List of Organizations & Stakeholders that Submitted Public Comments

(February 15, 2019 – April 16, 2019)

Neuse Wastewater Interests

Neuse River Compliance Association* NC Water Quality Association Upper Neuse River Basin Association New Bern Wilson Apex Clayton Contentnea Johnston County Goldsboro Grifols EPA Water Quality Trading Memo

Agriculture Interests

NC Division of Soil & Water Conservation NC Farm Bureau Wayne County Soil & Water Wake County Soil & Water Orange County Hyde County Soil & Water Franklin County Local Advisory Committee

Nutrient Offset Interests

NC Divisions of Mitigation Services NC Stewardship Program Restoration Systems Water & Land Solutions

Private Citizens Mike Herrmann Steve Tedder

Notes:

The Neuse River Compliance Association has 21 members (see list next page) The Tar-Pamlico Basin Association has 15 members (see list on next page)

Tar-Pamlico Wastewater Interests

Tar-Pam Basin Association* Greenville Utilities Pinetops Tarboro Robersonville Oxford Louisburg Rocky Mount Franklin County

Stormwater Local Governments

Granville County Vance County City of Durham City of Raleigh City of Wilson

Non-Government Organizations

Sound Rivers American Rivers NC Conservation Network Haw River Assembly Water Keepers Alliance

Public Hearing Comments & Notes

Kinston, NC – March 26, 2019 Clayton, NC – March 28, 2019

List of Neuse & Tar-Pamlico Wastewater Association Members

Neuse River Compliance Association Membership (21 Members)

- Town of Apex Town of Benson Town of Cary Town of Clayton Contentnea Metro Sewerage District Town of Farmville Dupont-Kinston City of Goldsboro City of Havelock County of Johnston Town of Kenly
- Town of Lagrange City of New Bern Progress Energy Carolinas City of Raleigh City of Wilson City of Kinston Aqua, North Carolina South Granville Sewer and Water Authority Marine Corp Air Station – Cherry Point Craven County

Tar-Pamlico Basin Association Membership (15 Members)

Town of Belhaven Town of Bunn Town of Enfield Franklin County Greenville Utilities Commission Town of Louisburg City of Oxford Town of Pinetops Town of Robersonville City of Rocky Mount Town of Scotland Neck Town of Spring Hope Town of Tarboro Town of Warrenton City of Washington

Neuse River Compliance Association® P.O. Box 1410

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Clayton, N.C. 27528 - 1410

April 15, 2019

Mr. John Huisman NCDEQ, DWR, Water Planning Section 1611 Mail Service Center Raleigh, N.C. 27699 - 1611

Dear John:

On behalf of the Neuse River Compliance Association ("NRCA") we respectfully submit the attached comments on the Proposed Nutrient Rules currently circulated for public comment.

The NRCA members are comprised of local governments and other major owners of wastewater treatment facilities (see attached member list) in the Neuse River Basin. Our members have continued to improve water quality in the Neuse River and its estuary by reducing their nitrogen discharge as a group well over 70% since 1995.

Thank you for the opportunity to submit our comments. If you require any additional information please let us know.

Sincerely,

Haywood M. Phthisic, III, Executive Director

Enclosure cc: LNBA/NRCA Board

Neuse River Compliance Association Membership

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Town of Apex, N.C.

Town of Benson, N.C.

Town of Cary, N.C.

Town of Clayton, N.C.

Contentnea Metropolitan Sewer District, Grifton, N.C.

Town of Farmville, N.C.

Dupont-Kinston, Kinston, N.C.

City of Goldsboro, N.C.

Town of Havelock, N.C.

Johnston County, N.C.

Craven County, N.C.

Town of Kenly, N.C.

Town of LaGrange, N.C.

City of New Bern, N.C.

Duke Energy - Progress

City of Raleigh, N.C.

City of Wilson, N.C.

City of Kinston, N.C.

Aqua, North Carolina

South Granville Water and Sewer Authority, Butner, N.C.

Marine Corp Air Station - Cherry Point, Havelock, N.C. (non-voting member) Utilities, Inc., Charlotte, N.C. The Neuse River Compliance Association is most appreciative of the close examination of its prior comments by the EMC members in the determination of how the proposed rules were sent to notice. The changes in the Neuse Estuary sources of nitrogen loading have been significant in the past 20 years. The members of the NRCA have invested heavily in reducing their loading of TN – more than \$400 million in plant upgrades. In addition, the NRCA members continue to improve their collection systems to reduce SSOs as a source of TN loading.

ADAPTIVE MANAGEMENT STRATEGY. Unfortunately, the TN loading of the Estuary does not appear to have made any significant progress from its conditions in the late 1990s when the TMDL was prepared. The point sources are reaching the point that future service needs in the basin are in jeopardy due to the other sources of loading. Accordingly, the NRCA supports the addition to the Purpose and Scope rule for the Neuse Estuary as shown at 15A NCAC 2B .0232 .0710 of an Adaptive Management strategy. There is a clear need to identify additional TN loading sources for mandatory reductions so that point sources can continue to provide needed public service while performing at the remarkable levels of TN reduction now being achieved. It may also be appropriate to address the difference in loading between organic and inorganic sources of nitrogen in this iteration of the TMDL strategy. The new load is shown to be coming from organic nitrogen and that provides no basis for an additional reduction requirement for the NRCA members.

SET INDIVIDUAL TN LIMITS FOR POINT SOURCES WITH PERMITTED FLOWS LESS THAN 0.5 MGD. The NRCA supports many of the changes made to 15A NACA 2B .0234 .0713 in the proposed rules. The NRCA remains unable to understand the decision by DEQ to ignore the plain language in (5)(v) of the rules. Unlike the other point sources listed in (5)(ii)-(iv), the point sources with permitted flows less than 0.5 MGD are not assigned an individual discharge allocation in their NPDES permits. Those sources exceed their collective annual discharge allocation of 138,000 pounds and have become an important source of TN loading as well as creating a substantial inequity for the customers of the NRCA which are paying to reduce their TN loading. The NRCA urges the Hearing Officers to address that inequity by rule amendment as DEQ is unwilling to enforce the current rule.

CREDIT FOR FORESTED BUFFER RESTORATION. The NRCA supports Option 2 in 15A NCAC 2B .0240.0703(d)(3). Restored forest riparian buffers are identified as one of the most cost effective and enduring forms of nutrient control and removal from loading. In the Fiscal Note, the practice is the example given of the form of SCM which does not need to be replaced if damaged once mature. The EMC should incentivize this important recovery technique for the nutrient impaired waters of the State.

CLARIFY THAT NPDES FACILITIES DO NOT NEEDS TO ESTABLISH A NUTRIENT BANK TO BUILD CREDITS FOR USE BY THE FACILITY. The NRCA is concerned that the proposed rules create an obstacle which will make it impossible for any of its members, other than the City of Raleigh, to be able to use the nutrient credit opportunity provided in 15A NCAC 2B .0240 .0703(I). By that addition to the Nutrient Offset Credit Trading rule, WWTPs are supposed to be able to generate their own nutrient credits for use in expanding existing plants or adding new plants. This problem arises from two sources; (1) N.C. Gen. Stat. 143-214.26 is the sole statute setting forth authority of the EMC to regulate nutrient offset projects for the purpose of generating nutrient offset credits and (2) the proposed rule, as explained in the current fiscal note will require the WWTPs to establish a nutrient bank. The pertinent text from the Fiscal Note includes the following:

5.4.12 REVISIONS IN PARAGRAPH (L), NPDES WASTEWATER PERMITTEE-RESPONSIBLE NUTRIENT OFFSET PROJECTS

Paragraph (I) clarifies that NPDES wastewater permittees can establish nutrient offset banks to address nutrient permit requirements. This vertically-integrated approach to nutrient trading is consistent with nutrient trading models nationally. Further, it potentially provides opportunities for municipal NPDES wastewater permittees to generate nonpoint source credits using methods that are not traditionally utilized by private providers, such as installation of nutrient reduction practices on public land or in urban areas. . . .

Actually, paragraph (I) contrasts with paragraph (k) by the fact that the operative sentence imposing the establishment of an offset bank is omitted.

(k) DEVELOPER-RESPONSIBLE NUTRIENT OFFSET PROJECTS. A developer subject to new development stormwater requirements of this Subchapter may satisfy its nutrient reduction obligations by generating its own offsite credits. It may do so by establishing a nutrient offset bank and generating credits in accordance with this rule. Alternatively, the developer shall comply with all provisions of this rule governing the generation of nutrient offset credits by a provider with the following modifications:

- (1) Instead of a credit release schedule, credit for the project may be assigned upon construction of the project and submission of the as-built report as described in the project plan:
- (2) Credit shall be assigned at a 50 percent rate based on the design specifications of the fully completed project(s); and
- (3) Liability for the generation of credits as described in the project plan remains with the developer until the completion of all milestones associated with the project.

(I) NPDES WASTEWATER PERMITTEE-RESPONSIBLE NUTRIENT OFFSET PROJECTS. A locality, authority, utility, or sanitation district operating a permitted wastewater facility subject to wastewater rules of this Subchapter may generate nutrient offset credits by installing projects in accordance with this rule. Any credits generated may then be utilized for compliance purposes as if acquired from another provider.

While (I) of the rule is silent on the question, it uses the phrase "installing projects in accordance with this rule." Especially in light of the Fiscal Note, the rule can be read to require that the NPDES permittees must comply with all the provisions as set out in (e). Those requirements include the establishment of a nutrient credit bank.

The General Statutes are not clear as to whether a local government can use credits that it generates if the credits are placed in a nutrient credit bank. In addition, the better reading of the statutes is that a local government cannot establish a nutrient credit bank unless the local government had established a mitigation bank, as provided in N.C. Gen. Stat. §143-214.11, prior to July 1, 2011. Raleigh is the only local government in the Neuse Basin which meets that

criterion. See N.C. Gen. Stat. §§143-214.11(a)(2)¹ and 143-214.26²(b) and (c). To avoid this set of issues, the proposed rules should be amended to make clear that NPDES facilities do not have to establish a nutrient bank to use credits the NPDES facilities create. Corresponding changes should also be made in the Fiscal Note.

The Fiscal Note does not explain why the EMC considers it necessary for a NPDES wastewater permittee which is using the nutrient credits for its own compliance needs to establish a nutrient bank. The purpose of the provision is to make it easier for compliance when the nutrient credits will be owned and used by the permit holder. To achieve that end, the following revisions are recommended for the proposed paragraph (I). The proposed changes are shown with highlight and red font.

(I) NPDES WASTEWATER PERMITTEE-RESPONSIBLE NUTRIENT OFFSET PROJECTS. A locality, authority, utility, or sanitation district operating a permitted wastewater facility subject to wastewater rules of this Subchapter may generate nutrient offset credits by installing projects in accordance with (e)(2) and (4) of this rule. Any credits generated may then be utilized for compliance purposes by the permitted wastewater facility as if acquired from another provider. Before a permitted waste water facility can be eligible to sell nutrient credits, the permitted wastewater facility must comply with (e)(1) and (3) of this Rule.

² § 143-214.26. Nutrient offset credits.

- (1) Consistent with rules adopted by the Commission for implementation of nutrient management strategies.
- (2) Located within the same hydrologic area, as defined in G.S. 143-214.11, in which the associated nutrient loading takes place.
- (b) A government entity, as defined in G.S. 143-214.11, may purchase nutrient offset credits through either:
 - (1) Participation in a nutrient offset bank that has been approved by the Department if the Department approves the use of the bank for the required nutrient offsets.
 - (2) Payment of a nutrient offset fee established by the Department into the Riparian Buffer Restoration Fund established in G.S. 143-214.21.

(c) A party other than a government entity, as defined in G.S. 143-214.11, may purchase nutrient offset credits through either:

- (1) Participation in a nutrient offset bank that has been approved by the Department if the Department approves the use of the bank for the required nutrient offsets.
- (2) Payment of a nutrient offset fee established by the Department into the Riparian Buffer Restoration Fund established in G.S. 143-214.21. This option is only available to an applicant who demonstrates that the option under subdivision (1) of this subsection is not available. (2009-337, s. 4(a)-(c).)

¹N.C. Gen. Stat. §143-214.11(a) (2) Government entity. - The State and its agencies and subdivisions, or the federal government. "Government entity" does not include a unit of local government unless the unit of local government was a party to a mitigation banking instrument executed on or before July 1, 2011, notwithstanding subsequent amendments to such instrument executed after July 1, 2011.

⁽a) Nutrient offset credits may be purchased to partially offset nutrient loadings to surface waters as required by the Environmental Management Commission. Nutrient offset projects authorized under this section shall be all of the following:

ALLOW USE OF BEST AVAILABLE INFORMATION TO ESTABLISH BASELINE. The NRCA requests that the EMC allow for documentation of the site conditions with the best available information to show the baseline conditions. In 15A NCAC 2B .0240.0703(e)(2)(D), an applicant for a nutrient credit project is required to provide "Documentation of the condition of the site during the baseline period of the applicable nutrient strategy." The ability to establish the site conditions for the Neuse Estuary in the early 1990s is very limited. To the extent that records existed, they are being regularly retired or destroyed. The rule should be amended to allow the use of best professional judgment based on the available information.

RESTORE NUTRIENT CREDIT PROJECTS UNLESS DOCUMENTED REDUCTIONS ARE BEING ACHIEVED. Nutrient credits are the only feasible way for upper basin Neuse Estuary WWTPs to address the additional growth now occurring in the basin. The Town of Clayton and Johnston County have immediate needs to grow beyond their nutrient allocation permit limits. Johnston County has relied on land application to meet its needs for a number of years. Raleigh has similar problems which will become more acute in another 15 years when the current allocation is expected to be exhausted. The cost of nutrient credits is significant and should be expected to become greater with increased demand. The WWTPs will be responsible for demonstrating that they have sufficient credits to support their TN loading.

In proposed 15A NCAC 2B .0240 .0703 (g)(5), a SCM can be replaced by natural ecological processes under certain circumstances. Neither the rule nor the Fiscal Note addresses how the nutrient credit values will be established for compliance purposes when that change occurs and is allowed to stay in place instead of being replaced by a SCM.

This is the language from the Fiscal Note on this issue. It addresses a narrow set of SCMs but allows all SCMs to avoid replacement.

The final provision of this paragraph addresses the potential impacts of natural disasters, most likely hurricanes or fire. Presently, most nutrient offset projects use the agricultural buffer restoration practice, which is designed to restore a natural ecological community. The project duration is 5-7 years, during which the most critical phase of restoration occurs. If the site is impacted during that project period, providers will be required to restore the site. Beyond that period, the foliage at the site is expected to become more resilient as the plantings mature. Because large scale disturbance events are part of the natural ecological condition, and because ecological succession can be relied upon to restore the site without the need for dedicated new plantings, the Division will not require further restoration by the landowner or steward after project completion. Inclusion of this provision reduces risk for the landowner and long-term steward and therefore reduces the amount for funding necessary for a non- wasting endowment by the provider. To date, this has been a largely theoretical issue and no formal policy is in place to address it. Therefore, it establishes the benchmark in these situations and results in neither a cost nor a benefit.

REVISE THE FISCAL NOTE TO ADD THE EPA TRADING POLICY ISSUED FEB. 6, 2019. The Fiscal Note give considerable attention to the EPA Trading framework. After the Fiscal Note was approved, EPA issued a new memorandum on its nutrient trading policy. The Fiscal Note should be amended to incorporate and address the new memorandum.

REVISE THE FISCAL NOTE TO REMOVE THE INFORMATION USED TO UNDERMINE THE PROPOSED RULE AT 15A NACA 2B .0713. The Fiscal Note went to great lengths to undermine the EMC's proposed rule change for the nutrient credit ratio to be applied when new or expanding WWTPs rely on nutrient credits. That information should be deleted.

REVISE THE FISCAL NOTE TO REMOVE THE INFORMATION ASSERTING THAT ADEQUATE CAPACITY EXISTS IN THE BASIN FROM THE EXISTING NUTRIENT ALLOCATIONS.

The Fiscal Note asserts that adequate capacity exists in the basin from nutrient allocations to support the growth needs of the upper basin jurisdictions. Despite a showing by NRCA members that there is no capacity available for sale or lease to support these needs, the EMC approved the Fiscal Note. This inaccurate information should be removed or, at a minimum amended to show that multiple jurisdictions have been unsuccessful in finding capacity to meet their needs for the expansion or addition of NPDES facilities.



NORTH CAROLINA WATER QUALITY ASSOCIATION

NORTH CAROLINA WATER QUALITY ASSOCIATION

protecting Wate

April 16, 2019

Via Email (nps-comments@ncdenr.gov)

John Huisman Division of Water Resources, Nonpoint Sources Planning Branch 1611 Mail Service Center Raleigh, NC 27699

Re: Proposed Amendments to the Neuse & Tar-Pamlico Nutrient Strategy Rules

Dear Mr. Huisman:

On behalf of the North Carolina Water Quality Association (NCWQA), please find attached our comments on the proposed amendments to the Neuse & Tar-Pamlico Nutrient Strategy Rules. We appreciate the Department's consideration of our comments.

Please call if you have any questions or require additional infomation.

Sincerely,

E. Paul Colerita

F. Paul Calamita General Counsel

C: NCWQA Board

COMMENT OF THE NORTH CAROLINA WATER QUALITY ASSOCIATION REGARDING THE PROPOSED AMENDMENTS TO THE NEUSE & TAR-PAMLICO NUTRIENT STRATEGY RULES

NCWQA is a statewide association of public water/sewer/stormwater utilities representing a significant majority of the sewered population of North Carolina. NCWQA strives to achieve environmentally responsible solutions to water and sewer issues in an affordable and cost-effective manner.

NCWQA appreciates the opportunity to provide this comment on the proposed draft.

The Department has indicated that the purpose of the proposed revisions to the Neuse and Tar-Pamlico nutrient strategies is "to equitably reduce nutrient loading from various sectors to eliminate excess algal production and resulting algal-related impairments in two of North Carolina's most environmentally and economically important estuaries." *See* OSBM Approved Fiscal Note at 6 (*available at* https://files.nc.gov/ncdeq/documents/files/OSBM%20Approved%20Fiscal%20Note%2012-12-2018.pdf). To that end, NCWQA would like to applaud DEQ for implementing a nutrient trading program. Although NCWQA is pleased with the overall structure of the proposed changes, we have specific comments, questions, and proposed changes to several of the individual sections.

At the outset, NCWQA wishes to point out that in February of 2019, EPA's Assistant Administrator for Water, David Ross, issued a new Policy Memo on Water Quality Trading ("Ross Memo"), which is available at https://www.epa.gov/sites/production/files/2019-02/documents/trading-policy-memo-2019.pdf. Although the comments in the Fiscal Note accompanying the proposed changes cite to the 2003 EPA Water Quality Trading Policy as justification for some of the proposed changes, this policy guidance was replaced by the 2019 Ross Memo. In some places, the Ross Memo reinforces changes proposed by DEQ, including:

- "Demanding too much precision in measuring or predicting pollutant reductions from certain types of discharges, e.g., point source stormwater and nonpoint source runoff...." (In an interview, Ross acknowledged that in the past, "the agency would require precision—almost molecule for molecule—in offsets.").
- Failing to consider third-party credit verification, aggregation, or audit service providers.
- Failing to allow banking and future use of water quality credits, which encourages early adoption of pollutant reduction practices, reduces risks associated with practice failures, and likely broaden and strengthen the marketplace for buyers and sellers.
- Overly rigid and complicated baseline policies and expensive baseline requirements, which are often a barrier to entry in market-based programs.
- Complicated baseline calculations, which can create regulatory and market uncertainty.
- Limiting projects to only one type of credit, because projects that generate multiple types of credit may promote more holistic resource improvements and may create additional financial incentives and promote portfolio diversification.
- Failing to consider innovative financing mechanisms (e.g., environmental and community bonds, Section 319 grants, SRF loans, and WIFIA funds), which can promote integrated point and nonpoint pollution strategies.

Thus, it may be advantageous to update the the comments to reflect the current EPA guidance.

NCWQA Comments April 16, 2019 Page 2

Regarding Rule .0701, the proposed rule contains definitions for the chapter that refer to the definitions made in Rule .0202. We object to Rule .0701, which refers to Rule .0202 for the definition of "industrial discharge(s)," which <u>incorrectly</u> includes "wastewater discharged from a municipal wastewater treatment plant requiring a pretreatment program." NCWQA believes that the definitions in .0701 should be defined separately .0202.

For Rule .0703, NCWQA appreciates the option for temporary credits. NCWQA also believes that forest buffer areas associated with stream mitigation projects should be allowed to generate both stream and nutrient offset credits in spatially overlapping areas. This position is also supported by the 2019 Ross Memo, which encourages allowing a single project to generate credits for multiple markets:

- "Projects that generate multiple types of credits may promote more holistic resource improvements, including habitat and wetland restoration and protection of endangered and threatened species on a local, watershed, or landscape scale.
- "For example, if a single project reduces pollution discharges into waterways, reduces air emissions, and creates wetlands or wildlife habitat in accordance with an established marketbased trading or banking program, the project proponent should be able to generate and sell credits within each of those programs or markets.
- "The ability to generate multiple types of credits may create additional financial incentives for landowners, conservationists and may promote portfolio diversification and increased financial opportunity for existing and future credit providers." Ross Memo at 5.

Regarding Rule .0711, the proposed rule would require municipalities to implement stormwater management programs "throughout their corporate limits and extraterritorial jurisdictions within the basin." Similarly, counties must manage stormwater "throughout their territorial jurisdictions within the basin." Although such municipality-wide requirements may be acceptable for stormwater management programs addressing development projects (assuming they can be governed by applicable building codes), any requirement of a municipality or county to take actions relating to or otherwise regulate stormwater outside of their respective municipal separate storm sewer system (MS4) areas goes beyond federal requirements. For example, a municipality or county should not be required to "identify and remove illegal discharges" for areas where they have no MS4. NCWQA's comments regarding the scope of MS4 requirements in Rule .0711 are equally applicable to Rule .0731, and the same corrections should be made to both rules.

For Rule .0713, NCWQA supports DEQ's decision to allow monitored nonpoint source reductions to be purchased at a 1:1 ratio, and to allow unmonitored nonpoint source reductions to be purchased at a 1.1:1 (10% premium) to address uncertainty. This approach is consistent with EPA's latest trading recommendations – included in the Ross Memo noted above.

NCWQA's comments regarding Rule .0713 are also applicable to Rule .0733. However, NCWQA questions why Rule .0733 removes all references to the Tar-Pamlico Basin Association, or why the section does not include the provision in Rule .0713 that grants a facility's nutrient allocation to another facility that accepts all of the first facility's wastewater. We assume the allocation would be dealt with by contract between the two entities and then the contractual reallocation addressed in both entities respective NPDES permits. Another discrepancy between Rule .0713 and Rule .0733 is that the latter allocates to "facilities treating industrial waste waters" (which should not include POTWs) the lesser of its allocation and offset credits, the Best Available Technology, or 3.2 mg/L total nitrogen and 0.5 mg/L total phosphorous.

NCWQA Comments April 16, 2019 Page 3

Also, Rule .0733 requires 1.1:1 credit purchase for unmonitored nonpoint sources for new facilities but omits the same requirement for expanding facilities. It is unclear what this omission means, given that Rule .0703(j)(4) generally requires 1.1:1 ratio for credits obtained from unmonitored nonpoint sources. Although it is preferable that this particular discrepancy be corrected for the sake of clarity, discrepancies like these only emphasize that the nutrient strategy rules for the different basins could use consolidation to facilitate consistency.

