek Reservoir Park. There is no known nor projected adverse impact the school has on these facilities.

PART 4: TECHNICAL DOCUMENTATION

A. Student Enrollment Figures

2023-2025	Growth to 300 Students Maximum 100 Boarding Students
2025 -	Growth to 500 Students Maximum 200 Boarding Students

B. Traffic Data and ITE Trip Generation Figures

VDOT TRAFFIC DATA (2021, LATEST AVAILABLE)

Average Annual Daily Traffic (AADT) = 1700 vpd
Peak Hour Factor (K) = 0.1517
Directional Factor (D) = 0.5667
Peak hour weekday traffic = 258 vph (146 south/112 north)

2019 and 2020 AADT values are 1300 and 1100 vehicles per day, respectively. These fluctuations in historic values reflect the influence of the school's enrollment on Miller School Road traffic during the COVID pandemic.

PROJECTED TRAFFIC DATA WITH ENROLLMENT INCREASE

Average Annual Daily Traffic (AADT) = 1948 vpd
Peak hour weekday traffic = 337 vph (191 south/146 north)

ITE TRIP GENERATION DATA

2023-2025	Growth to 300 Students Maximum 100 Boarding Students Average 200 Day Students Weekday AM Peak Hour (7-9 am) Average Rate: 158 Total, 100 Entry, 58 Exit Direction Distribution: 63% Entering, 37% Exiting Weekday PM Peak Hour (4-6 pm) Average Rate: 34 Total, 15 Entry, 19 Exit Direction Distribution: 43% Entering, 57% Exiting Weekday Total Average Rate: 496 Total, 248 Entry, 248 Exit Direction Distribution: 50% Entering, 50% Exiting
2025 +	Growth to 500 Students Maximum 200 Boarding Students Average 300 Day Students Weekday AM Peak Hour (7-9 am) Average Rate: 237 Total, 149 Entry, 88 Exit Direction Distribution: 63% Entering, 37% Exiting

Weekday PM Peak Hour (4-6 pm)
Average Rate: 51 Total, 22 Entry, 29 Exit
Direction Distribution: 43% Entering, 57% Exiting

Weekday Total
Average Rate: 744 Total, 372 Entry, 372 Exit
Direction Distribution: 50% Entering, 50% Exiting

The above is based on ITE code 532: Private School K-12, which contains a limited number of studies. At the time of site plan development, a specific study will need to develop values for parking requirements that conform to the Miller School's operations.

C. Entrance Analysis

There are four (4) existing entrances to the property along Miller School Road. The primary entrance was improved in 2012 with SDP201200032 and receives all student drop-off traffic (see Appendix C for sight triangles). Therefore, only a turn lane warrant analysis of this entrance was performed. Neither left nor right turn lane warrants were met, therefore this SP does not propose any additional improvements to the entrance. Refer to Appendix C for technical documentation of these findings.

ASSUMPTIONS

- The surrounding zoning and the physical location of Mechums River make future traffic-generating development highly unlikely along this portion of Miller School Road.
- The posted speed along this portion of Miller School Road is 25 MPH, however a conservative design speed of 40 MPH has been used.
- The proposed ITE AM peak hour volumes have been used for analysis.
- The peak hour of the school drop-off occurs concurrently with the peak hour of Miller School Road.
- Since neither warrant was met at the main entrance, turn lanes at the other entrances are also not warranted.

LEFT TURN LANE WARRANT ANALYSIS

The percentage of left turns into the site is not known. For the purposes of this warrant, it has been conservatively assumed that all entering vehicles make left turns (149 vph). Advancing and opposing volumes have been projected to be 191 and 146 vph, respectively, resulting in a left turn percentage of 78%. A VDOT nomograph for this condition does not exist, so the closest percentage available was selected (40%, see Appendix C for nomograph). **This results in no turn lane required.**

Other factors were also considered during the analysis, such as crash statistics. There have been 3 accidents in the vicinity of this entrance, however they are unrelated to its functionality (all were single-vehicle crashes occurring at night and involving either alcohol or animals). Therefore, there is no evidence that the current configuration experiences a breakdown in functionality or safety. Installing a left turn lane at this entrance would be costly, require substantial environmental impact, and would not result in a significant safety or functionality benefit to the public.

RIGHT TURN LANE WARRANT ANALYSIS

The 2012 improvements to the primary entrance provided a tapered treatment. Assuming the future volumes listed above, this treatment can support approximately 90 turns per hour (see VDOT RDM Appx F, Fig. 3-26). This is 60% of the projected peak volume into the site. Since far less than 60% of the peak trips to the site will make right turns, this entrance is sufficient to support the proposed enrollment.

SPECIAL EVENTS

Special events such as games and performances may generate turning volumes higher than those estimated here. However, these would likely not occur during the peak hour. These events may be mitigated by several acceptable strategies common to schools, including: the temporary directing of traffic during peak hours, reorganizing internal traffic flow to utilize multiple entrances, and adjusting program schedules to offset peak traffic flows from various events.

D. Water and Sewer Demand

The Miller School of Albemarle is served by well and septic systems. The school maintains current and accurate records for these systems. The growth of the campus as shown herein will require a Central Sewer Permit. This application will be submitted separately from this SP document. We will work directly with County Engineering staff for this permit.

LIST OF APPENDICES

Appendix A: SP Application and Checklists
Appendix B: Mapping and Concept Plans
Appendix C: Supplementary Technical Documents
Appendix D: Plat(s)
Appendix E: National Register of Historic Places
Appendix F: Scenic Resources Documentation