UNRBA Comments on Nutrient

Changes Proposed for 15 A NCAC 02B .0240 Nutrient Management and Nutrient Offset Requirements

April 16, 2019

As part of DEQ's efforts to engage stakeholders on a number of rules readoptions, the UNRBA provided comments in November 2017. These comments included recommendations for:

- The chlorophyll-a standard.
- The buffer rules for the Neuse Estuary TMDL strategy.
- The local implementation requirement in the Neuse Estuary TMDL rules for stormwater programs
- The changes in 2B .0240 regarding use of nutrient offsets.

As DEQ proceeded with the readoption process, water quality standards, buffer rules, and the nutrient management (including nutrient offset provisions) rules were sent out for public review and comment by three separate processes. The UNRBA provided separate comments on the proposed water quality standards rules and the buffer rules. We appreciate the consideration given to our buffer rules comments and the changes made to the proposed package. We hope that DEQ and the EMC will adopt into the final rule the recommendations we made on the chlorophyll-a standard.

The UNRBA also appreciates the consideration given to our comments concerning the proposed changes to 2B .0240. However, this document provides additional comments on the proposed changes to 2B .0240 which is drafted to become 2B .0703:

1. We believe that the revised language provided in the last two sentences of .0703(a) provides protection of the nutrient trading and compliance

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provisions of the Falls Lake Rules. The UNRBA generally supports the inclusion of this language and believes it preserves the provision in session law that delays changes in the Falls Lake Rule until the UNRBA has completed its Falls Lake Nutrient Management Strategy reexamination. The subject language has been highlighted below.

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- (a) <u>PURPOSE. The purpose of this Rule is to establish standards and procedures</u> <u>applicable to providers for approval of nutrient reduction projects and</u> <u>associated nutrient offset credits that will be transferred to persons or</u> <u>entities subject to nutrient rules of this Subchapter. Nutrient offset credits</u> <u>represent a compliance option where allowed by nutrient rules of this</u> <u>Subchapter. Nutrient offset credit is distinct from nutrient accounting for</u> <u>direct compliance with individual nutrient strategy rules, which is not</u> <u>governed by this rule. Nutrient accounting includes joint compliance by</u> <u>multiple local governments as authorized in individual nutrient strategy</u> <u>rules.</u>
- 2. We have concerns about some aspects of the language proposed for (I) of the rule. There is no subpart of the rule entitled "installing projects." However, the project plan requirements are contained in (e) of the rule at (2). It immediately follows (1) NUTRIENT OFFSET BANKING INSTRUMENT and later the rule requires at (3) FINANACIAL ASSSURANCES before (4) PROJECT PLAN APPROVAL. The phrase "installing projects in accordance with this rule" should be narrowed. It appears that local governments must comply with the part of the rule that requires any nutrient credit generators to establish a bank. As a general principle local government should not have to establish a bank since they will not be trading credits for payment. These self-generated credits will be used for jurisdictional compliance or for combined compliance. As proposed, this provision is in conflict with GS 143-214.11, which bars local governments from establishing a bank (except those that were in existence prior to the statutory change). There is not a benefit to requiring additional,

unnecessary "process" to the development of credits. There are sufficient constraints and performance standards for making sure that such credits are properly established, monitored and tracked.

The proposed rule should be modified to allow compliance by showing that the project meets the requirements of .0703 (e)(2) and (4).

NPDES permittees who are local governments cannot establish a nutrient bank. See statutory references:

§ 143-214.26. Nutrient offset credits.

(a) Nutrient offset credits may be purchased to partially offset nutrient loadings to surface waters as required by the Environmental Management Commission. Nutrient offset projects authorized under this section shall be all of the following:

(1) Consistent with rules adopted by the Commission for implementation of nutrient management strategies.

(2) Located within the same hydrologic area, as defined in G.S. 143-

214.11, in which the associated nutrient loading takes place.

(b) A government entity, as defined in G.S. 143-214.11, may purchase nutrient offset credits through either:

(1) Participation in a nutrient offset bank that has been approved by the Department if the Department approves the use of the bank for the required nutrient offsets.

(2) Payment of a nutrient offset fee established by the Department into the Riparian Buffer Restoration Fund established in G.S. 143-214.21.

§ 143-214.11. Division of Mitigation Services: compensatory mitigation.

(a) Definitions. - The following definitions apply to this section:

(1) Compensatory mitigation. - The restoration, creation, enhancement, or preservation of jurisdictional waters required as a condition of a permit issued by the Department or by the United States Army Corps of Engineers.

(1a) Compensatory mitigation bank. - A private compensatory mitigation bank or an existing local compensatory mitigation bank.

(1b) Existing local compensatory mitigation bank. - A mitigation bank operated by a unit of local government that is a party to a mitigation banking instrument executed on or before July 1, 2011, notwithstanding subsequent amendments to such instrument executed after July 1, 2011.
(2) Government entity. - The State and its agencies and subdivisions, or the federal government. "Government entity" does not include a unit of local government unless the unit of local government was a party to a mitigation banking instrument executed on or before July 1, 2011, notwithstanding subsequent amendments to such instrument executed after July 1, 2011, notwithstanding subsequent amendments to such instrument executed after July 1, 2011.

- 3. We also are concerned with the requirement in (e)(2)(D) to provide "Documentation of the condition of the site during the baseline period of the applicable nutrient strategy." While this may be a slightly easier task in Falls than in the Lower Estuary area, both are high hurdle. There needs to be some language allowing latitude on this factor.
- 4. In (g)(5), a SCM can be replaced by natural ecological processes under certain circumstances. This brings forward a couple of questions. How will the nutrient credit values be established for compliance purposes when that change occurs and is allowed to stay in place instead of being replaced by a SCM? Will the funds put into the non-wasting endowment be allowed to be adjusted to the new needs for protection vs the cost of replacement of the SCM that was destroyed? The Fiscal Note comments on this issue and addresses a narrow set of SCMs but allows all SCMs to avoid replacement. This provision should be revised.
- 5. The Fiscal Note concerning the credit ratio between non-point to point source should be modified to remove the negative tone. This note is inconsistent with the direction provided by the EMC and doesn't reflect the

reality of using non-point nutrient reduction practices to provide credit to be used for point source compliance. DEQ has adopted a number of nutrient reduction practices related to non-point source reduction requirements and those are allowed at a 1 to 1 basis. The non-point to point ratio of 1.1 to 1 is appropriate. These credits are essential to providing wastewater service in the future while still achieving reduction in nutrients.

6. The UNRBA became aware of the following comment that will be submitted:

Rule: 15A NCAC 02B .0240 (proposed to change to .0703 Nutrient Offset Credit Trading (b)(4))

Currently proposed rule language:

(4) Nutrient offset credits may be used to satisfy regulatory obligations incurred in the Neuse 01 8-digit cataloguing unit, as designated by the U. S. Geological Survey, below the Falls Lake watershed only if they were generated by a nutrient reduction project within that same geographic area.

The following recommend amendment to the rule is provided (highlight provided):

(4) Nutrient offset credits may be used to satisfy regulatory obligations incurred in the Neuse 01 8-digit cataloguing unit, as designated by the U. S. Geological Survey, <u>outside of</u> the Falls Lake watershed only if they were generated by a nutrient reduction project <u>located outside of the Falls Lake</u> <u>watershed</u>.

The recommended language follows the intent of the rules more clearly.

Aldermen

Sabrina Bengel Jameesha S. Harris Robert V. Aster Johnnie Ray Kinsey Barbara J. Best Jeffrey T. Odham



CITY OF NEW BERN

300 Pollock Street, P.O. Box 1129 New Bern, NC 28563-1129 (252) 636-4000

April 15, 2019

Mr. John Huisman DWR - Water Planning Section 1611 Mail Service Center Raleigh, NC 27699-1611 (919) 707-3677 nps-comments@ncdenr.gov

RE: Comments on Proposed Nutrient Rules for Neuse River Basin for New and Expanding Wastewater Discharger

Dear Mr. Huisman:

The City of New Bern both individually and as a member of the Neuse River Compliance Association (NRCA), submits the enclosed comments on the EMC's proposed nutrient rules revising 15A NCAC 02B .0234.0713 (Neuse Nutrient Strategy: Wastewater Discharge Requirements).

We support the revisions to the rule with particular interest in the offset requirement for new and expanding facilities of 1.1 to 1.0 ratio and the 10 year planning window. The Neuse Management Strategy has been in place over 20 years and the owners of wastewater treatment facilities in the NRCA have demonstrated, through state of the art biological nutrient removal facilities, its commitment to complying with the objective of the strategy and providing economic growth. In addition, the EPA has recently stated it's strong support of this type of nutrient management strategy through a memo issued on February 6th, 2019; "Updating the Environmental Protection Agency's (EPA) Water Quality Trading Policy to Promote Market-Based Mechanisms for Improving Water Quality"

There are members (due to the issuance of the nitrogen allocations in 1997), that are now presented with the inability to project growth because of exceeding their allocation with no owner of those allocations willing to make long term leases or sell nitrogen allocations.

Therefore, we respectfully support the proposed rules with technical considerations that the NRCA will file on the proposed nutrient rules.

Please feel free to contact me if there should be any questions or if additional information is needed.

Best Regards, Jordan B. Hughes, P.E.

City Engineer

Everything comes together here.

Dana E. Outlaw Mayor

Mark A. Stephens City Manager The Neuse River Compliance Association is most appreciative of the close examination of its prior comments by the EMC members in the determination of how the proposed rules were sent to notice. The changes in the Neuse Estuary sources of nitrogen loading have been significant in the past 20 years. The members of the NRCA have invested heavily in reducing their loading of TN – more than \$400 million in plant upgrades. In addition, the NRCA members continue to improve their collection systems to reduce SSOs as a source of TN loading.

ADAPTIVE MANAGEMENT STRATEGY. Unfortunately, the TN loading of the Estuary does not appear to have made any significant progress from its conditions in the late 1990s when the TMDL was prepared. The point sources are reaching the point that future service needs in the basin are in jeopardy due to the other sources of loading. Accordingly, the NRCA supports the addition to the Purpose and Scope rule for the Neuse Estuary as shown at 15A NCAC 2B .0232 .0710 of an Adaptive Management strategy. There is a clear need to identify additional TN loading sources for mandatory reductions so that point sources can continue to provide needed public service while performing at the remarkable levels of TN reduction now being achieved. It may also be appropriate to address the difference in loading between organic and inorganic sources of nitrogen in this iteration of the TMDL strategy. The new load is shown to be coming from organic nitrogen and that provides no basis for an additional reduction requirement for the NRCA members.

SET INDIVIDUAL TN LIMITS FOR POINT SOURCES WITH PERMITTED FLOWS LESS THAN 0.5 MGD. The NRCA supports many of the changes made to 15A NACA 2B .0234 .0713 in the proposed rules. The NRCA remains unable to understand the decision by DEQ to ignore the plain language in (5)(v) of the rules. Unlike the other point sources listed in (5)(ii)-(iv), the point sources with permitted flows less than 0.5 MGD are not assigned an individual discharge allocation in their NPDES permits. Those sources exceed their collective annual discharge allocation of 138,000 pounds and have become an important source of TN loading as well as creating a substantial inequity for the customers of the NRCA which are paying to reduce their TN loading. The NRCA urges the Hearing Officers to address that inequity by rule amendment as DEQ is unwilling to enforce the current rule.

CREDIT FOR FORESTED BUFFER RESTORATION. The NRCA supports Option 2 in 15A NCAC 2B .0240.0703(d)(3). Restored forest riparian buffers are identified as one of the most cost effective and enduring forms of nutrient control and removal from loading. In the Fiscal Note, the practice is the example given of the form of SCM which does not need to be replaced if damaged once mature. The EMC should incentivize this important recovery technique for the nutrient impaired waters of the State.

CLARIFY THAT NPDES FACILITIES DO NOT NEED TO ESTABLISH A NUTRIENT BANK TO BUILD CREDITS FOR USE BY THE FACILITY. The NRCA is concerned that the proposed rules create an obstacle which will make it impossible for any of its members, other than the City of Raleigh, to be able to use the nutrient credit opportunity provided in 15A NCAC 2B .0240 .0703(I). By that addition to the Nutrient Offset Credit Trading rule, WWTPs are supposed to be able to generate their own nutrient credits for use in expanding existing plants or adding new plants. This problem arises from two sources; (1) N.C. Gen. Stat. 143-214.26 is the sole statute setting forth authority of the EMC to regulate nutrient offset projects for the purpose of generating nutrient offset credits and (2) the proposed rule, as explained in the current fiscal note will require the WWTPs to establish a nutrient bank. The pertinent text from the Fiscal Note includes the following:

5.4.12 REVISIONS IN PARAGRAPH (L), NPDES WASTEWATER PERMITTEE-RESPONSIBLE NUTRIENT OFFSET PROJECTS Paragraph (I) clarifies that NPDES wastewater permittees can establish nutrient offset banks to address

nutrient permit requirements. This vertically-integrated approach to nutrient trading is consistent with nutrient trading models nationally. Further, it potentially provides opportunities for municipal NPDES wastewater permittees to generate nonpoint source credits using methods that are not traditionally utilized by private providers, such as installation of nutrient reduction practices on public land or in urban areas. . . .

Actually, paragraph (I) contrasts with paragraph (k) by the fact that the operative sentence imposing the establishment of an offset bank is omitted.

(k) DEVELOPER-RESPONSIBLE NUTRIENT OFFSET PROJECTS. A developer subject to new development stormwater requirements of this Subchapter may satisfy its nutrient reduction obligations by generating its own offsite credits. It may do so by establishing a nutrient offset bank and generating credits in accordance with this rule. Alternatively, the developer shall comply with all provisions of this rule governing the generation of nutrient offset credits by a provider with the following modifications:

- (1) Instead of a credit release schedule, credit for the project may be assigned upon construction of the project and submission of the as-built report as described in the project plan;
- (2) Credit shall be assigned at a 50 percent rate based on the design specifications of the fully completed project(s); and
- (3) Liability for the generation of credits as described in the project plan remains with the developer until the completion of all milestones associated with the project.

(I) NPDES WASTEWATER PERMITTEE-RESPONSIBLE NUTRIENT OFFSET PROJECTS. A locality, authority, utility, or sanitation district operating a permitted wastewater facility subject to wastewater rules of this Subchapter may generate nutrient offset credits by installing projects in accordance with this rule. Any credits generated may then be utilized for compliance purposes as if acquired from another provider.

While (I) of the rule is silent on the question, it uses the phrase "installing projects in accordance with this rule." Especially in light of the Fiscal Note, the rule can be read to require that the NPDES permittees must comply with all the provisions as set out in (e). Those requirements include the establishment of a nutrient credit bank.

The General Statutes are not clear as to whether a local government can use credits that it generates if the credits are placed in a nutrient credit bank. In addition, the better reading of the statutes is that a local government cannot establish a nutrient credit bank unless the local government had established a mitigation bank, as provided in N.C. Gen. Stat. §143-214.11, prior to July 1, 2011. Raleigh is the only local government in the Neuse Basin which meets that

criterion. See N.C. Gen. Stat. §§143-214.11(a)(2)¹ and 143-214.26²(b) and (c). To avoid this set of issues, the proposed rules should be amended to make clear that NPDES facilities do not have to establish a nutrient bank to use credits the NPDES facilities create. Corresponding changes should also be made in the Fiscal Note.

The Fiscal Note does not explain why the EMC considers it necessary for a NPDES wastewater permittee which is using the nutrient credits for its own compliance needs to establish a nutrient bank. The purpose of the provision is to make it easier for compliance when the nutrient credits will be owned and used by the permit holder. To achieve that end, the following revisions are recommended for the proposed paragraph (I). The proposed changes are shown with highlight and red font.

(I) NPDES WASTEWATER PERMITTEE-RESPONSIBLE NUTRIENT OFFSET PROJECTS. A locality, authority, utility, or sanitation district operating a permitted wastewater facility subject to wastewater rules of this Subchapter may generate nutrient offset credits by installing projects in accordance with (e)(2) and (4) of this rule. Any credits generated may then be utilized for compliance purposes by the permitted wastewater facility as if acquired from another provider. Before a permitted waste water facility can be eligible to sell nutrient credits, the permitted wastewater facility must comply with (e)(1) and (3) of this Rule.

¹N.C. Gen. Stat. §143-214.11(a) (2) Government entity. - The State and its agencies and subdivisions, or the federal government. "Government entity" does not include a unit of local government unless the unit of local government was a party to a mitigation banking instrument executed on or before July 1, 2011, notwithstanding subsequent amendments to such instrument executed after July 1, 2011.

² § 143-214.26. Nutrient offset credits.

(a) Nutrient offset credits may be purchased to partially offset nutrient loadings to surface waters as required by the Environmental Management Commission. Nutrient offset projects authorized under this section shall be all of the following:

- (1) Consistent with rules adopted by the Commission for implementation of nutrient management strategies.
- (2) Located within the same hydrologic area, as defined in G.S. 143-214.11, in which the associated nutrient loading takes place.
- (b) A government entity, as defined in G.S. 143-214.11, may purchase nutrient offset credits through either:
 - (1) Participation in a nutrient offset bank that has been approved by the Department if the Department approves the use of the bank for the required nutrient offsets.
 - (2) Payment of a nutrient offset fee established by the Department into the Riparian Buffer Restoration Fund established in G.S. 143-214.21.

(c) A party other than a government entity, as defined in G.S. 143-214.11, may purchase nutrient offset credits through either:

- (1) Participation in a nutrient offset bank that has been approved by the Department if the Department approves the use of the bank for the required nutrient offsets.
- (2) Payment of a nutrient offset fee established by the Department into the Riparian Buffer Restoration Fund established in G.S. 143-214.21. This option is only available to an applicant who demonstrates that the option under subdivision (1) of this subsection is not available. (2009-337, s. 4(a)-(c).)

ALLOW USE OF BEST AVAILABLE INFORMATION TO ESTABLISH BASELINE. The NRCA requests that the EMC allow for documentation of the site conditions with the best available information to show the baseline conditions. In 15A NCAC 2B .0240.0703(e)(2)(D), an applicant for a nutrient credit project is required to provide "Documentation of the condition of the site during the baseline period of the applicable nutrient strategy." The ability to establish the site conditions for the Neuse Estuary in the early 1990s is very limited. To the extent that records existed, they are being regularly retired or destroyed. The rule should be amended to allow the use of best professional judgment based on the available information.

RESTORE NUTRIENT CREDIT PROJECTS UNLESS DOCUMENTED REDUCTIONS ARE BEING

ACHIEVED. Nutrient credits are the only feasible way for upper basin Neuse Estuary WWTPs to address the additional growth now occurring in the basin. The Town of Clayton and Johnston County have immediate needs to grow beyond their nutrient allocation permit limits. Johnston County has relied on land application to meet its needs for a number of years. Raleigh has similar problems which will become more acute in another 15 years when the current allocation is expected to be exhausted. The cost of nutrient credits is significant and should be expected to become greater with increased demand. The WWTPs will be responsible for demonstrating that they have sufficient credits to support their TN loading.

In proposed 15A NCAC 2B .0240.0703 (g)(5), a SCM can be replaced by natural ecological processes under certain circumstances. Neither the rule nor the Fiscal Note addresses how the nutrient credit values will be established for compliance purposes when that change occurs and is allowed to stay in place instead of being replaced by a SCM.

This is the language from the Fiscal Note on this issue. It addresses a narrow set of SCMs but allows all SCMs to avoid replacement.

The final provision of this paragraph addresses the potential impacts of natural disasters, most likely hurricanes or fire. Presently, most nutrient offset projects use the agricultural buffer restoration practice, which is designed to restore a natural ecological community. The project duration is 5-7 years, during which the most critical phase of restoration occurs. If the site is impacted during that project period, providers will be required to restore the site. Beyond that period, the foliage at the site is expected to become more resilient as the plantings mature. Because large scale disturbance events are part of the natural ecological condition, and because ecological succession can be relied upon to restore the site without the need for dedicated new plantings, the Division will not require further restoration by the landowner or steward after project completion. Inclusion of this provision reduces risk for the landowner and long-term steward and therefore reduces the amount for funding necessary for a non- wasting endowment by the provider. To date, this has been a largely theoretical issue and no formal policy is in place to address it. Therefore, it establishes the benchmark in these situations and results in neither a cost nor a benefit.

REVISE THE FISCAL NOTE TO ADD THE EPA TRADING POLICY ISSUED FEB. 6, 2019. The Fiscal Note give considerable attention to the EPA Trading framework. After the Fiscal Note was approved, EPA issued a new memorandum on its nutrient trading policy. The Fiscal Note should be amended to incorporate and address the new memorandum.

REVISE THE FISCAL NOTE TO REMOVE THE INFORMATION USED TO UNDERMINE THE PROPOSED RULE AT 15A NACA 2B -0234 .0713. The Fiscal Note went to great lengths to undermine the EMC's proposed rule change for the nutrient credit ratio to be applied when new or expanding WWTPs rely on nutrient credits. That information should be deleted.

REVISE THE FISCAL NOTE TO REMOVE THE INFORMATION ASSERTING THAT ADEQUATE CAPACITY EXISTS IN THE BASIN FROM THE EXISTING NUTRIENT ALLOCATIONS.

The Fiscal Note asserts that adequate capacity exists in the basin from nutrient allocations to support the growth needs of the upper basin jurisdictions. Despite a showing by NRCA members that there is no capacity available for sale or lease to support these needs, the EMC approved the Fiscal Note. This inaccurate information should be removed or, at a minimum amended to show that multiple jurisdictions have been unsuccessful in finding capacity to meet their needs for the expansion or addition of NPDES facilities.



April 15, 2019

Mr. John Huisman DWR - Water Planning Section 1611 Mail Service Center Raleigh, NC 27699-1611 (919) 707-3677 nps-comments@ncdenr.gov

RE: Comments on Proposed Nutrient Rules for Neuse River Basin for New and Expanding Wastewater Discharger

Dear Mr. Huisman:

The City of Wilson, both individually and as a member of the Neuse River Compliance Association (NRCA), submits the following comments on the EMC's proposed nutrient rules revising 15A NCAC 02B .0234.0713 (Neuse Nutrient Strategy: Wastewater Discharge Requirements).

We support the revisions to the rule with particular interest in the offset requirement for new and expanding facilities of a 1.1 to 1.0 ratio and the 10 year planning window. Growth is essential for all communities to thrive and prosper. To allow growth, we must be innovative in our approach to basin wide management and the environment, while keeping utility costs affordable for our customers. In our opinion, the proposed nutrient rule changes strike a balance between these concerns. The Neuse Management Strategy has been in place over 20 years and the owners of wastewater treatment facilities in the NRCA, including Wilson's regional facility, have demonstrated, through state of the art biological nutrient removal facilities, their commitment to complying with the objective of the strategy while providing economic growth at a reasonable cost. Some high growth communities despite spending hundreds of millions of dollars to achieve this high level of treatment have utilized all their 1997 nitrogen allocations and are not able to grow. Very little or no NPDES allocations are available for purchase from other permit holders. We know this because we have been approached to sale part of our allocation, but the City of Wilson will not sell any of our allocation, because this allocation must be held for our own growth.

Therefore, we the City of Wilson respectfully support the proposed rules with technical considerations that the NRCA will file on the proposed nutrient rules.

Respectfully submitted,

Harry Tyson

Deputy City Manager City of Wilson

Barry A. Part

Barry G. Parks Director of Water Resources City of Wilson

Enclosure: EPA Trading Policy Memorandum

WATER RESOURCES DEPARTMENT



April 15, 2019

Mr. John Huisman DWR - Water Planning Section 1611 Mail Service Center Raleigh, NC 27699-1611 (919) 707-3677 nps-comments@ncdenr.gov

RE: Comments on Proposed Nutrient Rules for Neuse River Basin for New and Expanding Wastewater Discharger

Dear Mr. Huisman:

The Town of Apex, both individually and as a member of the Neuse River Compliance Association (NRCA), submits the following comments on the EMC's proposed nutrient rules revising 15A NCAC 02B .0234.0713 (Neuse Nutrient Strategy: Wastewater Discharge Requirements).

We support the revisions to the rule with particular interest in the offset requirement for new and expanding facilities of 1.1 to 1.0 ratio and the 10 year planning window. The Neuse Management Strategy as been in place over 20 years and the owners of wastewater treatment facilities in the NRCA have demonstrated, through state of the art biological nutrient removal facilities, its commitment to complying with the objective of the strategy and providing economic growth. There are members, due to the issuance of the nitrogen allocations in 1997, are now presented with the inability to project growth because of exceeding that allocation with no owner of those allocations will to make long term leases or sell nitrogen allocations.

Therefore, we respectfully support the proposed rules with technical considerations that the NRCA will file on the proposed nutrient rules.

Respectfully submitted,

David Hardin Water Resources Specialist Town of Apex "SERVICE"

ELECTRIC SERVICE (919) 553-1530

VEHICLE MAINTENANCE (919) 553-1530

April 16, 2019

Mr. John Huisman DWR - Water Planning Section 1611 Mail Service Center Raleigh, NC 27699-1611 (919) 707-3677 nps-comments@ncdenr.gov

RE: Comments on Proposed Nutrient Rules for Neuse River Basin for New and Expanding Wastewater Discharger

Dear Mr. Huisman:

The Town of Clayton, both individually and as a member of the Neuse River Compliance Association (NRCA), submits the following comments on the EMC's proposed nutrient rules revising 15A NCAC 02B .0234.0713 (Neuse Nutrient Strategy: Wastewater Discharge Requirements).

We support the revisions to the rule with particular interest in the offset requirement for new and expanding facilities of 1.1 to 1.0 ratio and the 10 year planning window. The Neuse Management Strategy has been in place over 20 years and the owners of wastewater treatment facilities in the NRCA have demonstrated, through state of the art biological nutrient removal facilities, its commitment to complying with the objective of the strategy and providing economic growth.

The Town and other members, due to the issuance of the nitrogen allocations in 1997, are now presented with the inability to project growth because of exceeding that allocation, as of this writing we have not been able to identify any other users who are willing to sell or provide long term leases on their current allocations.

Therefore, we respectfully support the proposed rules with technical considerations that the NRCA will file on the proposed nutrient rules.

Respectfully submitted,

James Warren Town of Clayton Wastewater Treatment Superintendent

"ENVIRONMENT"

PUBLIC WORKS (919) 553-1530

WATER RECLAMATION (919) 553-1535

TOWN OF CLAYTON

OPERATIONS CENTER

03/28/2019

NC DEQ Public Hearing, Clayton NC

J. D. Solomon, Hearing Officer

I am James Warren, Wastewater Treatment Superintendent representing the Town of Clayton. I also serve on the executive committee of the Neuse River Compliance Association.

I am speaking to the revisions to Rules 02B.0234, 240

The Town of Clayton supports the revisions to the rules as written.

The revisions in the rule would help mitigate the current cost of nutrient offset for new or expanding wastewater facilities by adding flexibility in the timing during the permitting stage and reductions in costs by allowing a 10 year permanent purchase at the 1 to 1.1 ratio.

Due to the time constraints of this hearing will keep my comments brief. As part of the hearing process the Town will be submitting a written response to clarify some of the contents in the Fiscal Note, and to comment on the current availability of nitrogen credits available for purchase in the basin.

Clayton, Johnston County and the towns and cities in Wake County have enjoyed increased growth over past two decades. Clayton's population alone has grown from 5,870 in 1996 to 22,283 in 2018. Population growth and industrial expansions have led Clayton to develop increased wastewater capacity. The Town of Clayton currently operates a 2.5 mgd WRF with agreements with Johnston County and the City of Raleigh to treat up to 2.34 of bulk wastewater. It should be noted that the 1 mgd contract with the City of Raleigh has a finite term and is due to expire in 2027 and will need to be replaced. A recent capacity has identified 9.227 mgd could be required by the end of 2037. The study identified roughly 100 million in hard capital costs with another 70 million needed for nitrogen. These costs are quite the challenge for our 8,000 present customers. Other communities are or will be facing these same challenges in the future. The nutrient offset challenge coupled with effects of HB 436 has made providing the necessary infrastructure burdensome especially for smaller systems.

In closing, Clayton is dedicated to providing its citizens and industrial partners an environmentally sound and financially stable utility service.

The Town would like to thank all of the stakeholders in this process.

Contentnea Metropolitan Sewerage District

CMSD POST OFFICE BOX 477 GRIFTON, NORTH CAROLINA 28530

CHARLES M. SMITHWICK, JR. DISTRICT MANAGER

April 15, 2019

Mr. John Huisman DWR-Water Planning Section 1611 Mail Service Center Raleigh, NC 27699-1611 (919) 707-3677 nps-comments@ncdenr.gov

Re: Comments on Proposed Nutrient Rules for Neuse River Basin for New and Expanding Wastewater Discharger

Dear Mr. Huisman:

The Contentnea Metropolitan Sewerage District (CMSD), both individually and as a member of the Neuse River Compliance Association (NRCA), submits the following comments on the EMC's proposed nutrient rules revising 15A NCAC 02B. 0234.0713 (Neuse Nutrient Strategy: Wastewater Discharge Requirements).

We support the revisions to the rule with particular interest in the offset requirement for new and expanding facilities to 1.1 to 1.0 ration and the 10 year planning window. The Neuse Management Strategy has been in place over 20 years and the owners of wastewater treatment facilities in the NRCA have demonstrated, through state of the art biological nutrient removal facilities, its commitment to complying with the objective of the strategy and providing economic growth. There are members, due to issuance of the nitrogen allocations in 1997, are now presented with the inability to project growth because of exceeding that allocation with no owner of those allocations willing to make long term leases or sell nitrogen allocations.

The CMSD has invested over \$30 million in infrastructure improvements (the NRCA membership over \$400 million) and with the economic growth in our geographical area, we may not be able to accommodate this growth due to financial constraints imposed by this proposed ruling.

Therefore, we respectfully support the proposed rules with technical considerations that the NRCA will file on the proposed nutrient rules.

Respectfully submitted, hal sol South of

Charles M. Smithwick, Jr. District Manager, CMSD

DEPARTMENT OF PUBLIC UTILITIES POST OFFICE BOX 2263 SMITHFIELD, N.C. 27577 (919) 989-5075

April 16, 2019

Mr. John Huisman DWR - Water Planning Section 1611 Mail Service Center Raleigh, NC 27699-1611

RE: Comments on Proposed Nutrient Rules for Neuse River Basin for New and Expanding Wastewater Discharger

Dear Mr. Huisman:

Johnston County, both individually and as a member of the Neuse River Compliance Association (NRCA), submits the following comments on the EMC's proposed nutrient rules revising 15A NCAC 02B .0234.0713 (Neuse Nutrient Strategy: Wastewater Discharge Requirements).

Johnston County supports revisions to the rule with particular interest in the offset requirement for new and expanding facilities of 1.1 to 1.0 ratio and the 10-year planning window. The Neuse Management Strategy as been in place over 20 years. Furthermore, the owners of wastewater treatment facilities in the NRCA have demonstrated, through state of the art biological nutrient removal facilities, their commitment to complying with the objective of the strategy and providing economic growth.

The nitrogen allocation issued to Johnston County in 1997 is not sufficient to accommodate the nearterm projected growth demands. Therefore, like several other members of the NRCA, the County must secure additional nitrogen allocation to expand our wastewater treatment plant. Johnston County has been unable to identify available allocation for purchase within the basin (with the exception of 1,000 lbs of estuary N allocation) or long-term lease (beyond 10-20 years).

Therefore, we respectfully support the proposed rules with technical considerations that the NRCA will file on the proposed nutrient rules.

Respectfully submitted,

Chandra C. Farmer

Chandra C. Farmer, PE Director of Utilities

cc: Rick J. Hester, Johnston County Manager

D-31



Post Office Drawer A Goldsboro, NC 27533

Phone (919) 735-3329

PUBLIC UTILITIES DEPARTMENT Michael Wagner, Deputy Public Works Director-Utilities

www.goldsboronc.gov

April 15, 2019

Mr. John Huisman DWR - Water Planning Section 1611 Mail Service Center Raleigh, NC 27699-1611 (919) 707-3677 nps-comments@ncdenr.gov

RE: Comments on Proposed Nutrient Rules for Neuse River Basin for New and Expanding Wastewater Discharger

Dear Mr. Huisman:

The City of Goldsboro, both individually and as a member of the Neuse River Compliance Association (NRCA), submits the following comments on the EMC's proposed nutrient rules revising 15A NCAC 02B .0234.0713 (Neuse Nutrient Strategy: Wastewater Discharge Requirements).

We support the revisions to the rule with particular interest in the offset requirement for new and expanding facilities of 1.1 to 1.0 ratio and the 10-year planning window. The Neuse Management Strategy has been in place over 20 years and the owners of wastewater treatment facilities in the NRCA have demonstrated, through state of the art biological nutrient removal facilities, its commitment to complying with the objective of the strategy and providing economic growth. There are members, due to the issuance of the nitrogen allocations in 1997, are now presented with the inability to project growth because of exceeding that allocation with no owner of those allocations willing to make long term leases or sell nitrogen allocations.

Therefore, we respectfully support the proposed rules with technical considerations that the NRCA will file on the proposed nutrient rules.

Respectfully submitted,

Michael Wagner Deputy Public Works Director-Utilities (919) 735-3329

GRIFOLS

Grifols Therapeutics LLC 8368 U.S. 70 Bus Hwy West Clayton, NC 27520 USA

Tel. 919-359-7900 www.grifols.com

April 12, 2019

NCDEQ/Division of Water Resources –Nonpoint Source Planning Branch 1611 Mail Service Center Raleigh, NC 27699-1611

Re: Neuse River Basin – Nutrient Sensitive Waters Management Strategy: Wastewater Discharge Requirements

Dear Mr. Huisman,

Grifols appreciates the opportunity to provide public comment on the proposed rule 15A NCAC 02B.0713, Neuse Nutrient Strategy: Wastewater Discharge Requirements. We commend the North Carolina Department of Environmental Quality (NCDEQ) for its continued efforts to protect the waters of North Carolina while also allowing for the continued growth and vitality of the state's economy. We believe that the proposed rule is a positive step forward for wastewater dischargers along the Neuse River and would like to highlight two particular issues for further discussion:

1) Finalize 15A NCAC 02B.0713(7)(b) as proposed regarding new facility nitrogen allocation and offset credit requirements.

2) Consider revising the requirements of 15A NCAC 02B.0713(7)(d)(ii) due to lack of clarity.

Background

Grifols is a global healthcare company with an over 75-year history of improving the health and well-being of people around the world. Grifols is a leading producer of specialized plasma-derived medicines used to treat rare, chronic, and often life threatening diseases, many of which are produced at Grifols' manufacturing site in Clayton, North Carolina. Grifols employs a workforce of over 2,600 in North Carolina, with over 1,600 of those employees work in Clayton, making Grifols the largest single private employer in Johnston County.

Since 2011, Grifols has invested over \$800 million in North Carolina and is committed to further capital investment in Clayton, which will result in a doubling of our manufacturing capacity by 2022. This growth promises new jobs for North Carolinians and more product to meet the growing demand for plasmamedicines. It also requires new solutions for the treatment and disposal of wastewater created as a byproduct of manufacturing in Clayton. Grifols is committed to helping develop solutions in the Neuse River Basin that both protect the ecosystem and allow for continued economic growth in Johnston County.

Discussion

1) Finalize 15 NCAC 02B.0713(7)(b) as proposed regarding new facility nitrogen allocation and offset credit requirements.

Grifols would particularly like to highlight and commend the proposed changes in proposed rule 02B .0713(7)(b) and request that NCDEQ finalize these changes without further alteration. We believe the proposed rule promotes sustainable economic growth by reducing the period of years for which a new facility must have nitrogen allocation or offset credits to no less than 10 years, by reducing the percentage of additional offset credits needed from to 100% to 10%, and by removing the requirement that applicants attempt to acquire nitrogen allocation from existing dischargers prior to using nitrogen offset credits.

The changes proposed allow for greater applicant flexibility in meeting its environmental obligations, encouraging economic growth in the Neuse River Basin without compromising the protection of the Neuse River or its estuary.

2) Consider revising the requirements of 15A NCAC 02B.0713(7)(d)(ii) due to lack of clarity.

Grifols appreciates the intent behind this rule; however, there is no established consensus on what the "best available technology economically achievable" is for many categories of industrial facilities. Furthermore, DEQ provides no clear guidelines on how to demonstrate the best available technology economically achievable which results in uncertainty in the permitting process. The rule as currently written requires a new industrial facility to meet "whichever is less" of either 3.2 mg/l total nitrogen or the best available technology economically achievable. The best available technology economically achievable is generally defined as the performance associated with the best control and treatment measures that facilities in an industrial category are capable of achieving. It is contradictory to require a facility to meet the lower of the best available technology and 3.2 mg/l. If the best available technology is demonstrated to be above 3.2 mg/l total nitrogen it may be technically or economically infeasible for an industry to meet 3.2 mg/l.

For the reasons described above, Grifols requests revision of 15A NCAC 02B.0713(7)(d)(ii) to provide clarity on the requirements to determine total nitrogen effluent limits for new industrial dischargers. We request DEQ provide clear guidelines on how to demonstrate the best available technology economically achievable in order to clarify the permit application requirements and streamline the permitting process for new industrial dischargers.

* * * * * *

Thank you in advance of your consideration of Grifols' comments regarding the treatment and discharge of wastewater into the Neuse River Basin. We look forward to seeing the final rule and continuing to work with the NCDEQ to ensure environmental protection while also contributing to a thriving economy in North Carolina.

If you have any questions, please contact me by telephone at 919-359-4027 or by email at Doug.Burns@grifols.com.

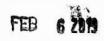
Sincerely,

Doug Burns President Grifols Therapeutics, LLC 8368 US 70 Bus Hwy W. Clayton, NC 27520



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460



OFFICE OF WATER

MEMORANDUM

- **SUBJECT:** Updating the Environmental Protection Agency's (EPA) Water Quality Trading Policy to Promote Market-Based Mechanisms for Improving Water Quality
- FROM: David P. Ross Assistant Administrator

Orss

TO: Regional Administrators, Region 1-10

In recent years, the EPA has worked closely with states and tribes to encourage the development of numeric water quality criteria and Total Maximum Daily Loads (TMDLs) in an effort to reduce pollution in our Nation's waterways. These and other Clean Water Act regulatory tools remain available to states, tribes, and stakeholders; however, the EPA believes that market-based programs, including water quality trading, as well as incentive- and community-based programs can be used more effectively than they have to date to achieve water quality improvements. These types of programs can operate independent of or in coordination with the EPA's traditional regulatory programs to maximize environmental outcomes. The EPA is issuing this memorandum to provide additional flexibility to states and tribes to encourage states, tribes, and stakeholders to consider how market-, incentive- and community-based programs may supplement their water quality improvement efforts.¹ The Agency's expectation is that states and tribes will develop robust and defensible water quality trading programs that comply with the Clean Water Act and result in water quality improvements.

Purposes of this Memorandum

1) To reiterate the EPA's strong support for water quality trading and other market-based programs to maximize pollutant reduction efforts and improve water quality.

2) To accelerate the adoption of market-based programs that will incentivize implementation of technologies and land use practices that reduce nonpoint pollution in our Nation's waters.

3) To provide additional guidance to states, tribes, and stakeholders regarding the use of market-based programs to reduce water pollution at lower overall cost.

4) To promote increased investment in conservation actions.

¹ The terms "water quality trading" and "market-based" are used throughout this memorandum, but states, tribes, and stakeholders should consider incorporating the principles outlined below into other types of incentive- and community-based programs, as well as other collaborative approaches to achieving water quality improvements, including, for example, pay-for success programs, coordinated point/nonpoint pollution reduction or offset projects, and environmental bonding efforts.

Background

The EPA strongly supports water quality trading and other market-based programs that can promote water quality improvements at a lower cost.² The EPA has long interpreted the Clean Water Act to allow pollutant reductions from water quality trading, offsets and other similar programs to be used for ensuring compliance with regulatory requirements.³ These mechanisms, however, have not been used to their fullest potential in part because the EPA's existing policy may limit that potential.

In 2003, for example, the EPA issued its Water Quality Trading Policy (2003 Policy),⁴ which included options for states, tribes, and stakeholders to consider when developing water quality trading programs. Contrary to the Agency's intent and expectations, the 2003 Policy has not facilitated the widespread adoption of water quality trading. Based upon a detailed review of the 2003 Policy, as well as information and data received through informal stakeholder outreach, the Agency now believes that the 2003 Policy may be too prescriptive to be widely effective and implementable.

A detailed and prescriptive set of recommendations may have been preferred when the EPA issued the 2003 Policy. However, in the intervening fifteen years nonpoint pollution reduction technologies and practices have improved, research has helped inform the effectiveness and performance of many nonpoint practices, technical mapping and robust modeling programs have become capable of evaluating resources at the edge-of-field and at the landscape scale, and in-stream and other monitoring approaches have expanded our understanding of the resources we are working to protect. These significant advances in resource management tools have created an opportunity for the Agency to modernize its water quality trading policies. The EPA acknowledges that some small-scale market-based projects have successfully implemented recommendations from the 2003 Policy and supports the continued application of the 2003 Policy for those projects. The Agency may consider future stakeholder engagement to determine the continued utility of the 2003 Policy. To facilitate broader adoption of market-based programs in the near-term, the Agency is now announcing some "Market-Based Principles" that are designed to encourage creativity and innovation in the development and implementation of market-based pollutant reduction programs.

The EPA further understands the 2003 Policy has been interpreted by many states, tribes, and stakeholders as having the force and effect of law, mandating certain actions or outcomes, and containing standards or requirements with which a market-based program must comply. Like all agency guidance documents, the 2003 Policy provides recommendations to states, tribes, and stakeholders, but the Agency cannot mandate any specific regulatory action, outcome or requirement without first going through the rulemaking process. This memorandum is intended to provide ideas and opportunities for

² For further information regarding Clean Water Act water quality trading, including examples of prior trading efforts, see: <u>https://www.epa.gov/npdes/water-quality-trading</u>.

³ Water quality trading was recognized for its potential to reduce pollutant discharges into waterways at least as far back as the 1960s. J.H. Dales, 1968. *Land, Water, and Ownership*, Canadian Journal of Economics, vol1(4), pages 791-804, November. In the 1980s, based on air emissions trading models, several water quality trading pioneering efforts were initiated, such as such as Fox River, Wisconsin and Lake Dillon, Colorado, though formal trades were not undertaken until the 1990s.

⁴ U.S. EPA, *Water Quality Trading Policy*, January 13, 2003, <u>https://www.epa.gov/sites/production/files/2016-04/documents/wqtradingtoolkit_app_b_trading_policy.pdf</u>.

states. tribes, and stakeholders to consider as they develop market-based water quality improvement policies.

Market-based programs intended to facilitate compliance with effluent limits and other legal requirements must comply with the Clean Water Act. Consistent with the cooperative federalism foundation of the Clean Water Act, states and tribes should work with stakeholders to understand what types of market-based programs may work best for their resource needs. Today's memorandum identifies six broad market-based principles that the EPA supports to reduce pollutants in our Nation's waters. These principles do not represent the universe of policy options available to states, tribes, and stakeholders; rather, they are intended to encourage creativity and innovation in state and local policy development.

The EPA acknowledges that some principles in this memorandum may differ from the 2003 Policy and other guidance or technical memoranda the Agency previously issued concerning water quality trading. The intent of this memorandum is to clarify and expand the range of policy options available for states. tribes. and stakeholders to consider. States and tribes should adopt policy principles that will be most effective for their communities and resources. The EPA is committed to assisting states. tribes. and stakeholders with developing new market-based programs, refining existing programs that have not been widely implemented, engaging in problem solving, and facilitating flexible approaches to achieving meaningful pollutant reductions. The Agency may also consider mechanisms to provide greater long term regulatory certainty, including modernizing its regulatory programs.

Market-Based Principles

States. tribes, and stakeholders should consider implementing water quality trading and other marketbased programs on a watershed scale.

- Focusing on a watershed boundary for planning and achieving water quality improvements is often more appropriate than using a municipal or jurisdictional boundary.
- Working within a larger geographic area may facilitate greater market opportunities and participation, resulting in larger scale resource improvements over time.
- The EPA encourages states and tribes to work together to achieve resource improvements through interstate market-based programs and other collaborative approaches.

The EPA encourages the use of adaptive management strategies for implementing market-based programs.

- Demanding too much precision in measuring or predicting pollutant reductions from certain types of discharges, e.g., point source stormwater and nonpoint source runoff, can be an impediment to market-based programs. Stormwater and nonpoint source discharges and related reductions can be subject to confounding natural variability not typically seen with traditional point sources which can make them difficult to estimate. Similarly, though the environmental benefits of stormwater and nonpoint reductions may be significant, they may not be immediately or precisely measurable in the

- resource. Accordingly, the EPA encourages states, tribes, and stakeholders to consider allowing credits to be generated and verified based on scientifically defensible estimates of pollutant reductions from applicable technologies and land-based practices.
- States, tribes, and stakeholders should consider whether third-party credit verification, aggregation, or audit service providers may add value to market-based programs without being overly burdensome or cost prohibitive to participants.
- Market-based programs should include adaptive management concepts to allow improvement and refinement over time without sacrificing regulatory certainty for existing market participants.
- Policy makers and stakeholders pursuing a small market-based program should consider structuring the program so it can be integrated into a larger regional program in the future.
- Regulators should consider identifying, recommending, or endorsing current models that can provide accountability and near-term regulatory and market certainty for generating and verifying credits. In the alternative, regulators should consider whether models used for this purpose should be designed with certain characteristics to promote, for example, transparency and regulatory certainty. In either case, a program should allow modeling and measurement strategies to evolve and improve over time, without sacrificing certainty for market participants. The use of appropriate models and verification practices may reduce or eliminate the need for trade ratios which ultimately reduce the value of a water quality credit and increase the cost of participation.

Water quality credits and offsets may be banked for future use.

- Allowing banking and future use of water quality credits encourages early adoption of pollutant reduction practices, reduces risks associated with practice failures, and will likely broaden and strengthen the marketplace for buyers and sellers, resulting in larger scale resource improvements over time.
- To further reward early adopters, states, tribes, and stakeholders should consider whether existing practices could generate credits or offsets on a look-back basis. For example, activities that reduce runoff and nonpoint source discharges may have occurred before a trading program was established. Within a look-back framework, if those activities or pollution controls are sufficiently documented they may have generated credits, even though they occurred before the trading program was established. If a program authorizes credits to be generated on a look-back basis, it may reduce or eliminate the need for investment or "seed money" to finance the first round of credit-generating pollutant reductions because look-back credits may be available for purchase at the time or soon after the market begins operating.

The EPA encourages simplicity and flexibility in implementing baseline concepts.

- Overly rigid and complicated baseline policies and expensive baseline requirements are often a barrier to entry into a market-based program.
- Complicated baseline calculations can create regulatory and market uncertainty.
- Documented current conditions can provide a simple and appropriate baseline: for facilities subject to permit conditions or other legal requirements, a program that uses current conditions as a baseline should require full compliance with legal requirements.

In watersheds with approved TMDLs, states, tribes, and stakeholders should consider whether it is appropriate to apply the load allocation baseline uniformly across the watershed, or instead apply it on a geographic basis within the watershed to maximize water quality improvements and minimize the risk of hot spots. For example, a resource manager may determine that reductions of nonpoint pollution at certain locations within the watershed will result in reductions sufficient to meet the TMDL load allocation baseline (e.g., at the headwaters of streams or along the shoreline of the impaired waterbody). In some cases, TMDLs or TMDL implementation plans may need to be modified to provide additional flexibility.

A single project may generate credits for multiple markets.

- Projects that generate multiple types of credits may promote more holistic resource improvements. including habitat and wetland restoration and protection of endangered and threatened species on a local, watershed, or landscape scale.
- For example, if a single project reduces pollutant discharges into waterways, reduces air emissions, and creates wetlands or wildlife habitat in accordance with an established market-based trading or banking program, the project proponent should be able to generate and sell credits within each of those programs or markets.
- The ability to generate multiple types of credits may create additional financial incentives for landowners, conservationists and innovators to participate in market-based environmental improvement projects, and may promote portfolio diversification and increased financial opportunity for existing and future credit providers.

Financing opportunities exist to assist with deployment of nonpoint land use practices.

- The EPA encourages the use of innovative financing mechanisms to promote integrated point and nonpoint pollutant reduction strategies, including the use of environmental and community bonds. Section 319 grants. State Revolving Loan Funds, and Water Infrastructure Finance and Innovation (WIFIA) funds.
- The EPA also offers financial technical support through the Water Finance Center. The Water Finance Center is an information and assistance center, helping communities make informed decisions for drinking water, wastewater, and stormwater infrastructure. The Water Finance Center works with communities, financial institutions and experts to explore leading-edge approaches to procurement and funding solutions, and developing roadmaps that identify and support best practices. This includes new and emerging finance approaches that address water quality and quantity challenges such as: Pay for Success, Pay for Performance, green bonds, energy and water performance contracting, water quality trading, and additional conservation financing strategics.

HALL & ASSOCIATES

Telephone: 202-463-1166

Suite 701 1620 I Street, N.W. Washington, D.C. 20006-5004 Web Site: <u>http://www.hall-associates.com</u> Reply to E-mail: jhall@hall-associates.com

Fax: 202-463-4207

April 9, 2019 Via Email: <u>nps-comments@ncdenr.gov</u>. Mr. John Huisman North Carolina DEQ DWR - Water Planning Section 1611 Mail Service Center Raleigh, NC 27699-1611 (919) 707-3677 nps-comments@ncdenr.gov

RE: Comments on Proposed Rulemaking - 15A NCAC 02B .0229.0733 Tar-Pamlico New and Expanding Wastewater Discharger

Dear Mr. Huisman:

Hall and Associates hereby provides comments on NCDEQ's proposed rulemaking revising 15A NCAC 02B .0229.0733 (Tar-Pamlico New and Expanding Wastewater Discharger) on behalf of the Tar-Pamlico Basin Association ("TPBA" or the "Association"). Individual members of the Association will be submitting comments under separate cover. As discussed below, the Association respectfully requests that the provisions of this rule be revised to only apply to "non-association" entities. This change, if implemented, will reflect (1) the scope of the existing rule applicable to the Tar-Pamlico Basin, (2) the express terms of the 2015 Tar-Pamlico Basin Agreement (a contractual agreement between TPBA and NCDEQ), (3) the Association's watershed permit (negotiated with NCDEQ and also finalized in 2015) and (4) the adopted nutrient TMDL for the Tar-Pamlico. Based on discussions with Division staff, we understand that there is no objection to accommodating this request.

Background and Basis for Not Adopting the Rule Amendment as Presently Worded

In mid-December, DWR staff briefed the Association regarding the scope and intent of the proposed regulatory amendment. This was the first opportunity for Association members to discuss the matter with the Division, though other stakeholder meetings had been conducted in the Neuse River Basin. At this meeting, the Division staff indicated that they believed that amending the existing provision (which previously did not apply to Association members) was in the interests of the Association, because it would, among other things, simplify any required antidegradation review related to the nutrient issue. However, the Association members noted

that the rule revision would undercut the basic regulatory framework negotiated with NCDEQ that has been implemented successfully for the past 28 years. That regulatory framework only established a specific "group" load cap, but not individual performance requirements for members of the Association – new, expanding, or otherwise. If specific, individual, stringent TN and TP limitations are applied to any new or expanding discharge, there would no longer be a reason to be an Association member. Thus, this provision would, in the end, lead to the demise of this highly successful program, contrary to express intent of the parties and the governing contractual commitments as represented by the 2015 Tar-Pamlico Basin Agreement.

The specific reasons that the proposed rule amendment is inappropriate and contrary to existing, binding regulatory requirements are stated below:

Basis for Objecting to the Proposed Rule Amendments

The proposed regulatory action fundamentally alters and undercuts the basic program structure that was established to control nutrients in the Tar-Pamlico Basin by the consent of all parties 28 years ago. For that reason, and those enumerated further below, TPBA objects to the inclusion of TBPA members under the proposed rule's permitting procedures for imposing specific effluent limitations on new and expanding dischargers. Our reasons for objection include:

1. The proposed provisions directly violate the Association's agreement with NCDEQ with respect to new and expanding TPBA members that was signed in July 2015

The Association has a long-standing Nutrient Sensitive Waters Implementation Strategy that serves as a contractual agreement between NCDEQ and the TPBA regarding multiple aspects of how and whether nutrient reductions apply to Association members. (Enclosure) Phase IV of this agreement was signed in July 2015 and ratified by the Environmental Management Commission (EMC). That agreement provides for a "group" TN loading cap applicable to the entire Association and does not establish any individual permit requirements for any Association members new or expanding facilities. That is why the existing regulation found at 15A NCAC 02B .0229.0733 only applies to non-association dischargers in the Basin. Page 19 of the agreement specifically addressed the intended requirements for "new and expanding" Non-Association facilities. It noted that the rules at issue would be modified to reflect this Phase IV agreement and only apply to non-Association facilities. (""Any new requirements adopted through the rules re-adoption will be applied to non-Association facilities at that time.") TP NSW Agreement at 19. For reasons that are not explained anywhere in the rule proposal, the proposed rule modification violated this express understanding and expanded the requirements to Association members as well.

Via this agreement, communities have expanded operations, over time, so long as the load cap is met. The approved strategy has worked effectively to ensure that the adopted TMDL TN and TP load reduction requirements are met, with a considerable margin of safety. Presently, the group is operating at about 72 % of the loading cap, even though wastewater flows have increased over time. At design flow *for the entire Association* (~ 62.5 MGD) the Phase IV agreement notes that a group performance of 4.7 mg/l (annual average) would be required. TP NSW Agreement at 20. Presently the Association is discharging about 34 MGD. It is not anticipated that the Association would approach its design flow for at least another 20 years. Therefore, it is further noted that imposition of a 3.0 mg/l TN requirement, in particular, for any new or expanding Association

member is clearly more restrictive than necessary to meet the established loading targets under any circumstances over the next 20 years and therefore is also without any objective need.

There are also specific provisions that govern the addition of new facilities to the Association's membership (*See*, TP NSW Agreement at 10, 14 and 19). These provisions do not specify that specific concentration limitations shall be met for any member added to the Association. Association members are only governed by the load reduction caps contained in the agreement, as adopted in the 1991 TMDL (absent some demonstration of localized impacts). So long as these load reduction requirements are met, the Association and its members are in full compliance with water quality-based limitations (*See*, TP NSW Agreement at 18). By adding new "antidegradation" based requirements, and, in particular, individual facility specific nutrient concentration limitations that apply regardless of load cap compliance, this rule violates the basic terms of the Agreement. Moreover, such "antidegradation" implementation is improper where the facility is under an existing limitation (in this case, a group limitation) and the action (plant expansion) will not result in exceedance of that limitation. So long as a facility is not seeking to increase a load beyond an already authorized permit limitation (which is a specific approval for a level of degradation) then antidegradation rule application is not triggered.

Lastly, the imposition of a specific effluent concentration on any new Association member is also clearly improper. The Phase IV Agreement expressly states: "Should membership change during Phase IV the caps will be adjusted per the methods noted in Section III." (TP NSW Agreement at 14) Page 19 notes that rules 15A NCAC 2B.0229 only applies to "new non-Association dischargers...". Page 20 of the Phase IV Agreement (Section H) stated the following regarding the provisions applicable to new or expanding Non-Association members:

The intent of these recommendations is to ensure that new or expanding non-Association dischargers in the basin do not result in increased nutrient loading to the estuary. They also serve as an incentive for all facilities treating nutrient bearing wastewaters to become Association members, in which case their impacts are regulated through this Agreement.

Novozymes (an existing operation that is seeking its own direct discharge) has indicated that it wishes to become an Association member. The Association has the request under consideration and believes that it may be favorably received. Therefore, the Division should not seek to adopt a rule that precludes the benefit of being an Association member (no specific NSW-related effluent limitation) or the benefit to the TPBA of allowing a new member (fees that may be received for allowing a new member into the Association).

In summary, this rule modification inappropriately modifies the Phase IV TP NSW Agreement by seeking to impose facility specific limitations upon expansion of members facilities. Under the Agreement, no such individual limitation is authorized unless and until the existing load cap allocated to the Association is exceeded. Therefore, the proposed revision should not be adopted as it violates a number of express provisions of the 2015 TP NSW Agreement that is binding between the parties.

2. The provisions are contrary to Phase IV NPDES permits negotiated with the Department over a one-year period, issued in December 2015

Consistent with the Phase IV agreement, throughout 2014 and 2015 NCDEQ negotiated and adopted facility specific NPDES permit requirements applicable to Association members to address enforcement concerns raised by EPA Region IV. In December 2015, the individual permits were issued to the Association members, in addition to the group permit that had been issued to the TPBA for two decades. The Division and EMC agreed that these individual NPDES permit requirements (load allocations) were *only applicable* if the Association, as a whole, exceeded the nutrient load granted to the Association via the approved 1992 TMDL. ("The Division has also worked with the parties to develop a new NPDES group permit that effectively allows the Association to continue operating under the existing 'group cap' approach. ...so long as the Association meets the group caps, the members will not be subject to their individual limits.") TPBA Agreement at 7. Thus, any and all individual loads and facility specific requirements, by definition, only become applicable upon a specific occurrence – a violation of the group load cap, without offset BMP payments sufficient to cure the load exceedance.

The proposed automatic imposition of new, more restrictive facility specific limitations (concentration or load), upon plant expansion, is therefore, also contrary to the NPDES permit presently applicable to the individual association members. Per federal regulation, water quality-based limitations must be demonstrated "necessary" to meet "applicable water quality standards." 40 CFR 122.44(d). Moreover, permit limitations must be consistent with any approved TMDL. 40 CFR 122.44(d)(1)(vii)(B). The proposed rule revisions, as applicable to Association members that already have a specific water quality-based limitation for the nutrient pollutants, are more restrictive than necessary to comply with the approved effluent limitations. Therefore, these provisions exceed authority to impose such limitations under federal and state law.

3. The provisions violate basic principles of the 1991 TPBA Agreement by imposing individual limits on Association members

As noted earlier, the rule inadvertently undercuts the basic principles that fostered the formation of the Association and undermines its existence. By only establishing a single load cap applicable for the entire Association (as opposed to a "doling out" of the cap to each Association member) this allowed smaller communities to avoid high cost improvements that have no demonstrable benefit to system compliance. If any community expanding was automatically forced to provide nutrient removal, the small communities would be forced, over time, into new construction and thereby lose a major benefit of being within the Association. Presently, the program works as "trading" within the group, without the need for monetary compensation. As the load cap approaches, the TPBA will need to make a decision on how to compensate members who treat to higher levels, when others have not. If all members are simply forced to construct additional treatment, this will create a disincentive to having a group at all, and will prevent the implementation of internal trading, which can help the small communities maintain compliance in the most cost-effective manner. 4. The provisions constitute illegal amendment of the 1992 TMDL by establishing individual effluent limitations more restrictive than necessary to meet the TMDL waste load allocation granted to the TPBA.

The TP NSW Agreement recognizes that a nutrient TMDL was established for the basin in 1992. (TP NSW Agreement at 12-13.) <u>https://files.nc.gov/ncdeq/Water%20Quality/Planning/-NPU/Tar%20Pamilco/TarPamFactsheet%202017-02-09.pdf</u>. The TMDL has yet to be modified to establish any more restrictive limitations. However, since its adoption, the EMC has adopted a series of provisions to promote both point and non-point source reduction. At this point, there is no evidence showing that a more restrictive approach to point source control is necessary to achieve the TMDL load reductions and compliance with the State's applicable criteria for nutrients. Therefore, the proposed rule, which will effectively place more restrictive requirements on individual members of the Association (e.g., 3.0 mg/l TN for expanding facilities), is a more restrictive requirement and not consistent with the approved TMDL. Because this new requirement has no demonstrable water quality basis required to attain compliance with the TMDL, it exceeds the requirements of the Clean Water Act, is not consistent with existing state rules and, therefore, should not be adopted.

5. Economic Cost of the Proposal is Not Presented and Benefit Is Negligible

As part of the rule amendment an economic evaluation of the cost and benefit of increased nutrient removal from non-point and stormwater sources was noted. However, there is no apparent evaluation of the cost of forcing all (new or expanding) Association members to implement a 3 mg/l TN reduction requirement (*see*, Fiscal Note). The costs of this requirement would be rather extreme for the smaller communities that presently lack nutrient reduction facilities and considerable for the larger facilities that would have to significantly enhance their operations. Because the TMDL already sets the required target for point sources, and the Association is meeting that target, there is no additional ecological "benefit" achieved for this considerable cost. Therefore, the imposition of this additional cost cannot be justified.

For these reasons, we respectfully request that this proposed rule be withdrawn and/or amended to reflect that the provisions only apply to non-association members. Such action will ensure that the adopted rules applicable to the Tar-Pamlico NWS properly reflect the 2015 TP NSW Agreement that is currently in effect through 2025 and the NPDES permits that have been issued to Association members.

Respectfully submitted,

John CHall

John C. Hall Counsel to the Tar Pamlico Basin Association

Enclosure – 2015 TP NSW Agreement

cc. TPBA Membership



April 15, 2019

Mr. John Huisman DWR – Water Planning Section 1611 Mail Service Center Raleigh, NC 27699-1611 (919) 707-3677 nps-comments@ncdenr.gov

RE: Comments on Proposed Rulemaking - 15A NCAC 02B .0229.0733 Tar-Pamlico New and Expanding Wastewater Discharger

Dear Mr. Huisman:

Greenville Utilities Commission, both individually and as a member of the Tar-Pamlico Basin Association ("TPBA" or the "Association"), hereby provides the following comments on NCDEQ's proposed rulemaking revising 15A NCAC 02B .0229.0733 (Tar-Pamlico New and Expanding Wastewater Discharger). This rule has been revised to treat all new and expanding wastewater dischargers in the Tar-Pamlico Basin (including TPBA members) in the same manner as facilities in the Neuse Basin. We object to this action as our basin rules apply in a distinctly different fashion than those applicable to the Neuse Basin and no stakeholder process or discussion with the Association occurred in advance of the proposed rule, contrary to longstanding State and intergovernmental coordination procedures and protocols. While we understand that the Division believed that the proposed approach would be in the interests of the TPBA membership, we can assure you that understanding was misplaced. Therefore, we respectfully request that you amend the proposed rule to eliminate its application to TPBA members. We request that you prepare a proposed contract based upon the EJCDC "Standard Form of Agreement between Owner and Engineer for Professional Services". Please include an outline of the major tasks anticipated during each phase of the project including projected man-hour estimates and your proposal for compensation.

The proposed regulatory action fundamentally alters and undercuts the basic program structure that was established to control nutrients in our basin by the consent of all parties 28 years ago. For that reason, and those enumerated further below, we object to inclusion of TBPA members under the proposed rule's permitting procedures for new and expanding dischargers. Our reasons for objections include:

PO Box 1847 Greenville, NC 27835 www.guc.com

- The provisions directly violate the Association agreement with NCDEQ with respect to new and expanding TPBA members that was signed I June 2015;
- The provisions are contrary to Phase IV NPDES permits negotiated with the Department over a one-year period, issued in December 2015;

Your Local Advantage

- The provisions violate basic principles of the 1991 TPBA Agreement by imposing individual limits on Association members when no such limitations apply unless the Association exceeds its authorized loading for TN and TP; and
- The provisions constitute illegal amendment of the 1991 TMDL by establishing individual effluent limitations more restrictive than necessary to meet the TMDL waste load allocation granted to the TPBA.

For these reasons, we request that this proposed rule be withdrawn.

Respectfully submitted,

Randall D. Emory, P.E. Director of Water Resources

cc: Mr. Anthony C. Cannon, General Manager/CEO Mr. David W. Springer, P.E., Assistant Director of Water Resources

Kinston Public Hearing Comments on Behalf of TPBA 3/36/19

I am David Springer, Assistant Director of Water Resources for GUC and the current Chairman of the Tar Pamlico Basin Association

I want to go on record today as being in opposition to the rules as currently proposed by DWR Staff with regard to the inclusion of members of the Tar Pamlico Basin Association.

On January 7th, I sent an e-mail to all members of the current EMC stating opposition to these rules on behalf of the TPBA membership along with some of the reasons for our position.

Our attorney, Mr. John Hall, has done a good job relaying the reasons for our objection so I will keep my comments brief.

As you know, the nutrient compliance strategy for the Tar-Pamlico Basin is a collective effort to maintain nutrient levels below the TMDL that has been established for this river basin.

This is a strategy that has been proven to work over the nearly 30 years that it has been in place. We have maintained compliance with our nutrient cap and beyond that we have funded efforts that contribute to the health and protection of the river basin where we work and live.

The current strategy was recognized by our predecessors as an advantageous and economical way for the point dischargers in the Tar-Pamlico Basin to maintain nutrient levels below the established TMDL. I would argue that this model continues to be the best strategy for our communities to maintain compliance while being good environmental stewards.

Successive agreements have been negotiated with the state to govern our compliance with the nutrient limits in our basin. As such, the members of the Tar Pamlico Basin Association have not been covered under the rules currently being modified.

The new rules as written undermine the strategy that was developed with the State for point dischargers in our basin. Even further, they compromise the binding agreement that has been developed with DEQ to govern our basin through 2025.

We have been told that the impacts to our governance were not fully recognized by DWR Staff and as such it was an oversight that we were not included in the stakeholder process for these rule revisions. Upon bringing this issue to the attention of staff, we were told that they were not opposed to excluding us from these rules.

So that is our request this evening. To be excluded from the proposed rules and continue operation in adherence to the strategy and binding agreement that has been put in place to govern the point dischargers in the Tar Pamlico Basin.

Thank You



Town of Pinetops P.O. Drawer C Pinetops, NC 27864 P: 252.827.4435

F: 252.827.2806

www.pinetopsnc.com

April 10, 2019

Mr. John Huisman DWR- Water Planning Section 1611 Mail Service Center Raleigh, NC 27699-1611

RE: Comments on Proposed Rulemaking – 15A NCAC 02B.0229.0733 Tar-Pamlico New and Expanding Wastewater Discharger

Dear Mr. Huisman:

The Town of Pinetops, both individually and as a member of the Tar-Pamlico Basin Association, hereby provides the following comments on NCDEQ's proposed rulemaking revising 15A NCAC 02B .0229.0733. This rule has been revised to treat all new and expanding wastewater dischargers in the Tar-Pamlico Basin (including TPBA members) in the same manner as facilities in the Neuse Basin. We object to this action as our basin rules apply in a distinctly different fashion than those applicable to the Neuse Basin and no stakeholder process or discussion with the Association occurred in advance of the proposed rule, contrary to longstanding State and intergovernmental coordination procedures and protocols. While we understand that the Division believed that the proposed approach would be in the interests of the TPBA membership, we can assure you that understanding was misplaced. Therefore, we respectfully request that you amend the proposed rule to eliminate its application to TPBA members.

The proposed regulatory action fundamentally alters and undercuts the basic program structure that was established to control nutrients in our basin by the consent of all parties 28 years ago. For that reason, and those enumerated further below, we object to inclusion of TBPA members under the proposed rule's permitting procedures for new and expanding dischargers. Our reasons for objections include:

- The provisions directly violate the Association agreement with NCDEQ with respect to new and expanding TPBA members that was signed I June 2015;
- The provisions are contrary to Phase IV NPDES permits negotiated with the Department over a one-year period, issued in December 2015;

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Town of Pinetops P.O. Drawer C Pinetops, NC 27864 P: 252.827.4435 F: 252.827.2806

www.pinetopsnc.com

- The provisions violate basic principles of the 1991 TPBA Agreement by imposing individual limits on Association members when no such limitations apply unless the Association exceeds its authorized loading for TN and TP; and
- The provisions constitute illegal amendment of the 1991 TMDL by establishing individual effluent limitations more restrictive than necessary to meet the TMDL waste load allocation granted to the TPBA.

For these reasons, we request that this proposed rule be withdrawn.

Respectfully submitted,

ress Mayor Steve Burress



Town of Tarboro

P.O. Box 220 – 500 Main Street Tarboro, NC 27886-0220 Telephone (252) 641-4200 Fax (252) 641-4286 www.tarboro-nc.com

March 14, 2019

Mr. John Huisman DWR - Water Planning Section 1611 Mail Service Center Raleigh, NC 27699-1611 (919) 707-3677 nps-comments@ncdenr.gov

RE: Comments on Proposed Rulemaking - 15A NCAC 02B .0229.0733 Tar-Pamlico New and Expanding Wastewater Discharger

Dear Mr. Huisman:

The Town of Tarboro both individually and as a member of the Tar-Pamlico Basin Association ("TPBA" or the "Association"), hereby provides the following comments on NCDEQ's proposed rulemaking revising 15A NCAC 02B .0229.0733 (Tar-Pamlico New and Expanding Wastewater Discharger). This rule has been revised to treat all new and expanding wastewater dischargers in the Tar-Pamlico Basin (including TPBA members) in the same manner as facilities in the Neuse Basin. We object to this action as our basin rules apply in a distinctly different fashion than those applicable to the Neuse Basin and no stakeholder process or discussion with the Association occurred in advance of the proposed rule, contrary to longstanding State and intergovernmental coordination procedures and protocols. While we understand that the Division believed that the proposed approach would be in the interests of the TPBA membership, we can assure you that understanding was misplaced. Therefore, we respectfully request that you amend the proposed rule to eliminate its application to TPBA members.

The proposed regulatory action fundamentally alters and undercuts the basic program structure that was established to control nutrients in our basin by the consent of all parties 28 years ago. For that reason, and those enumerated further below, we object to inclusion of TBPA members under the proposed rule's permitting procedures for new and expanding dischargers. Our reasons for objections include:

- The provisions directly violate the Association agreement with NCDEQ with respect to new and expanding TPBA members that was signed I June 2015;
- The provisions are contrary to Phase IV NPDES permits negotiated with the Department over a one-year period, issued in December 2015;
- The provisions violate basic principles of the 1991 TPBA Agreement by imposing individual limits on Association members when no such limitations apply unless the Association exceeds its authorized loading for TN and TP; and

• The provisions constitute illegal amendment of the 1991 TMDL by establishing individual effluent limitations more restrictive than necessary to meet the TMDL waste load allocation granted to the TPBA.

For these reasons, we request that this proposed rule be withdrawn.

Respectfully submitted,

Troy R. Lewis Town Manager, Town of Tarboro

Town of Robersonville

P.O. BOX 487 ROBERSONVILLE, N.C. 27871 PHONE (252) 508-0311

March 28, 2019

Mr. John Huisman DWR - Water Planning Section 1611 Mail Service Center Raleigh, NC 27699-1611 (919) 707-3677 nps-comments@ncdenr.gov

RE: Comments on Proposed Rulemaking - 15A NCAC 02B .0229.0733 Tar-Pamlico New and Expanding Wastewater Discharger

Dear Mr. Huisman:

The Town of Robersonville, both individually and as a member of the Tar-Pamlico Basin Association ("TPBA" or the "Association"), hereby provides the following comments on NCDEQ's proposed rulemaking revising 15A NCAC 02B .0229.0733 (Tar-Pamlico New and Expanding Wastewater Discharger). This rule has been revised to treat all new and expanding wastewater dischargers in the Tar-Pamlico Basin (including TPBA members) in the same manner as facilities in the Neuse Basin. We object to this action as our basin rules apply in a distinctly different fashion than those applicable to the Neuse Basin and no stakeholder process or discussion with the Association occurred in advance of the proposed rule, contrary to longstanding State and intergovernmental coordination procedures and protocols. While we understand that the Division believed that the proposed approach would be in the interests of the TPBA membership, we can assure you that understanding was misplaced. Therefore, we respectfully request that you amend the proposed rule to eliminate its application to TPBA members.

The proposed regulatory action fundamentally alters and undercuts the basic program structure that was established to control nutrients in our basin by the consent of all parties 28 years ago. For that reason, and those enumerated further below, we object to inclusion of TBPA members under the proposed rule's permitting procedures for new and expanding dischargers. Our reasons for objections include:

- The provisions directly violate the Association agreement with NCDEQ with respect to new and expanding TPBA members that was signed I June 2015;
- The provisions are contrary to Phase IV NPDES permits negotiated with the Department over a one-year period, issued in December 2015;
- The provisions violate basic principles of the 1991 TPBA Agreement by imposing individual limits on Association members when no such limitations apply unless the Association exceeds its authorized loading for TN and TP; and
- The provisions constitute illegal amendment of the 1991 TMDL by establishing individual effluent
- limitations more restrictive than necessary to meet the TMDL waste load allocation granted to the TPBA.

For these reasons, we request that this proposed rule be withdrawn.

Respectfully submitted,

Clizabeth Jenkus

Elizabeth Jenkins Town Manager





April 9, 2019

Mr. John Huisman DWR - Water Planning Section 1611 Mail Service Center Raleigh, NC 27699-1611 (919) 707-3677 nps-comments@ncdenr.gov

RE: Comments on Proposed Rulemaking - 15A NCAC 02B .0229.0733 Tar-Pamlico New and Expanding Wastewater Discharger

Dear Mr. Huisman:

The City of Oxford, both individually and as a member of the Tar-Pamlico Basin Association ("TPBA" or the "Association"), hereby provides the following comments on NCDEQ's proposed rulemaking revising 15A NCAC 02B .0229.0733 (Tar-Pamlico New and Expanding Wastewater Discharger). This rule has been revised to treat all new and expanding wastewater dischargers in the Tar-Pamlico Basin (including TPBA members) in the same manner as facilities in the Neuse Basin. We object to this action as our basin rules apply in a distinctly different fashion than those applicable to the Neuse Basin and no stakeholder process or discussion with the Association occurred in advance of the proposed rule, contrary to longstanding State and intergovernmental coordination procedures and protocols. While we understand that the Division believed that the proposed approach would be in the interests of the TPBA membership, we can assure you that understanding was misplaced. Therefore, we respectfully request that you amend the proposed rule to eliminate its application to TPBA members.

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- The provisions constitute illegal amendment of the 1991 TMDL by establishing individual effluent limitations more restrictive than necessary to meet the TMDL waste load allocation granted to the TPBA.

For these reasons, we request that this proposed rule be withdrawn.

Respectfully submitted,

Antoine L. Lewis

City of Oxford WWTP Superintendent

Town of Louisburg

Office of the Mayor

110 W. Nash St. Louisburg, N.C. 27549 (919) 496-3406 (919) 496-6319 Fax



State of North Carolina

April 1, 2019

Mr. John Huisman DWR - Water Planning Section 1611 Mail service Center Raleigh, N. C. 27699-1611 (919) 707-3677 nps-comments@ncdenr.gov

Re: Comments on Proposed Rulemaking - 15A NCAC 02B .0229.0733 Tar-Pamlico New and Expanding Wastewater Discharger

Dear Mr. Huisman:

The Town of Louisburg, both individually and as a member of the Tar-Pamlico Basin Association ("TPBA" or the Association"), hereby provides the following comments on NCDEQ's proposed rulemaking revising 15A NCAC 02B .0229.0733 (Tar-Pamlico New and Expanding Wastewater Discharger). This rule has been revised to treat all new and expanding wastewater dischargers in the Tar-Pamlico Basin (including TPBA members) in the same manner as facilities in the Neuse Basin. We object to this action as our basin rules apply in a distinctly different fashion than those applicable to the Neuse Basin and no stakeholder process or discussion with the Association occurred in advance of the proposed rule, contrary to longstanding State and intergovernmental coordination procedures and protocols. While we understand that the Division believed that the proposed approach would be in the interests of the TPBA membership, we can assure you that understanding was misplaced. Therefore, we respectfully request that you amend the proposed rule to eliminate its application to TPBA members.

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For these reasons, we request that this proposed rule be withdrawn.

Respectfully Submitted,

alt. and

Karl T. Pernell Mayor

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March 14, 2019

Mr. John Huisman DWR - Water Planning Section 1611 Mail Service Center Raleigh, NC 27699-1611 (919) 707-3677 nps-comments@ncdenr.gov

RE: Comments on Proposed Rulemaking - 15A NCAC 02B .0229.0733 Tar-Pamlico New and Expanding Wastewater Discharger

Dear Mr. Huisman:

The (CITY of Rocky Mount), both individually and as a member of the Tar-Pamlico Basin Association ("TPBA" or the "Association"), hereby provides the following comments on NCDEQ's proposed rulemaking revising 15A NCAC 02B .0229.0733 (Tar-Pamlico New and Expanding Wastewater Discharger). This rule has been revised to treat all new and expanding wastewater dischargers in the Tar-Pamlico Basin (including TPBA members) in the same manner as facilities in the Neuse Basin. We object to this action as our basin rules apply in a distinctly different fashion than those applicable to the Neuse Basin and no stakeholder process or discussion with the Association occurred in advance of the proposed rule, contrary to longstanding State and intergovernmental coordination procedures and protocols. While we understand that the Division believed that the proposed approach would be in the interests of the TPBA membership, we can assure you that understanding was misplaced. Therefore, we respectfully request that you amend the proposed rule to eliminate its application to TPBA members.

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- The provisions constitute illegal amendment of the 1991 TMDL by establishing individual effluent limitations more restrictive than necessary to meet the TMDL waste load allocation granted to the TPBA.

For these reasons, we request that this proposed rule be withdrawn.

Respectfully submitted,

B.F-Bent



Public Utilities 1630 US #1 Hwy Youngsville, NC 27596 Phone: 919.556.6177 Fax: 919.556.6709 www.franklincountync.us

April 16, 2019

Mr. John Huisman DWR - Water Planning Section 1611 Mail Service Center Raleigh, NC 27699-1611 (919) 707-3677 nps-comments@ncdenr.gov

RE: Comments on Proposed Rulemaking - 15A NCAC 02B .0229.0733 Tar-Pamlico New and Expanding Wastewater Discharger

Dear Mr. Huisman:

Franklin County Public Utilities, both individually and as a member of the Tar-Pamlico Basin Association ("TPBA" or the "Association"), hereby provides the following comments on NCDEQ's proposed rulemaking revising 15A NCAC 02B .0229.0733 (Tar-Pamlico New and Expanding Wastewater Discharger). This rule has been revised to treat all new and expanding wastewater dischargers in the Tar-Pamlico Basin (including TPBA members) in the same manner as facilities in the Neuse Basin. We object to this action as our basin rules apply in a distinctly different fashion than those applicable to the Neuse Basin and no stakeholder process or discussion with the Association occurred in advance of the proposed rule, contrary to longstanding State and intergovernmental coordination procedures and protocols. While we understand that the Division believed that the proposed approach would be in the interests of the TPBA membership, we can assure you that understanding was misplaced. Therefore, we respectfully request that you amend the proposed rule to eliminate its application to TPBA members.

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• The provisions constitute illegal amendment of the 1991 TMDL by establishing individual effluent limitations more restrictive than necessary to meet the TMDL waste load allocation granted to the TPBA.

For these reasons, we request that this proposed rule be withdrawn.

Respectfully Submitted,

Christopher Doherty Public Utilities Director

From: Hester, Joey
Sent: Tuesday, April 16, 2019 8:54 PM
To: SVC_NPS-comments <NPS-comments@ncdenr.gov>
Cc: Anne Coan <anne.coan@ncfb.org>; Keith Larick <keith.larick@ncfb.org>; Hudyncia, Joseph
<joseph.hudyncia@ncagr.gov>; Henshaw, Julie <julie.henshaw@ncagr.gov>
Subject: Neuse/Tar-Pamlico Comments (DSWC)

John,

We appreciate the fact that DWR has worked closely with the Division of Soil & Water Conservation to iron out initial concerns in an informal capacity. We think most of the issues we identified in that process have previously been addressed. That said, we have the following recommendations regarding the currently posted Neuse and Tar-Pamlico rule revisions.

Rule 15A NCAC 02B .0702: From conservation practice effectiveness research with agricultural practices, documented effectiveness of the same practice can range from negative to 100% effectiveness depending on many factors, including changing weather patterns. The agricultural research community has always used a margin of safety for calculation of expected results, and they have consistently dropped agriculture's reduction percentage based on updated scientifically available information. The proposed 1:1 nutrient credit trading ratio will fail to account for this uncertainty and will over credit these conservation practices and reduce real-world water quality protection.

Rule 15A NCAC 02B .0703 (c): Given ongoing changes to the agricultural community's reporting requirements and the proposed transition to a 1:1 credit trading ratio, we recommend a reassessment of the nutrient credit being granted to DMS for buffer practices on agricultural lands.

Rule 15A NCAC 02B .0711 (2): recommend adding "lands subject to the agriculture rule are exempted from these requirements"

Rule 15A NCAC 02B .0712 (1)(a) and .0732 (a)(1): recommend removing "a county or". There is no county-specific reduction requirement, and collective compliance exists only at the basin level.

Rule 15A NCAC 02B .0712 (5)(a) and .0732 (d)(3)(A): We have continuing concerns regarding the impact of annual baseline recalculation on agriculture's ability to meet and maintain its nitrogen loss reductions. This change will result in increased workload for BOC, WOC, LAC, and DSWC for little or no environmental benefit. This ongoing uncertainty will also indefinitely complicate or even preclude nutrient trading opportunities with other regulated entities. The EPA encourages "simplicity and flexibility in implementing baseline concepts" (via EPA's 2019 Water Quality Trading Memorandum). An annual baseline recalculation that will change agriculture's nitrogen loss reduction target every year is neither simple nor flexible. Not only is there currently no accepted methodology for determining exactly which agricultural acres have been converted to development explicitly regulated via another rule in the nutrient strategy, but the annual readjustment saddles an ever-shrinking pool of agricultural producers with an increasingly burdensome reduction requirement. Agriculture does not get nutrient reduction credit for DMS or private mitigation bank stream practices implemented on agricultural lands, but those lands are still reported under the collective compliance strategy which aggregates data at the county level. These practices cannot be simultaneously counted by DMS and the BOC for compliance, and so annual baseline recalculation will penalize producers who are otherwise unable to implement nutrient offset practices as more practices are contracted in the future and more acres are lost to development. This recalculation will fundamentally undermine the spirit of collective compliance.

Rule 15A NCAC 02B .0732 (e)(1)(F): This requirement comes directly from SL 2001-355 and therefore cannot be removed.

Thank you for the opportunity to comment on these rule revisions.

Sincerely, NCDA&CS <u>Division of Soil and Water Conservation</u> Ph: (919) 707-3777

E-mail correspondence to and from this address may be subject to the North Carolina Public Records Law and may be disclosed to third parties.



NORTH CAROLINA FARM BUREAU FEDERATION, INC.

PO Box 27766, Raleigh, NC 27611 Phone: 919-782-1705 Fax: 919-783-3593 www.ncfb.org

April 16, 2019

Submitted via email to: nps-comments@ncdenr.gov

Mr. John Huisman NC Division of Water Resources Water Planning Section 1611 Mail Service Center Raleigh, NC 27699-1611

Dear Mr. Huisman,

The North Carolina Farm Bureau Federation (NCFB) is North Carolina's largest general farm organization, representing the interests of farm and rural people in our State. This letter is to comment on the draft rules for the Nutrient Sensitive Waters (NSW) rules for the Tar-Pamlico and Neuse River basins, and Nutrient Offset Credit Trading. Thank you for the opportunity to provide these comments.

NCFB has been involved with NSW issues for decades. NCFB serves on the Basin Oversight Committees (BOCs) for the Tar-Pamlico and Neuse basins, and the Jordan Lake and Falls Lake Watershed Oversight Committees. We do appreciate the effort that DEQ has made to this point to address many of the issues the agriculture community had with previous drafts during the stakeholder process to date. As part of the adaptive management approach proposed by DEQ, NCFB recommends continued strong stakeholder input from the agriculture community in the Division's evaluation.

NCFB has several comments and concerns about the proposed rules, which are outlined below.

Collective Compliance:

NCFB strongly supports the collective compliance approach that is established in the Agriculture Rules of the Neuse and Tar-Pamlico Nutrient Strategies. This approach has allowed the agriculture community to demonstrate long-term compliance with the nutrient reduction goals established in the respective nutrient strategy rules.

.0711(2) and .0731(b):

To further delineate between the requirements for the agriculture community and the stormwater requirements, these rules should be revised to include the statement that lands subject to the agriculture rule are exempted from these rules.

.0712(1)(a) and .0732(a)(1):

NCFB requests that the words "a county or" be removed from these Items. The requirements of the collective compliance approach outlined in these rules applies to the basins as a whole, not individual counties. These Items should be revised to reflect the rule requirements.

Farm Bureau and Agriculture... We keep North Carolina growing!

.0712(5)(a) and .0732(d)(3)(A):

NCFB has continued concerns about the proposed baseline recalculation requirement in these proposed rules. Baseline recalculation could impact the long-term ability of the agricultural community to meet and maintain the nitrogen loss reductions. Agricultural lands in these basins are decreasing, not increasing. We are concerned that a shrinking pool of farms will be responsible for meeting the nutrient reduction goal under the collective compliance approach. This issue is magnified by the loss of nitrogen reduction opportunities due to competition from offset projects through DMS or private mitigation banks, as outlined in our comments below. This issue could also complicate the ability and willingness of farmers to participate in trading programs with other regulated entities. These issues will become even more important when dealing with the Jordan and Falls Lake rules.

Additionally, it will be difficult for the Division of Soil and Water Conservation (DSWC) to track land that has gone into development, versus being idled, transitioned to forestland or pasture, or transitioned to another use besides development. This will create far more workload for the BOCs, DSWC and DEQ with little or no environmental benefit.

.0732(e)(1)(F):

Session Law 2001-355 requires at least five, but no more than ten farmers on each county LAC, and therefore cannot be revised.

Overall Offset/Trading Issues:

Another issue that can complicate the ability of the BOCs to accurately account for agriculture nitrogen losses is the offset trading program, either through DMS or private mitigation banks. When a project is implemented (usually a buffer project) on agriculture land, the agriculture community generally loses the ability to gain additional nitrogen loss reductions on that land. However, under the current system, that acreage is still accounted for in the NLEW tool, and is still factored into the overall 30% reduction requirement. The amount of acreage impacted by these projects should be removed from the responsibility of the agriculture community because they are essentially unavailable for further reductions under the agriculture rule. This would require reporting by DEQ to DSWC to account for the acres impacted by these projects.

As part of the adaptive management approach proposed by DEQ, NCFB recommends that DEQ conduct a review of the credits that are awarded for DMS (or private bank) projects on agricultural lands. Over the period of the agriculture reporting required in these rules, the BOCs responsible for reporting progress for the agriculture goals for the Tar-Pamlico and Neuse basins reviewed additional research on buffer nutrient reduction efficiency conducted by NC State University. As a result of that review, the BOCs reduced the nitrogen reduction percentage awarded for buffer projects under the Agriculture rules. To our knowledge, no similar review has taken place for the DMS (or private bank) credits. This review is especially important in light of the proposed changes to the trading ratios in .0703(j). The comments of the Division of Soil and Water Conservation (NCDA&CS) also address the concerns related to trading ratios.

Thank you for the opportunity to provide these comments. If have questions or need more information please contact us at <u>keith.larick@ncfb.org</u> or <u>anne.coan@ncfb.org</u>.

Sincerely,

Kert O. Land

Keith Larick Natural Resources Director

Anne Coan Director of Environmental Affairs

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www.waynegov.com/domain/45

Phone: (919)734-5281 EXT. 3

3114 Wayne Memorial Drive Suitte158 Goldsboro, NC 27534

Field Office Staff

Ashley Smith, *Director* Katie Stevens-Clarkson, *Cost Share* Thomas Murphrey, *SC 1* Jennifer Sparrow, *Admin* Don Barker, *DC* Brenda Britt, *ATAC*

Board Of Supervisors

Ronald Parks Thomas Uzzell Dennis Waller Phil Yelverton Donna Mills March 13, 2019

Neuse & Tar-Pamlico Rules Re-adoption

RE: Public Comment

To whom it may concern:

We, the Wayne County Soil and Water Conservation District, believe if the new rule under 15A NCAC 02B.0237 (5) Accounting Methodology (a) is passed there will be harmful repercussions. This rule should not come into effect since there is not an accurate way to calculate exactly which lands should be removed from baseline totals. Without an agreed upon standardized method to accurately calculate land that is actively under production, we do not know what implications this change will have. If this rule goes into effect we cannot predict the impact of such a reporting change on our ability to meet our nitrogen loss reduction goals in the future.

Sincerely,

Donna C Mills



www.waynegov.com/domain/45

Phone: (919)734-5281 EXT. 3

3114 Wayne Memorial Drive Suitte158 Goldsboro, NC 27534

Field Office Staff

Ashley Smith, *Director* Katie Stevens-Clarkson, *Cost Share* Thomas Murphrey, *SC I* Jennifer Sparrow, *Admin* Don Barker, *DC* Brenda Britt, *ATAC*

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Don Bake



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Sincerely,

Spanna



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Field Office Staff

Ashley Smith, *Director* Katie Stevens-Clarkson, *Cost Share* Thomas Murphrey, *SC I* Jennifer Sparrow, *Admin* Don Barker, *DC* Brenda Britt, *ATAC*

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Ronald Parks Thomas Uzzell Dennis Waller Phil Yelverton Donna Mills March 13, 2019

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Sincerely,

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Wayne County Soil & Water Conservation District



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Field Office Staff

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hanna Pack Hopel



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Sincerely,

Dennis Waller



Goldsboro Field Office

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Sincerely,

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Goldsboro Field Office

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RE: Public Comment

To whom it may concern:

We, the Wayne County Soil and Water Conservation District, believe if the new rule under 15A NCAC 02B.0237 (5) Accounting Methodology (a) is passed there will be harmful repercussions. This rule should not come into effect since there is not an accurate way to calculate exactly which lands should be removed from baseline totals. Without an agreed upon standardized method to accurately calculate land that is actively under production, we do not know what implications this change will have. If this rule goes into effect we cannot predict the impact of such a reporting change on our ability to meet our nitrogen loss reduction goals in the future.

Sincerely,

Ronald W Park

Wayne County Soil & Water Conservation District

- A moving Baseline is almost impossible to calculate due to the amount of agricultural land lost each year. Unless a consistent and established methodology is provided for all counties and support provided for determining the baseline, the baseline acres should stay at the historically established number. This would insure that all interests are reporting in the same way. By enforcing a moving baseline, the requirements would implement unproportionable restrictions on the remaining producers.
- 2. Additional agricultural best management practices (BMPs) should be added to the calculation of nutrient reduction. As a Soil and Water District, we assist producers with many other nitrogen and phosphorus reducing BMPs that are not given credit in the current reporting system such as, field borders, grass waterways, nutrient management, etc.
- 3. As representatives of the Wake County, we are in full support of the new method for submitting the annual report with no public reporting versus having to be the only stakeholders required to present the report each year. It is our belief that our energy and time is best used by putting conservation on the ground and not doing reporting.

John Huisman -- NC Division of Water Resources

Neuse and Tar-Pamlico Nutrient Strategy Rules Public Comment

The Orange County Local Advisory Committee met on March 13, 2019 and discussed the new rules being proposed for the Neuse and Tar-Pamlico Nutrient Strategy Rules.

The new rule text reads: "Baseline losses and relative loss reduction progress shall be adjusted as frequently as can be supported by available data to account for lands permanently removed from agricultural control through development;"

The Orange LAC feels very strongly to not support this rule change. The local Soil and Water Conservation District staff and Board of Supervisors also have concerns about this proposed rule change, and do not support the approval.

- Per this new language our baseline figures are recommended to change annually to reflect only land that is currently under production, and not land that has been converted to development or other infrastructure. These numbers are not readily available to local staff each year.
- At the time of establishing the baseline, County LAC's and field staff, was committed to ensure that the baseline figures of each report were as accurate as possible, and this rule change requires that we revisit those figures and revise our target each year. Local staff will not have the time or the resources to provide this information yearly.
- As we understand it, at this time, there is no agreed upon methodology for determining exactly which lands should be removed from baseline totals, therefore, we do not know the implications of this change and cannot predict the impact of such a reporting change on our ability to meet our nitrogen loss reduction goals in the future.
- A moving baseline is almost impossible to calculate due to the amount of agricultural land lost each year. Unless a consistent and established methodology is provided for all counties, in addition to support and resources are provided for determining the baseline, the baseline acres should stay at the historically established number. This would insure that all interests are reporting in the same way.
- In the watersheds, there are fewer farmers and by enforcing a moving baseline, the requirements would implement unproportioned restrictions and burdensome requirements on the remaining producers. This penalizes the remaining farmers who have established best management practices on their farms.

Orange County LAC supports the following rule proposal:

- The new rule text reads: "<u>Continue to review, approve and summarize local nitrogen loss annual reports to ensure ongoing implementation of the accounting method approved by the Commission under the original version of this Rule effective August 1998, as conforming to the requirements of Item (5) of this Rule. Continue to submit these reports as initiated in 2002, to the Director annually;"
 </u>
- As we understand, this will allow, the report to be presented to the EMC biannually as part of a broader package which helps contextualize compliance actions with those of other regulated entities.
- It is our belief that the energy and time of the local staff and LAC is best used by putting conservation on the ground and not doing reporting.

Orange County LAC request:

 Additional agricultural best management practices (BMPs) should be added to the calculation of nutrient reductions. The Soil and Water District assist producers with many other nitrogen and phosphorus reducing BMPs that are not given credit in the current reporting system such as, field borders, grass waterways, nutrient management, etc.

Thank you for your consideration.

HYDE SOIL & WATER CONSERVATION DISTRICT

Hvde Government Center • P.O. Box 264 • Swan Quarter, NC 27885 Phone: (252) 926-4195 • Fax: (252) 926-3705

April 4, 2019

Mr. John Huisman Division of Water Resources – Water Planning Section NC Department of Environmental Quality 611 Mail Service Center Raleigh, NC 27699-1611

Re: Proposed Neuse and Tar-Pamlico Nutrient Strategy Rules

Dear Mr. Huisman.

After reviewing the proposed Neuse and Tar-Pamlico Nutrient Strategy Rules, the Hyde Soil & Water Conservation District would like to comment on two of the proposed rule changes:

First, the new rule text reads: "Continue to review, approve and summarize local nitrogen loss_ annual reports to ensure ongoing implementation of the accounting method approved by the Commission under the original version of this Rule effective August 1998, as conforming to the requirements of Item (5) of this Rule. Continue to submit these reports as initiated in 2002, to the Director annually:"

Our district supports this change and believes it will help put our continuing efforts into a broader, more comprehensive context of long-term nutrient reduction and overall basin health.

Second, the new rule text reads: "Baseline losses and relative loss reduction progress shall be adjusted as frequently as can be supported by available data to account for lands permanently removed from agricultural control through development;"

Our district has continuing concerns both about how this change will be implemented and about its potential impact on our ability to meet our reduction goals in the future. This change will likely impose an increasingly burdensome requirement on a shrinking agricultural sector, and we see changing the baseline of a reduction target into an annual recalculation midway through rule implementation as problematic for long-term planning. There are also quite a few nutrient sources that are inadequately addressed in both the current and revised rule languages.

Sincerely,

ruh

J.W. Spencer, Chairman Hyde Soil & Water Conservation District Board of Supervisors

Board of Supervisors: J.W. Spencer • Daren Hubers • Earl O'Neal • Darren Armstrong • Chad Spencer

"Soil and Water, Yours for Life"



FRANKLIN SOIL AND WATER CONSERVATION DISTRICT 101 South Bickett Blvd, Suite B • Louisburg, NC 27549 • (919) 496-3137 • Fax (919) 496-7235

The Local Advisory Committee in Franklin County would like the EMC to consider the interests of what we consider four critical measuring units on meeting our reduction.

The first thing is to always keep the baseline year 1991 and not revise the target each year. Changing the baseline acres annually is going to be hard to get actual acres in ag. We can't see exactly what the impact is going to be with such a reporting change and our ability to meet our nitrogen loss reduction goals in the future.

The second thing is if this change were to happen what are the future requirements famers are going to have to meet for their nitrogen loss reduction. The farmers in the county are using BMP's (Best Management Practices) to the fullest. With the acres changing for each year, there is not a lot the farmer can do to because they are maxed out on measures to reduce the runoff.

The third thing the LAC in franklin feels with changing the annual baseline acres is a reduction target into an annual recalculation midway through rule implementation will cause problems in long-term planning.

The fourth and one of the most important things the LAC feels the need for. Is more research in other nutrient driving sources other than the farm community.

yours for Life

Members of the Franklin LAC.

Mike Wille

till al

LAW OFFICES OF HICKS WRENN, PLLC

Telephone: (919) 693-8161 www.hickswrennlaw.com

N. Kyle Hicks James C. Wrenn, Jr. Gerald T. Koinis C. Gill Frazier, II

PO Box 247 111 Gilliam Street Oxford, NC 27565

April 12, 2019

VIA EMAIL <u>nps-comments@ncdenr.gov</u>

John Huisman DWR-Water Planning Section 1611 Mail Service Center Raleigh, NC 27699-1611

Dear Mr. Huisman:

Please find enclosed Granville County's comments concerning the proposed Neuse and Tar-Pamlico Rules re-adoption. As Granville County has repeatedly expressed to the North Carolina Department of Environmental Quality, Granville County is opposed to the inclusion of Granville County as a local government required to implement the stormwater management requirements of the Tar-Pamlico Stormwater Rules.

Please let me know if you have any questions.

Sincerely,

James C. Wrenn, Jr.

JCWjr/aee

Enclosures

Granville County Comments on Proposed Amendments to the Neuse and Tar-Pamlico Nutrient Strategy Rules (15A NCAC 02B .0229; .0232, .0234-.0240; .0255-.0258; .0701; .0703)

April 9, 2019

Granville County, located near the top of the Tar-Pamlico Watershed, and within two other watersheds, has been implementing strict water quality requirements related to the Neuse River and Falls Lake in its most populous watershed for years. Granville County provides these comments as input to the Division of Water Resources' (DWR) efforts to readopt and amend the Neuse and Tar-Pamlico Nutrient Strategy Rules (15A NCAC 02B .0229; .0232, .0234-.0240; .0255-.0258; .0701; .0703), which include naming Granville County as a local government required to implement the stormwater management requirements of the Tar-Pamlico Stormwater Rule (Rule) as noted in amendments to Section .0258.

Granville County's elected officials have recognized that the County does not meet the criteria for inclusion in the Rule laid out by DWR, as discussed below, and they have addressed this concern as well as the added administrative and regulatory burden in the Resolution dated June 19, 2017, a copy of which is attached as Exhibit A.

As documented in Section 6.4.1.1 of the Fiscal Note, and in information provided to the public by DWR at its March 28, 2019 presentation in Clayton, Granville County was named to the Rules based on its population and population growth in the portions of the County located within the Tar-Pamlico Basin. DWR has presented two triggers for a community being named in the rules, and this comment addresses each trigger separately.

Total Population

First, as described in Section 6.4.1.1 of the Fiscal Note, "only municipalities and counties with populations of at least 5,000 and 20,000 people, respectively, were considered" for inclusion in the Rule.¹ We object to several components of the analysis as presented. The Fiscal Note appears to use the population of the entire jurisdiction as of 2010, rather than the population within the Tar-Pamlico Basin, to compare against this threshold. Table 6-15 in that section shows a 2010 population of 16,548 within the Tar-Pamlico Basin, a figure which is well below the population threshold of 20,000. It is not appropriate to consider population or other characteristics of the County outside the basin of interest in determining application of the Tar-Pamlico Stormwater Rule.

DWR does not disclose its methodology for determining the population within the basin for Granville County. There is a note about Wilson County's geographic distribution between basins, but no information about Granville County's distribution, nor confirmation that this distribution was used to inform either

¹ https://files.nc.gov/ncdeq/documents/files/OSBM%20Approved%20Fiscal%20Note%2012-12-2018.pdf

total population or population growth calculations. Additionally, the Fiscal Note references the population "within the Neuse watershed" which should be irrelevant to the analysis.

In summary, DWR has failed to demonstrate how it arrived at figures representing County population within the Tar-Pamlico Basin. Moreover, it did not use those basin-specific figures in assessment of whether the County meets the total population criteria, as would have been appropriate when considering a basin-specific Rule.

Population Growth

Section 6.4.1.1 of the Fiscal Note further states, "Of those local governments that met that initial criteria [total population] only those with annual growth rates of approximately 200 people per year or greater over the 2000 – 2010 time period were proposed to be added to the rule." The text is not explicit on whether population growth is limited to the area within the basin, but the associated narrative describes "lower population growth in the less urbanizing Tar-Pamlico Basin," suggesting that basin-specific growth is of interest.

Table 6-15 of the Fiscal note reports that the annual population growth of Granville County between 2000 and 2010 was 306 people per year. We find two primary issues with DWR's assessment that Granville County meets the population growth trigger. First, subsequent analysis prepared by the County shows that the data used in DWR's analysis represents a decade quite abnormal from those preceding and following it. The population growth experienced in 2010 is not ongoing. Second, development patterns in the County, supported by actual development permit data, prove that only a small amount of growth is occurring within the Tar-Pamlico Basin; not enough to trigger the population growth threshold.

2000-2010 is Not Representative of Current Conditions

Data used in the analysis supporting the original growth rate conclusion was from the US Census. The NC Office of State Budget and Management (OSMB) offers population figures by County for each decade, which is summarized for Granville County in the table below. 2000-2010 represents much higher growth across the entire County than has been seen in more recent years. Newer information from OSBM with certified population figures through 2017 show a significantly lower growth rate.

	April, beginning year	July, ending year	Difference (Total Growth; %)
1980-1990 ²	34,043	38,341	4,298; 12.6%
1990-1999 ³	38,341	46,413	8,072; 21.1%
2000-20094	48,486	59,529	11,043; 22.8%
2010-2017 ⁵	57,522	60,213	2,691; 4.7%

The Tar-Pamlico Basin is Rural in Nature

² <u>https://files.nc.gov/ncosbm/demog/grow8090.html</u>

³<u>https://files.nc.gov/ncosbm/demog/rty</u>99est.html

⁴ <u>https://files.nc.gov/ncosbm/demog/countygrowth_2009.html</u>

⁵ https://files.nc.gov/ncosbm/demog/countygrowth cert 2017.html

Portions of Granville County are located within three (3) different watersheds, the Neuse, the Tar-Pamlico, and the Roanoke. It is the County's understanding that the growth rate of 306 people per year between 2000 and 2010 reported in Table 6-15 of the Fiscal Note was calculated using the percentage of the County located within the Tar-Pamlico basin, though as previously noted, that methodology is not specified. Further information provided in the Fiscal Note table A-12 shows growth of 158 people per year in the same area through 2016.

Growth in Granville County since 2000 has not been uniform. In order to understand how much of the growth during *this decade* (2010-2020) is happening in the Tar-Pamlico basin, the County assessed residential building permits that were issued (and finaled) during the period 2010 to 2017, and determined how they were distributed between the basins. For each permit, the County determined in which basin the development occurred. A summary of residential development permits issued by basin during the timeframe of interest is presented below, and raw data are included as Exhibit "B".

Pamlico	657	33%
Roanoke	199	10%
Neuse	1,137	57%
Total	1,993	

As shown in the table above, only 33% of growth in Granville County is occurring in the Pamlico basin. Applying the 33% to the population increases for 2010-2017 by OSBM (2,671/7 years = 382 per year), growth in the Pamlico basin portion of Granville County is only 126 people per year (33% * 382 = 126). This figure is far below the 200-person threshold.

Granville County meets neither the total population nor population growth criteria within the Tar-Pamlico Basin and should not be subject to the Rule. Rather, it should have been considered among the other communities referenced in Section 6.7 of the Fiscal Note, where DWR states that it was "unnecessary to include them in the rule and subject them to the costs of developing stormwater programs that are not likely not to be implemented due to the lack of development within their jurisdictions." Though DWR is not clear on its methodology behind adding the County to the Rule, it is clear that only population characteristics within the Tar-Pamlico basin should be considered, and therefore the County's inclusion in the amended rules section .0258 should be reconsidered based on this additional information. EXHIBIT A: Resolution of the Granville County Board of Commissioners dated June 19, 2017

LAW OFFICES OF HOPPER, HICKS & WRENN, PLLC

P.O. BOX 247, 111 GILLIAM STREET OXFORD, NORTH CAROLINA 27565

N. KYLE HICKS JAMES C. WRENN, JR. CINDY P. BOSTIC GERALD T. KOINIS C. GILL FRAZIER, H

TELEPHONE: 919-693-8161 FACSIMILE: 919-693-9938 www.hopperbickswrenu.com

June 26, 2017

VIA E-MAIL TRANSMISSION

Michael.regan@ncdenr.gov

Michael S. Regan, Secretary NC Department of Environmental Quality 217 West Jones Street Raleigh, NC 27603

Dear Secretary Regan:

Please find enclosed a copy of a Resolution adopted by the Granville County Board of Commissioners expressing the Board's opposition to including the unincorporated portions of Granville County in the Tar-Pamlico watershed in the area subject to proposed State stormwater regulations for the Tar-Pamlico Nutrient Strategy. As stated in the enclosed Resolution, conditions in the Tar River and the unincorporated portions of Granville County do not justify further stormwater regulation. Such additional regulation will pose an unreasonable cost to landowners. No reasonable nexus exists between the burden landowners will be forced to bear and protection of the Tar-Pamlico watershed. We appreciate your careful consideration of this issue. We will be happy to answer any questions you may have.

Yours sincerely

James C. Wrenn, Jr.

JCWjr/md

Enclosure Cc John Huisman (via e-mail) Rich Gannon (via e-mail)

RESOLUTION REQUESTING A CHANGE TO THE STATE'S REQUIREMENTS FOR STORMWATER REGULATION UNDER THE PROPOSED TAR-PAMILICO NUTRIENT STRATEGY

D-86

WHEREAS, Granville County, pursuant to the proposed state requirements, will be subject to additional stormwater regulation under the proposed Tar-Pamilco Nutrient Strategy rules.

WHEREAS, portions of unincorporated Granville County are not located with the Tar-Pamlico watershed.

WHEREAS, portions of unincorporated Granville County that are located with the Tar-Pamlico watershed are generally rural in nature.

WHEREAS, Granville County is currently subject to stormwater regulation under Falls Lake Nutrient Strategy rules.

WHEREAS, conditions in the Tar River in unincorporated portions of Granville County are in good quality and do not warrant regulation under a nutrient strategy.

WHEREAS, other counties located within the Tar-Pamlico watershed that neighbor Granville County are not subject to the proposed Tar-Pamlico Nutrient Strategy rules.

WHEREAS, compliance with additional stormwater rules under the proposed Tar-Pamlico Nutrient Strategy rules would be administratively burdensome to the County and would be costly to implement for current and future property owners.

NOW THEREFORE BE IT RESOLVED by the Granville County Board of County Commissioners that the state stormwater regulations proposed in the Tar-Pamlico Nutrient Strategy affecting Granville County be amended by the appropriate state agency so as to not require that unincorporated portions of Granville County be subject to the proposed regulations.

BE IT FURTHER RESOLVED that copies of this resolution be provided to:

- 1) The members of the General Assembly representing Granville County
- 2) The Secretary of the NC Department of Environmental Quality

Adopted this the 19th day of June 2017.

Timothy Karan, Chairman Granville County Board of Commissioners

ATTEST:

Debra A. Weary, Clerk to the Board

A

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street	st_extra	address2
AIRPORT ROAD		OXFORD NC 27565
HIGHWAY 96		OXFORD NC 27565
HIGHWAY 96		OXFORD NC 27565
NC HWY 49		ROXBORO NC 27574
HIGHWAY 96		OXFORD NC 27565
HIGHWAY 96		OXFORD NC 27565
THORNTON ROYSTER RD		OXFORD NC 27565
MOMMIES LANE		OXFORD NC 27565
AMIS CHAPEL ROAD		OXFORD NC 27565
AARON CREEK CHURCH ROAD		OXFORD NC 27565
GRASSY CREEK VIRGILINA RD		OXFORD NC 27565
GRASSY CREEK - VIRGILINA ROAD		OXFORD NC 27565
ROY FRAZIER ROAD		OXFORD NC 27565
ROY FRAZIER ROAD		OXFORD NC 27565
JAMES WINSTON RD		OXFORD NC 27565
AMIS CHAPEL ROAD		OXFORD NC 27565
REUBEN HART ROAD		OXFORD NC 27565
GRASSY CREEK VIRGILINA RD		OXFORD NC 27565
CORNWALL ROAD		OXFORD NC 27565
CORNWALL RD		OXFORD NC 27565
ROBERT MORGAN RD		BULLOCK NC 27507
GRASSY CREEK VIRGILINA RD		BULLOCK NC 27507
FROG HOLLOW RD		OXFORD NC 27565
CATFISH TRAIL		BULLOCK NC
BEECH CREEK ROAD		OXFORD NC 27565
CORNWALL RD		BULLOCK NC 27507
GRASSY CREEK VIRGILINA ROAD		BULLOCK NC
LEE YANCEY RD		
LEE YANCEY RD		BULLOCK, NC 27507
ANGUS PLACE		STEM NC 27581
BLUEBELL LANE		WAKE FOREST, NC 27587
BLUEBELL LANE		WAKE FOREST, NC 27587
ROYCROFT RD		CREEDMOOR NC 27522
RUNNING BROOK DRIVE		CREEDMOOR NC 27522
WHITNEY LANE		CREEDMOOR NC 27522
SARATOGA STREET		
LONELY OAKS DRIVE		CREEDMOOR NC 27522
HILLTOP DRIVE		CREEDMOOR NC 27522
LONELY OAK DRIVE		CREEDMOOR NC 27522
WELLONS DR		CREEDMOOR NC 27522
BEAGLE LANE		CREEDMOOR NC 27522
CEDAR DRIVE		CREEDMOOR NC 27522
ROTTERDAM LANE		CREEDMOOR NC 27522
AMSTERDAM LANE		CREEDMOOR NC 27522
ROTTERDAM LANE		
BREDA LANE		CREEDMOOR, NC 27522 CREEDMOOR, NC 27522
		CREEDMOOR NC 27522
ARNHEM LANE		
AMSTERDAM LANE		CREEDMOOR NC 27522
MAZE DRIVE		CREEDMOOR NC 27522
WELLONS DRIVE		CREEDMOOR NC 27522
WELLONS DRIVE		CREEDMOOR NC
WHEAT DRIVE		
WELLONS DRIVE		BUTNER NC 27509
BLUEBELL LANE		WAKE FOREST, NC 27587
14TH STREET		BUTNER NC 27509
WEST D STREET		BUTNER, NC 27509
		BUTNER NC 27509
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BD00742 PR13481 U2014-0117 06-Feb-1(06-Feb-1) Contractor NEW HOUSE BD00848 PR11498 U2015-1029 17-Sep-1/17-Sep-1/Contractor MODULAR HOME BD00943 PR11498(U2016-1196 21-Sep-1(21-Sep-1(Contractor MODULAR HOME BD00873(PR13595(U2016-0054 13-Jan-1613-Jan-16Contractor NEW HOUSE BD00902 PR11499(U2016-0571 03-May-103-May-1Contractor NEW HOUSE BD00831 PR11499: U2015-0703 07-Jul-15 07-Jul-15 Contractor NEW HOUSE BD00831/PR11499; U2015-0702 07-Jul-15 07-Jul-15 Contractor NEW HOUSE BD00866 PR13590 U2015-1334 03-Dec-1:03-Dec-1: Owner NEW HOUSE BD00778'PR13516;U2014-0865 27-Aug-1-27-Aug-1-Contractor NEW HOUSE BD01025/PR13664(U2017-0857 21-Jul-17 21-Jul-17 Owner MOBILE HOME BD00948'PR11745:U2016-1319 13-Oct-1(13-Oct-1)Owner MOBILE HOME BD00502.PR13218(U2010-0019 11-Jan-1(11-Jan-1(Owner MOBILE HOME BD00505/PR132211U2010-0063 20-Jan-1020-Jan-10Owner MOBILE HOME BD00988 PR11667(U2017-0318 15-Mar-115-Mar-1 Contractor MOBILE HOME BD01043 PR13483! U2017-1106 03-Oct-1; 03-Oct-1; Contractor NEW HOUSE BD00516 PR13231 U2010-0219 12-Mar-112-Mar-1 Contractor NEW HOUSE BD00863/PR12484/U2015-1280 18-Nov-1 18-Nov-1 Contractor NEW HOUSE BD00954 PR13640;U2016-1428 04-Nov-1 04-Nov-1 Contractor MODULAR HOME BD00883 PR13602 U2016-0261 02-Mar-102-Mar-1 Owner NEW HOUSE BD00706/PR13436/U2013-0578 24-Jun-1224-Jun-12Contractor NEW HOUSE BD00492 PR13208(112009-0896 05-Nov-0.05-Nov-0.Contractor NEW HOUSE BD00492/PR13208: U2009-0895 05-Nov-0 05-Nov-0 Contractor NEW HOUSE BD00630/PR13354(U2012-0113 15-Feb-1:15-Feb-1:Contractor NEW HOUSE BD00483 PR13199/U2009-0769 22-Sep-0!22-Sep-0!Contractor NEW HOUSE BD00625/PR13349/U2012-0019 11-Jan-1211-Jan-12Contractor NEW HOUSE BD00557 PR13274{U2010-0866 01-Oct-1(01-Oct-1(Contractor NEW HOUSE BD00513 PR13228;U2010-0162 24-Feb-1(24-Feb-1(Contractor NEW HOUSE BD00497 PR132124U2009-0960 07-Dec-0107-Dec-01 Contractor NEW HOUSE BD00554 PR13272/U2010-0829 23-Sep-1(23-Sep-1(Contractor NEW HOUSE BD00558/PR13276:U2010-0887 08-Oct-1(08-Oct-1(Contractor NEW HOUSE BD00497/PR13212[U2009-0963 07-Dec-0/07-Dec-0/Contractor NEW HOUSE BD00487 PR13203 U2009-0829 12-Oct-0(12-Oct-0) Contractor NEW HOUSE BD00557 PR13274 U2010-0867 01-Oct-1(01-Oct-1(Contractor NEW HOUSE BD00497/PR13212(U2009-0962 07-Dec-0/07-Dec-0/Contractor NEW HOUSE BD00480: PR13196(U2009-0718 10-Sep-0! 10-Sep-0! Contractor NEW HOUSE BD00483 PR13199(U2009-0771 22-Sep-0! 22-Sep-0! Contractor NEW HOUSE BD00476 PR131924 U2009-0668 26-Aug-0' 26-Aug-0' Contractor NEW HOUSE BD00546:PR13261!U2010-0673 OS-Aug-1:O5-Aug-1:Contractor NEW HOUSE BD00479 PR13194: U2009-0701 03-Sep-0: 03-Sep-0: Contractor NEW HOUSE BD00557 PR13275(U2010-0868 01-Oct-1(01-Oct-1(Contractor NEW HOUSE BD00479: PR13194/ U2009-0702 03-Sep-0! 03-Sep-0! Contractor NEW HOUSE BD00548: PR13264: U2010-0720 17-Aug-1(17-Aug-1)Contractor NEW HOUSE BD00519 PR132352U2010-0254 24-Mar-1 24-Mar-1 Contractor NEW HOUSE BD00973/PR13648: U2017-0090 27-Jan-1727-Jan-17 Contractor TOWNHOUSE BD00973 PR13648 U2017-0091 27-Jan-1727-Jan-17 Contractor TOWNHOUSE BD00973; PR13648(U2017-0092 27-Jan-1727-Jan-17Contractor TOWNHOUSE BD00973'PR13648;U2017-0093 27-Jan-1727-Jan-17Contractor TOWNHOUSE BD00974/PR13648/U2017-0094 27-Jan-1727-Jan-17Contractor TOWNHOUSE BD00974 PR13648 U2017-0095 27-Jan-1727-Jan-17Contractor TOWNHOUSE BD01046 PR13681(U2017-1145 12-Oct-1712-Oct-17 Contractor TOWNHOUSE BD01046/PR13681:U2017-1146 12-Oct-1712-Oct-17Contractor TOWNHOUSE BD01046 PR13681; U2017-1147 12-Oct-1; 12-Oct-1; Contractor TOWNHOUSE BD01046 PR13681 U2017-1148 12-Oct-172-Oct-17 Contractor TOWNHOUSE BD01046/PR13681/U2017-1149 12-Oct-1712-Oct-17Contractor TOWNHOUSE BD00554-PR13272!U2010-0830 23-Sep-1(23-Sep-1(Contractor NEW HOUSE BD00510 PR13226: U2010-0127 16-Feb-1(16-Feb-1(Contractor NEW HOUSE BD00516/PR13232/U2010-0216 12-Mar-112-Mar-1 Contractor NEW HOUSE BD00500 PR13215/ U2009-0996 18-Dec-0! 18-Dec-0! Contractor NEW HOUSE BD00501: PR13218: U2010-0009 05-Jan-1C 0S-Jan-1C Contractor NEW HOUSE

16-Apr-1/04-Feb-1/CT00040/086615741347 12-Feb-1(15-Sep-1'CT00165:086616735921 15-Feb-1 20-Sep-1(CT00016-086616736908 25-Apr-1(11-Jan-1(CT00160)086616746084 08-Aug-16 00:00:0(CT00160: 086616747172 02-Dec-1/29-Jun-15 CT001605086616748166 29-Oct-1129-Jun-15 CT001605086616749179 22-Nov-101-Dec-1/CT00077,086800767396 29-May-107-Aug-1 CT00145 087402581336 16-Aug-17 00:00:00 087404263371 20-Jan-17 00:00:00 CT00071/ 087501293731 25-Jan-10.00:00:00 087501360780 26-Mar-1000:00:00 087501360780 01-Jun-17 00:00:00 CT00118(087502766000 16-Feb-1(28-Sep-1) CT00046(087504502912 01-Nov1 12-Mar-1 CT00002(087504518344 25-May-116-Nov-1 CT00118{087603404173 05-Apr-1, 27-Oct-1(CT00129(087604710836 05-Oct-1202-Mar-1 CT000772087604710836 08-Nov-1 21-Jun-12 CT00002, 182400121237 12-Mar-1 03-Nov-0 CT00054:087604803866 10-Mar-103-Nov-0 CT00054-087604804577 07-May-115-Feb-1: CT00054-087604805769 06-Jan-1021-Sep-0'CT00054-087604806971 11-Apr-1:03-Jap-12CT00054-087604807909 19-Jan-1101-Oct-1(CT00054:087604813771 28-Jun-1(23-Feb-1(CT00054:087604813798 13-May-103-Dec-0 CT00054 087604814834 19-Jan-1123-Sep-1(CT00054:087604815657 25-Feb-1: 07-Oct-1(CT00054: 087604815807 20-May-103-Dec-0: CT00054:087604816721 20-Apr-1(09-Oct-05 CT00054:087604816794 01-Mar-1 01-Oct-1(CT00054: 087604816992 15-Apr-1(03-Dec-0' CT00054-087604817743 15-Jan-1009-Sep-0! CT00054:087604818265 27-Jan-1021-Sep-0(CT00054:087604818732 26-Jan-1025-Aug-0 CT00054:087604818790 15-Nov-1 27-Jul-10 CT00054: 087604818981 15-Jan-1002-Sep-01CT00054-087604819426 23-Feb-1:01-Oct-1(CT00054:087604819493 26-Jan-1002-Sep-0(CT00054:087604819688 02-Dec-1(17-Aug-1(CT00054)087604826026 02-Jul-10 24-Mar-1 CT00054: 087604826070 19-Jul-17 24-Jan-17 CT00002f 087604826688 20-Jul-17 24-Jan-17CT00002f087604826688 05-Jul-17 24-Jan-17 CT00002(087604826688 30-Jun-1724-Jan-17CT00002(087604826688 30-Jun-1724-Jan-17CT00002(087604826688 30-Jun-1724-Jan-17CT00002(087604826688 26-Apr-1(10-Oct-1)CT00002(087604828612 26-Apr-1110-Oct-17CT00002(087604828612 01-May-110-Oct-1, CT00002(087604828612 01-May-1 10-Oct-1; CT00002(087604828612 04-May-110-Oct-1, CT00002(087604828612 27-Jan-1123-Sep-1(CT00054:087604910496 24-Jun-1(15-Feb-1(CT00054:087604910815 08-Jul-10 15-Mar-1 CT00054:087604911548 20-May-1 18-Dec-0' CT00054:087604911662 21-May-131-Dec-0' CT00054:087604911759 7TH STREET WEST B STREET ROBERTS CHAPEL ROAD FLEMING ROAD WILL SLITT RD KING DR CARTER CIRCLE CARTER CIRCLE HUNTERS TRL RAVEN WOOD DRIVE RAVEN WOOD DRIVE COBBLESTONE DR WILL SUITT ROAD WILL SLITT ROAD BLUEBELL LANE MASSIMO DRIVE ANDREWS COURT MASSIMO DRIVE RIDGELAND DRIVE RIDGELAND ROAD MASSIMO DRIVE MASSIMO DRIVE MASSIMO DRIVE MASSIMO DRIVE PHELPS COURT MASSIMO DRIVE MASSIMO DRIVE PHELPS COURT MASSIMO DRIVE RIDGELAND DRIVE MASSIMO DRIVE MASSIMO DRIVE MASSIMO DRIVE JACKSON COURT JACKSON COURT JACKSON COURT PHELPS COURT PHELPS COURT OUAIL CIRCLE **OUAIL CIRCLE OUAIL CIRCLE OUAIL CIRCLE OUAIL CIRCLE** QUAIL CIRCLE OUAIL CIRCLE **OUAIL CIRCLE** QUAIL CIRCLE **OUAIL CIRCLE** QUAIL CIRCLE JACKSON COURT MASSIMO DRIVE JACKSON COURT JACKSON COURT MASSIMO DRIVE

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09-Sep-1(01-Jun-1(CT000S4:087604912728 18-Jan-1212-Oct-11CT00054-087604913540 19-Jan-1212-Oct-11CT00054:087604914408 21-Feb-1:18-Oct-11CT00054:087604914466 24-Aug-1(15-Feb-1(CT00054:087604914656 16-Nov-1 16-Aug-1 CT00054:087604915412 16-Nov-1 16-Aug-1 CT00054:087604915461 24-Aug-1 15-Feb-1 (CT00054:087604915624 18-Aug-1(10-Feb-1(CT00054:087604915680 17-Aug-1.30-Apr-1; CT00054:087604916261 17-Aug-1 30-Apr-1:CT00054:087604916267 15-Aug-1 30-Apr-1; CT00054:087604916317 09-Jul-12 29-Mar-1 CT00054:087604916342 29-Jul-10 15-Feb-1(CT00054:087604916558 18-Aug-1(15-Feb-1(CT00054:087604917514 11-Aug-1(10-Feb-1(CT00054:087604917581 29-Sep-1(29-Jul-10 CT00059/087604917819 11-Jun-1(05-Mar-1 087604917884 14-Sep-1(01-Jun-1(CT00054:087604918252 28-Jun-1(24-Mar-1 CT00054:087604918410 28-lun-1(24-Mar-1 CT00054-087604918494 23-Mar-1 08-Dec-1 CT00054:087604919242 26-Aug-1 27-May-1CT00054:087604919452 27-Nov-1 30-lun-17 00:00:00 087604919791 08-Dec-1 05-Jul-17 CT00002(087604920571 14-Dec-1 05-Jul-17 CT00002(087604920571 14-Dec-1 05-Jul-17 CT00002(087604920571 18-Dec-1:05-Jul-17 CT00002(087604920571 0S-Dec-1 0 5-Jul-17 CT00002(087604920571 05-Dec-1:0 S-Jul-17 CT00002(087604920571 19-Dec-13 00:00:00 CT000908087606486655 28-Jul-14 00:00:00 CT00090{087606486655 03-lun-16.00:00:00 CT00109-087606486655 03-lup-16.00:00:00 CT00109-087606486655 03-Jun-16 00:00:00 CT00109:087606486655 17-May-1600:00:0:CT00109:087606486655 31-Jan-11 00:00:00 CT00013:087607592727 04-Mar-11 00:00:0(CT00013: 087607592727 19-Jul-11 00:00:00 CT000318087607592727 11-Sep-12 00:00:0C CT00013: 087607592727 05-Feb-13 00:00:0C CT00060(087607592727 29-Apr-15 00:00:00 CT00013; 087607592727 30-Nov-16 00:00:00 087607592727 10-Apr-17 00:00:00 CT00109 087607592727 10-Apr-17 00:00:00 CT00109: 087607592727 07-Apr-1700:00:00CT00109:087607592727 30-May-17 00:00:0 CT00109: 087607592727 30-May-17 00:00:0 CT00109: 087607592727 07-Apr-17 00:00:00 CT00109: 087607592727 14-Jun-17 00:00:00 CT00109: 087607592727 17-Jul-17 00:00:00 CT00109:087607592727 12-Apr-17 00:00:00 CT00109: 087607592727 17-Feb-10 00:00:0C 087607595256 12-Jul-10 00:00:00 CT00013:087607595256 13-Oct-10 00:00:00 CT00013:087607595256 24-Feb-11 00:00:00 087607595256 07-Dec-12 00:00:00 CT00014(087607595256 10-Jun-14 00:00:00 087607595256 30-Nov-15 00:00:0(CT00014(087607595256

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BD00708 PR13442 U2013-0602	26-Jun-1:26-Jun-1:Contractor	NEW HOUSE
BD00609 PR12011(U2011-0666	07-Sep-1:07-Sep-1: Contractor	NEW HOUSE
BD01007: PR10780(U2017-0580	19-May-119-May-1 Contractor	MODULAR HOME
BD00523: PR13238; U2010-0298	12-Apr-1(12-Apr-1(Contractor	NEW HOUSE
BD00870 PR13593, U2015-1402	30-Dec-1:30-Dec-1: Contractor	MOBILE HOME
BD00708: PR13442: U2013-0603	26-Jun-1:26-Jun-1:Contractor	NEW HOUSE
BD00953 PR13639 U2016-1395	01-Nov-1 01-Nov-1 Contractor	NEW HOUSE
BD00892 PR13609: U2016-0405	31-Mar-1 31-Mar-1 Contractor	NEW HOUSE
BD00674-PR13402:U2012-0989	03-Dec-1:03-Dec-1:Owner	MOBILE HOME
BD00973 PR13648 U2017-0085	25-Jan-1725-Jan-17Owner	MOBILE HOME
BD00845: PR13576! U2015-0973	04-Sep-1:04-Sep-1:Other	MOBILE HOME
BD00893 PR13610(U2016-0418	04-Apr-1(04-Apr-1(Contractor	
BD00764 PR13507; U2014-0553	04-Jun-1/04-Jun-1/Contractor	
BD00713 PR13436 U2013-0701	19-Jul-13 19-Jul-13 Contractor	
BD00456 PR13173{U2009-0402	08-Jun-0508-Jun-05Contractor	
BD00736-PR13473(U2013-1191	03-Dec-1.03-Dec-1. Contractor	
BD01005: PR13663{ U2017-0543	09-May-109-May-1 Contractor	
BD01014: PR13667(U2017-0686	16-Jun-1716-Jun-17Contractor	
BD01028 PR13674! U2017-0898	07-Aug-1 07-Aug-1 Contractor	NEW HOUSE
BD00954 PR13640: U2016-1426	04-Nov-1 04-Nov-1 Contractor	
BD00953: PR136394 U2016-1394	01-Nov-1 01-Nov-1 Contractor	
BD00997, PR13660: U2017-0425	17-Apr-1;17-Apr-1;Contractor	
BD01014 PR13667 U2017-0687	16-Jun-1716-Jun-17Contractor	
BD00962; PR13643; U2016-1543	06-Dec-1:06-Dec-1:Contractor	
BD00736:PR13474(U2013-1192	03-Dec-1:03-Dec-1. Contractor	
BD00953: PR13639; U2016-1393	01-Nov-1 01-Nov-1 Contractor	
BD00992 PR136584 U2017-0367	28-Mar-1 28-Mar-1 Contractor	
BD00889 PR13606 U2016-0352	18-Mar-1 18-Mar-1 Contractor	
BD00962: PR13643: U2016-1544	06-Dec-1:06-Dec-1:Contractor	
BD00762:PR13506/U2014-0525	23-May-123-May-1Contractor	
BD00739: PR13451: U2014-0041	14-Jan-1414Jan-14Contractor	
BD00741 PR134508 U2014-0082	27-Jan-1427-Jan-14Contractor	
BD00962 PR136434 U2016-1545	06-Dec-1(06-Dec-1)Contractor	
BD00828 PR13562 (U2015-0599	15-Jun-1515-Jun-15Contractor	
BD00828 PR13562(U2015-0602	15-Jun-1515-Jun-15Contractor	
BD00828 PR13562{ U2015-0601	15-Jun-15 15-Jun-15 Contractor	
BD01028 PR13673 U2017-0893	03-Aug-1 03-Aug-1 Contractor	
BD00953 PR13639: U2016-1392 BD00828 PR13562: U2015-0600	01-Nov-1 01-Nov-1 Contractor	
BD00828 PR13562 .02013-0600 BD00975 PR13649 .02017-0114	15-Jun-1515-Jun-15Contractor	
	01-Feb-1:01-Feb-1:Contractor 29-Mar-1 29-Mar-1 Contractor	
BD00582: PR13303: U2011-0202 BD00934: PR13631(U2016-1063	23-Aug-1:23-Aug-1:Contractor	
BD00934; PR13831(02018-1083 BD00674; PR13403; U2012-0994	04-Dec-1:04-Dec-1:Contractor	
BD000777; PR13520(U2014-0836	19-Aug-1/19-Aug-1/Contractor	
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BD01000 PR13661(U2017-0460	25-Apr-1: 25-Apr-1; Contractor	
BD00498 PR13213 U2009-0972	10-Dec-0: 10-Dec-0! Contractor	
BD00748: PR13491: U2014-0266	24-Mar-124-Mar-1 Contractor	
BD00662 PR133884U2012-0731	06-Sep-1;06-Sep-1;Contractor	
BD00615: PR13338: U2011-0796	24-Oct-1:24-Oct-1:Contractor	
BD00615 PR13338 U2011-0795	24-Oct-1:24-Oct-1:Contractor	
BD00500 PR13215: U2009-0995	18-Dec-0! 18-Dec-0! Contractor	NEW HOUSE
BD00742 PR13451: U2014-0110	05-Feb-1:05-Feb-1:Contractor	NEW HOUSE
BD00516 PR13232! U2010-0217	12-Mar-1 12-Mar-1 Contractor	NEW HOUSE
BD00674:PR13403(U2012-0996	04-Dec-1:04-Dec-1:Contractor	NEW HOUSE
BD00727 PR13464 U2013-1004	15-Oct-1: 15-Oct-1: Contractor	NEW HOUSE
BD00747 PR13490; U2014-0251	19-Mar-119-Mar-1 Contractor	NEW HOUSE
BD00827 PR13562 U2015-0598	15-Jun-1515-Jun-15Contractor	NEW HOUSE

06-Dec-1:27-Jun-1:CT00002;182400121237 12-Jan-1206-Sep-1: CT00040:087717102687 07-Aug-1 16-May-1 CT00163(087717212201 27-Oct-1(09-Apr-1(087718403745 26-Jan-16 00:00:00 CT00013{087800222072 06-Dec-1:27-Jun-1:CT00002;182400121237 16-Jun-1724-Oct-1(CT00159:087800549887 06-Oct-1f 30-Mar-1 CT00159 087800640906 19-Dec-1300:00:00CT000138087800739175 12-Jan-18 00:00:00 087800739175 21-Jan-16 00:00:00 CT00013, 087801073062 27-Oct-1(04-Apr-1(CT00159)087802557041 06-May-127-May-1CT00053-087802557997 07-Nov-1 19-Jul-13 CT00002, 182400121237 07-Jan-1103-Jun-05 087802558777 2 0-Jun-1402-Dec-1: CT000532087802559793 04-Jun-18 10-May-1 CT001599 087802567035 27-Feb-1/13-Jun-17CT001599087802567146 27-Feb-1(07-Aug-1 CT00159(087802568253 31-May-103-Nov-1 CT001599087802650053 14-Jun-1724-Oct-1(CT00159(087802650190 10-Jan-1E11-Apr-1:CT00159:087802650315 25-Apr-1(13-Jun-17CT00159)087802650488 20-Jun-1705-Dec-1(CT00159:087802650597 02-Sep-1/02-Dec-1: CT00053: 087802650777 14-Jun-1724-Oct-1(CT00159\087802651136 20-Dec-1 28-Mar-1 CT001599087802651136 31-Oct-1(18-Mar-1CT00159)087802651283 08-Dec-1 05-Dec-1(CT00159) 087802651655 04-Jun-1520-May-1CT00053:087802651816 07-May-113-Jan-14CT00002;182400121237 07-May-124-Jan-14CT00002;182400121237 27-Oct-1,05-Dec-1(CT001599087802652330 26-Feb-1(15-Jun-15CT00159)087802652711 21-Jan-1€15-Jun-15CT001595087802653532 21-Jan-1€ 15-Jun-15 CT001595 087802653579 30-Apr-1{25-Jul-17 CT001595087802653804 04-Oct-1724-Oct-1f CT001595087802653951 11-Feb-1(15-Jun-15CT00159(087802654617 24-Aug-1 01-Feb-1 CT001599087802660249 11-Aug-1 24-Mar-1 CT000532087802661202 02-May-122-Aug-1 CT00159 087802661520 19-Jun-1303-Dec-1: CT00117(087802662421 04-Jun-1515-Aug-1-CT00053-087802663257 19-Jun-1203-Dec-1.CT00117(087802663409 18-Jun-1/15-Oct-1: CT00117(087802663574 26-Jan-1821-Apr-1: CT001599087802664303 21-Apr-1(07-Dec-0 087802664376 19-Jun-1424-Mar-1 CT000532087802665108 03-Dec-1:06-Sep-1:CT00053:087802665421 14-Mar-1 24-Oct-11 CT00053 (087802665482 14-Mar-1 24-Oct-11CT00053;087802665622 20-Sep-1(18-Dec-0: CT00053: 087802666277 30-Jun-1/04-Feb-1/CT000027182400121237 17-Mar111-Mar-1CT00048(087802667340 19-Jun-1204-Dec-1: CT00053: 087802667446 05-Feb-1:15-Oct-1:CT00053;087802668332 06-Mar-118-Mar-1CT00117(087802668665 16-Mar-1 15-Jun-15 CT00159 087802669145

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BLUEBELL LANE	
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BD00854 PR13582: U2015-1144 15-Oct-1: 15-Oct-1: Contractor NEW HOUSE BD00456 PR13173(U2009-0403 08-Jun-0508-Jun-05Contractor NEW HOUSE BD00852 PR13581: U2015-1102 06-Oct-1: 06-Oct-1: Contractor NEW HOUSE BD00934'PR13631'U2016-1064 23-Aug-1(23-Aug-1)Contractor NEW HOUSE BD00737/PR13475(U2013-1228 16-Dec-1:16-Dec-1: Contractor NEW HOUSE BD00868 PR13592 U2015-1374 16-Dec-1 16-Dec-1 Contractor NEW HOUSE BD00571 PR13290(U2011-0027 18-Jan-1118-Jan-11Contractor NEW HOUSE BD00571 PR13291(U2011-0033 20-Jan-1120-Jan-11Contractor NEW HOUSE BD00826 PR13553! U2015-0572 08-Jun-1508-Jun-15Contractor NEW HOUSE BD00584 PR13302{U2011-0232 08-Apr-1:08-Apr-1:Contractor NEW HOUSE BD00657 PR13380(U2012-0624 03-Aug-1:03-Aug-1 Contractor NEW HOUSE BD00762 PR13493 U2014-0519 20-May-120-May-1 Contractor NEW HOUSE BD00659 PR13383 U2012-0666 16-Aug-1 16-Aug-1 Contractor NEW HOUSE BD00835 PR13563 U2015-0781 24-Jul-15 24-Jul-15 Contractor NEW HOUSE BD00721(PR13435; U2013-0865 03-Sep-1; 03-Sep-1; Contractor NEW HOUSE BD00789 PR13525! U2014-1083 22-Oct-1/ 22-Oct-1/ Contractor NEW HOUSE BD00789.PR13525(U2014-1084 22-Oct-1/22-Oct-1/Contractor NEW HOUSE BD00609 PR13330 U2011-0667 07-Sep-1: 07-Sep-1: Contractor NEW HOUSE BD00500/PR13214(U2009-1010 23-Dec-0!23-Dec-0!Contractor NEW HOUSE BD00801: PR13536: U2015-0047 20-Jan-152 0-Jan-15 Contractor NEW HOUSE BD00527/PR13241: U2010-0358 28-Apr-1(28-Apr-1(Contractor NEW HOUSE BD00628 PR13351:U2012-0067 27-Jan-1227-Jan-12Contractor NEW HOUSE BD00639 PR13363 U2012-0284 12-Apr-1;12-Apr-1; Contractor NEW HOUSE BD00715(PR13439(U2013-0743 29-Jul-13 29-Jul-13 Contractor NEW HOUSE BD00811 PR13544(U2015-0283 25-Mar-1 25-Mar-1 Contractor NEW HOUSE BD00821-PR13556:U2015-0496 20-May-120-May-1Contractor NEW HOUSE BD00720:PR13437;U2013-0864 03-Sep-1:03-Sep-1: Contractor NEW HOUSE BD00932 PR13628 U2016-1031 17-Aug-1 17-Aug-1 Contractor NEW HOUSE BD00589: PR13303{U2011-0307 06-May-106-May-1Contractor NEW HOUSE BD00572 PR13260(U2011-0050 27-Jan-1127-Jan-11Contractor NEW HOUSE BD00754 PR13499{ U2014-0381 22-Apr-1/22-Apr-1/Contractor NEW HOUSE BD00646 PR13369 U2012-0415 29-May-129-May-1 Owner MOBILE HOME BD00498 PR13213(U2009-0971 10-Dec-0: 10-Dec-0: Contractor NEW HOUSE BD00509/PR13224(U2010-0120 12-Feb-1(12-Feb-1(Contractor NEW HOUSE BD01026 PR13653 U2017-0858 21-Jul-17 21-Jul-17 Contractor NEW HOUSE BD00553 PR12042(U2005-0600 23-Sep-1(13-Jun-05Owner NEW HOUSE BD00896 PR13611 U2016-0476 15-Apr-1(15-Apr-1(Owner MOBILE HOME BD00630 PR13351(U2012-0103 14-Feb-1:14-Feb-1:Owner MOBILE HOME BD00666 PR13393(U2012-0821 03-Oct-1203-Oct-12Contractor NEW HOUSE BD00950 PR13628(U2016-1340 18-Oct-1(18-Oct-1(Contractor NEW HOUSE BD00707 PR134418U2013-0597 26-Jun-1226-Jun-12Contractor NEW HOUSE BD00834 PR13566: U2015-0759 20-Jul-15 20-Jul-15 Owner NEW HOUSE BD00786 PR13433 U2014-1026 08-Oct-1408-Oct-14 Owner MOBILE HOME BD00799 PR13538 U2015-0009 05-Jan-1505-Jan-150wner MOBILE HOME BD00809 PR13546(U2015-0255 20-Mar-1 20-Mar-1 Other MOBILE HOME BD00544/PR13259(U2010-0619 21-Jul-10 21-Jul-10 Contractor MULTIPLE FAMILY DWLS BD00648 PR13373 U2012-0449 08-Jun-1208-Jun-120wner MOBILE HOME BD00677(PR13408)U2012-1058 21-Dec-1, 21-Dec-1, Other MOBILE HOME BD00562 PR13280{ U2010-0956 02-Nov-1 02-Nov-1 Contractor NEW HOUSE BD00594'PR13316'U2011-0377 27-May-127-May-1Contractor NEW HOUSE BD00574 PR13294 U2011-0075 11-Feb-1 11-Feb-1 Contractor NEW HOUSE BD00588 PR13310 U2011-0293 03-May-103-May-1 Contractor MODULAR HOME BD00553 PR13271/U2010-0811 17-Sep-1(17-Sep-1(Contractor NEW HOUSE BD00608: PR13331; U2011-0660 01-Sep-1: 01-Sep-1: Contractor NEW HOUSE BD00566 PR13285!U2010-1041 02-Dec-1(02-Dec-1)Contractor NEW HOUSE BD00599 PR13322/U2011-0476 28-Jun-1128-Jun-11Contractor NEW HOUSE BD00564 PR13282 U2010-0994 15-Nov-1 15-Nov-1 Contractor NEW HOUSE BD00985 PR13656 U2017-0282 06-Mar-106-Mar-1 Owner MODULAR HOME BD00785'PR13525{U2014-1017 08-Oct-1/08-Oct-1/Contractor NEW HOUSE

27-Apr-1(15-Oct-1:CT00159)087802669314 28-Oct-1(03-Jun-05 087802669514 27-Apr-1(05-Oct-1:CT00159(087802760147 13-Jun-1722-Aug-1 CT00159 087802760306 30-Apr-1:16-Dec-1.CT00093:087900201261 23-May-123-Nov-1 CT00053:087900218264 17-Jun-1114-Jan-11CT000515087900219447 11-May-120-Jan-11CT00054-087900219447 22-Oct-1505-Jun-15CT000545087900224333 06-Dec-1:07-Apr-1: CT00051:087900238736 29-Jan-1331-Jul-12 CT000931087900242946 23-Feb-1: 19-May-1CT00003(087900247732 23-Dec-1:14-Aug-1:CT00093:087900248406 21-Dec-1:24-Jun-1: CT00053: 087900249735 12-Mar-1 30-Aug-1 CT00003(087900328115 12-May-109-Oct-1/CT00003,087900330795 04-Jun-1:09-Oct-1/CT00003:087900333642 25-Jan-1229-Aug-1 CT00093:087900334724 08-Jun-1(21-Dec-0:CT00051:087900336126 20-May-108-Jan-15CT00053-087900340457 07-Dec-1(26-Apr-1(087900341283 14-Jun-1; 27-Jan-12 CT00093; 087900341724 29-Jan-1312-Apr-12CT000931087900342444 29-Aug-1/29-Jul-13 CT00030:087900343081 02-Dec-1:25-Mar-1 CT00053:087900343591 14-Jul-16 20-May-1CT00041:087900343746 22-Aug-1-28-Aug-1.CT00003(087900427110 27-Feb-1 17-Aug-1 CT00174{087900510817 23-Nov-1 06-May-1CT000028087900693765 09-Dec-1:21-Jan-11 CT00077:087920810082 25-Sep-1/17-Apr-1/CT00002,182400121237 02-Jul-12 00:00:00 CT001055088401182472 11-May-109-Dec-0! 088401376786 19-Aug-1:05-Feb-1(CT00002(088401376786 16-May-119-Jul-17 CT00042:088401497504 10-Sep-13 00:00:00 088402870603 23-Jun-16 00:00:00 CT00077;088501272929 29-Mar-12 00:00:0(CT00013:088501273011 07-Mar-102-Oct-12CT00098(088501285671 01-Jun-1714-Oct-1(CT000227088501380367 14-May-126-Jun-1: CT00127: 088501384315 25-Apr-1(16-Jul-15 CT00077,088502550814 12-Jun-15 00:00:00 CT00077:088503107625 18-Mar-1S 00:00:0(CT00138: 088503424502 30-Mar-15 00:00:0(CT00071/ 088503424502 09-Mar-120-Jul-10 CT000665088601289810 02-lul-12 00:00:00 CT00013(088601480320 09-Jan-13 00:00:00 CT00074 088601480320 03-Jun-1126-Oct-1(CT00002: 088601491769 26-Aug-1 27-May-1CT00054-088603010176 24-May-111-Feb-1: CT00054: 088603010430 14-Jul-11 28-Apr-1: CT000594 088603010666 05-Jan-1116-Sep-1(CT00054:088603011142 13-Dec-1 01-Sep-1 CT00054 088603011307 14-Jul-11 02-Dec-1(CT00054;088603011363 27-Sep-1: 28-Jun-11CT00054: 088603012019 10-Mar-1 10-Nov-1 CT00054: 088603012330 30-Jun-1703-Mar-1 CT000777 088603012518 24-Jun-1507-Oct-1/CT00019;088603012883

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WILD BRIAR LANE	
BUGGY LANE BUGGY LANE	
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RIVER VIEW CIRCLE	
SADDLE RIDGE ROAD	
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SADDLE RIDGE ROAD	
SADDLE RIDGE RD	
RANGE ROAD	
SAM'S WAY DRIVE	
BLUEBELL LANE	
NORTHSIDE ROAD	
CASH RD	
CASH RD	
CASH ROAD	
DUTCHVILLE DR	
HIGHWAY 15	
SHEKINAH LANE	
ZEBE LANE	
ZEBE LN	
ZEBE LANE	
NORTHSIDE RD	
NORTHSIDE ROAD	
CROSS LANE	
CROSS LANE	
MILL STREAM CIRCLE	
BIRCH DRIVE	
BIRCH DRIVE	
HIGHWAY 56	
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BD00581: PR13301: U2011-0186	21-Mar-1 21-Mar-1 Contractor	NEW HOUSE
BD00553: PR13271: U2010-0810	17-Sep-1(17-Sep-1(Contractor	NEW HOUSE
BD00754;PR13499;U2014-0382	22-Apr-1-22-Apr-1-Contractor	
BD00729: PR13466(U2013-1028	18-Oct-1: 18-Oct-1: Contractor	
BD00730.PR134675U2013-1057	24-Oct-1:24-Oct-1:Contractor	
BD00733 PR13471 U2013-1127	14-Nov-1 14-Nov-1 Contractor	
BD00703 PR13439(U2013-0522	11-Jun-1311-Jun-13 Contractor	
BD00736: PR13474(U2013-1204	06-Dec-1.06-Dec-1. Contractor	
BD00744: PR134848 U2014-0171	25-Feb-1:25-Feb-1:Contractor	
BD00686 PR13418 U2013-0210	05-Mar-105-Mar-1 Contractor	
BD00661 PR13387; U2012-0717	04-Sep-1:04-Sep-1:Contractor	
BD00681' PR13413, U2013-0114	05-Feb-1:05-Feb-1:Contractor 04-Feb-1:04-Feb-1:Contractor	
BD00742: PR13481: U2014-0101 BD00680 PR13411{ U2013-0079	24-Jan-1324-Jan-13Contractor	
BD00626:PR13349'U2012-0035	17-Jan-1217-Jan-12Contractor	
BD00630 PR13354; U2012-0110	15-Feb-1: 15-Feb-1: Contractor	
BD00679:PR13411:U2013-0053	16-Jan-1216-Jan-12Contractor	
BD00684 PR13415 U2013-0151	15-Feb-1: 15-Feb-1: Contractor	
BD00673: PR13402(U2012-0971	29-Nov-1 29-Nov-1 Contractor	
BD00642:PR13366;U2012-0340	26-Apr-1:26-Apr-1: Contractor	
BD00626-PR13349{U2012-0034	17-Jan-1217-Jan-12Contractor	
BD00767 PR13510(U2014-0617	26-Jun-1426-Jun-14 Contractor	
BD00665' PR13392(U2012-0803	26-Sep-1, 26-Sep-1, Contractor	
BD00668 PR13395(U2012-0859	17-Oct-1217-Oct-12Contractor	
BD00454 PR13172(U2009-0382	0 1-Jun-0901-Jun-09 Contractor	
BD00560: PR13278, U2010-0924	19-Oct-1(19-Oct-1(Contractor	
BD00511 PR13227(U2010-0136	17-Feb-1(17-Feb-1(Contractor	NEW HOUSE
BD00560 PR13278 U2010-0922	19-Oct-1(19-Oct-1(Contractor	NEW HOUSE
BD00680 PR13412 U2013-0085	28-Jan-1328-Jan-13 Contractor	NEW HOUSE
BD00663: PR13389; U2012-0754	13-Sep-1:13-Sep-1:Contractor	NEW HOUSE
BD00662 PR13388: U2012-0730	06-Sep-1;06-Sep-1; Contractor	NEW HOUSE
BD00685: PR13416{ U2013-0187	26-Feb-1:26-Feb-1: Contractor	
BD00498: PR13214: U2009-0979	16-Dec-0! 16-Dec-0! Contractor	
BD00695(PR13428(U2013-0361	25-Apr-1: 25-Apr-1: Contractor	
BD00708 PR13444: U2013-0615	27-Jun-1227-Jun-12Contractor	
BD00925 PR13585 U2016-0933	26-Jul-16 26-Jul-16 Contractor	
BD00925: PR13585: U2016-0935	26-Jul-16 26-Jul-16 Contractor	
BD00925:PR13585(U2016-0934	26-Jul-16 26-Jul-16 Contractor	
BD00467 PR13184:U2009-0550	23-Jul-09 23-Jul-09 Contractor	
BD00418 PR13140(U2008-0988	21-Nov-0 21-Nov-0 Contractor	
BD00764:PR13496(U2014-0554 BD00709:PR13444(U2013-0624	04-Jun-1/04-Jun-1/Contractor	
BD00790 PR13531 U2014-1129	28-Jun-1: 28-Jun-1: Contractor 04-Nov-1:04-Nov-1 Contractor	
BD00460 PR13177 U2009-0461	23-Jun-0§ 23-Jun-0§ Contractor	
BD00480(PR13177702005-0401 BD00924(PR13584(U2016-0928	26-Jul-16 26-Jul-16 Contractor	
BD00925: PR13585: U2016-0932	26-Jul-16 26-Jul-16 Contractor	
BD00926(PR13586;U2016-0939	26-Jul-16 26-Jul-16 Contractor	
BD00925(PR13585; U2016-0929	26-Jul-16 26-Jul-16 Contractor	
BD00925 PR13585;U2016-0930	26-Jui-16 26-Jul-16 Contractor	
BD00925 PR13585 U2016-0931	26-Jul-16 26-Jul-16 Contractor	
BD00925 PR13586(U2016-0938	26-Jul-16 26-Jul-16 Contractor	
BD00925:PR13S85:U2016-0937	26-Jul-16 26-Jul-16 Contractor	
BD00925 PR13585{U2016-0936	26-Jui-16 26-Jui-16 Contractor	
BD00891:PR13608;U2016-0386	28-Mar-128-Mar-1 Owner	MOBILE HOME
BD00962 PR13643: U2016-1536	0S-Dec-1(0S-Dec-1) Occupant	MOBILE HOME
BD00984: PR13655(U2017-0253	27-Feb-1:27-Feb-1: Owner	MOBILE HOME
BD007281 PR13455; U2013-1020	17-Oct-1: 17-Oct-1: Owner	NEW HOUSE
BD00584 PR13302 U2011-0225	05-Apr-1:05-Apr-1:Other	MOBILE HOME
BD00886 PR13604 U2016-0303	14-Mar-114-Mar-1 Contractor	NEW HOUSE

15-Jul-11 21-Mar-1 CT00054:088603013008 27-Jan-1116-Sep-1(CT00054:088603013185 22-Sep-1/17-Apr-1/CT000027182400121237 18-Dec-1:17-Oct-1:CT00133:088603110490 13-Mar-1 24-Oct-1: CT00002,088603114929 21-Mar-114-Nov-1 CT00002.088603122238 02-Oct-1:10-Jun-1:CT00002;088603122250 21-Mar-105-Dec-1: CT00002:088603123006 14-Oct-1424-Feb-14CT00002:088603123041 13-Jun-1228-Feb-12CT000027088603123304 03-Dec-1; 04-Sep-1; CT00002; 088603124269 22-May-105-Feb-1: CT000027088603124316 14-Oct-1/29-Jan-14CT00002;088603125044 16-May-123-Jan-13 CT00002, 088603125212 05-Jun-1211-Jan-12CT000027088603125285 05-Jun-1213-Feb-1; CT00002; 088603125385 22-Apr-1:15-Jan-13CT00002,088603126015 13-lup-1-15-Feb-1-CT00002-088603126077 06-Mar-128-Nov-1 CT00002,088603126255 02-Aug-1 26-Apr-1; CT00002; 088603126450 07-May-117-Jan-12CT000027088603127049 12-Jan-1525-Jun-14 CT000027088603127297 25-Jan-1326-Sep-1;CT00002;088603127442 17-Jan-1317-Oct-12CT000022088603128258 20-Jul-10.01-Jun-05 CT00002:088603129026 26-Apr-1: 18-Oct-1(CT00002;088603129073 20-Oct-1(17-Feb-1(CT00002; 088603129215 23-Feb-1: 18-Oct-1(CT000027088603129282 16-May-128-Jan-13CT00002:088603129282 17-Dec-1, 13-Sep-1; CT00002;088603129308 17-Dec-1:06-Sep-1: CT00002:088603129353 02-Apr-13 00:00:00 CT000817088603148458 13-Aug-1:15-Dec-0:CT00002;088603220485 14-Aug-1.25-Apr-1:CT000027088603221023 01-Nov-1 2 7-Jun-1: CT00002; 088603221161 17-Jan-1704-Nov-1 CT000027088603221987 28-Dec-1:04-Nov-1 CT000027088603221990 17-Jan-1704-Nov-1 CT00002,088603221994 02-Aug-1:21-Jul-09 CT00002;088603222225 08-Jul-10 21-Nov-0 CT00002,088603222379 08-Sep-1: 30-May-1CT00002, 182400121237 28-Feb-1/28-Jun-15CT000027088603223428 10-Feb-1!04-Nov-1 CT00002;088603225555 20-Jul-10 22-Jun-05 CT00002, 088603225653 24-Jan-1704-Nov-1 CT000027088603230178 28-Dec-1(04-Nov-1 CT000027088603231080 01-Mar-1 04-Nov-1 CT000027088603231086 24-Jan-1704-Nov-1 CT000027088603231200 31-Jan-1704-Nov-1 CT00002,088603231222 02-Feb-1'04-Nov-1 CT00002,088603231254 28-Feb-1:04-Nov-1 CT00002:088603232009 24-Feb-1:04-Nov-1 CT00002:088603232121 24-Feb-1:04-Nov-1 CT00002;088603232143 26-Jul-16 00:00:00 CT00077,088603241030 23-Feb-17 00:00:00 CT00171(088603241030 22-Mar-17 00:00:0(CT00133{ 088603241030 24-Oct-1/17-Oct-1: CT00077;088704837320 24-Jun-1100:00:00 CT00081:088704915241 28-Jul-16 14-Mar-1 CT00001,088801369964

HUNTER COURT
HUNTER COURT
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HARVEST COURT
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KENNETH STREET
APPLEWOOD DRIVE
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BROGDEN RD
BROGDEN RD
ORKNEY ROAD

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STEM NC 27581

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BD00554' PR13273: U2010-0838		NEW HOUSE	17-Mar-1 23-Sep-1(CT00001; 08880137835		ORKNEY RD	STEM NC 27581	Neuse
BD00886-PR13604(U2016-0302			28-Jul-16 14-Mar-1 CT00001,08880137904		ORKNEY ROAD	STEM NC 27581	Neuse .
	16-Dec-1-16-Dec-1-Contractor		30-Apr-1:26-Nov-1 CT00002;18240012123		BLUEBELL LANE	WAKE FOREST, NC 27587	Neuse
BD00886. PR13604: U2016-0301			28-Jui-16 11-Mar-1 CT00001;08880137912		ORKNEY ROAD	STEM NC 27581	Neuse
	02-Jul-12 02-Jul-12 Owner	NEW HOUSE	01-Oct-1;29-Jun-1;CT00001;08880145284		ORKNEY ROAD	STEM	Neuse
BD00805!PR13498{U2015-0168			25-Jun-1119-Feb-11CT00002718240012123		BLUEBELL LANE	WAKE FOREST, NC 27587	Neuse
	24-May-124-May-1Contractor		07-Nov-124-May-1CT00042:08880145778		TUMP WILKINS RD		Neuse
BD00751:PR13494(U2014-0321			25-Aug-1-07-Apr-14CT00001,08880146057		ORKNEY ROAD	STEM NC 27581	Neuse
BD00757 PR135014 U2014-0421			25-Sep-1:28-Apr-1:CT00001;08880146071	9 200	ORKNEY ROAD	STEM NC 27581	Neuse
BD00757 PR13501 U2014-0422			24-Oct-1428-Apr-14CT00001,08880146073	0 202	ORKNEY ROAD	STEM NC 27581	Neuse
BD00751 PR13494.U2014-0322	07-Apr-1407-Apr-14 Contractor	NEW HOUSE	29-Aug-1-07-Apr-1+CT00001-08880146140	7 208	ORKNEY ROAD	STEM NC 27581	Neuse
BD006S0;PR13377[U2012-0505	0 2-Jul-12 02-Jul-12 Owner	NEW HOUSE	01-Oct-1;29-Jun-1;CT00001;08880146203	1 220	ORKNEY ROAD	STEM	Neuse
BD00503: PR13220(U2010-0037	13-Jan-10 13-Jan-10 Contractor	NEW HOUSE	09-Jun-1(12-Jan-1(CT00001;08880146249	7 209	ORKNEY ROAD	STEM NC 27581	Neuse
BD00503 PR13220 U2010-0038	13-Jan-1013-Jan-10 Contractor	NEW HOUSE	22-Apr-1(12-Jan-1(CT00001; 08880146267	4 205	ORKNEY ROAD	STEM NC 27581	Neuse
BD00504 PR13220 U2010-0039	13-Jan-1013-Jan-10 Contractor	NEW HOUSE	30-Mar-112-Jan-10 CT00001,08880146275	3 203	ORKNEY ROAD	STEM NC 27581	Neuse
BD00504 PR13220:U2010-0040	13-Jan-1(13-Jan-1(Contractor	NEW HOUSE	21-Apr-1(12-Jan-1(CT00001,08880146288	5 202	EDINBURGH ST	STEM NC 27581	Neuse
BD00503 PR13219 U2010-0036	13-Jan-1(13-Jan-1(Contractor	NEW HOUSE	03-Jun-1(12-Jan-1(CT00001;08880146342		ORKNEY ROAD	STEM NC 27581	Neuse
BD00S04 PR13220 U2010-0041			19-Apr-1(12-Jan-1(CT00001,08880146384		EDINBURGH ST	STEM NC 27581	Neuse
BD00805 PR13499(U2015-0169			25-Jun-1519-Feb-11CT00002718240012123		BLUEBELL LANE	WAKE FOREST, NC 27587	Neuse
BD00786 PR13526 U2014-1022			07-Jul-15 08-Oct-1/ CT00001,08880146436		KINLOSS WAY	STEM NC 27581	Neuse
	08-Oct-1408-Oct-14 Contractor		29-Jul-15 08-Oct-1/CT00001,08880146443		KINLOSS WAY	STEM NC 27581	Neuse
BD00786(PR13526:U2014-1025			07-Jul-15 08-Oct-14 CT00001, 08880146510		ABERDEEN STREET	STEM NC 27581	Neuse
BD00816: PR13554(U2015-0392			24-Sep-1!22-Apr-1!CT00001;08880146581		EDINBURGH STREET		120000000000000000000000000000000000000
BD00503 PR13219 U2010-0035			29-Mar-1 12-Jan-1(CT00001)08880146637		KINLOSSWAY	STEM NC 27581	Neuse
BD00816 PR13554 U2015-0393			22-Sep-1! 22-Apr-1! CT00001;0888014668 1			STEM NC 27581	Neuse
	07-Apr-1/07-Apr-1/Owner	NEW HOUSE	26-Aug-1/07-Apr-1/ CT00001, 08880146081		EDINBURGH STREET KINLOSS WAY	STEM NC 27581	Neuse
BD00503:PR13219.U2010-0034			29-Mar-1 12-Jan-1(CT00001, 08880146721		KINLOSS WAY	STEM NC 27581	Neuse
BD00757:PR13501(U2014-0423			27-Aug-1, 28-Apr-1 (CT00001, 08880146721 27-Aug-1, 28-Apr-1 (CT00001, 08880146812			STEM NC 27581	Neuse
BD00755 PR13273 U2010-0840		NEW HOUSE	2		KINLOSS WAY	STEM NC 27581	Neuse
			10-Mar-1 23-Sep-1(CT00001;08880147027		ORKNEY RD	STEM NC 27581	Neuse
BD00504 PR13220! U2010-0042 BD00707 PR13443' U2013-0594	26-Jun-1: 26-Jun-1: Contractor		19-Apr-1(12-Jan-1(CT00001:08880147102		ORKNEYROAD	STEM NC 27581	Neuse
			01-Apr-1/25-Jun-12CT00001708880147206		DUNDEE PLACE	STEM NC 27581	Neuse
BD00707 PR134434U2013-0593			07-Apr-1/25-Jun-12CT00001:08880147214		DUNDEE PLACE	STEM NC 27581	Neuse
BD00707 PR13443: U2013-0592			31-Jan-1425-Jun-12CT00001708880147220		DUNDEE PLACE	STEM NC 27581	Neuse
BD00705: PR13442{U2013-0577			21-Oct-1:21-Jun-1:CT00001:08880147232		DUNDEE PLACE	STEM NC 27581	Neuse
	22-Aug-1.22-Aug-1 Contractor		17-Apr-1422-Aug-1100002418240025609		BLUEBELL LANE	WAKE FOREST, NC 27587	Neuse
	24-Jun-1:24-Jun-1: Contractor		21-Oct-1:21-Jun-1:CT00001;08880147417		DUNDEE PLACE	STEM NC 27581	Neuse
BD00707 PR13443; U2013-0591			03-Feb-1: 25-Jun-12CT00001;08880147437		DUNDEE PLACE	STEM NC 27581	Neuse
BD00817 PR13554 U2015-0394			22-Sep-1!22-Apr-1! CT00001;08880147515		E DINBURGH STREET	STEM NC 27581	Neuse
BD00757 PR13501{U2014-0425			04-Nov-1 28-Apr-1 CT00001, 08880256167		GLASGOW STREET	STEM NC 27581	Neuse
BD00751 PR13494 U2014-0324	07-Apr-1407-Apr-14Contractor	NEW HOUSE	24-Oct-1/07-Apr-1/CT00001,08880256169	1 113	GLASGOW STREET	STEM NC 27581	Neuse
BD00817 PR13554 U2015-0395	22-Apr-1! 22-Apr-1! Contractor	NEW HOUSE	02-Sep-1!22-Apr-1!CT00001;08880256195	6 121	GLASGOW STREET	STEM NC 27581	Neuse
BD00823 PR13560(U2015-0518	26-May-126-May-1Contractor	NEW HOUSE	09-Mar-126-May-1CT00053:08880256235	7 107	GLASGOW STREET	STEM NC 27581	Neuse
BD00914; PR13621; U2016-0761	16-Jun-1f 16-Jun-1f Contractor	NEW HOUSE	26-Oct-1f 15-Jun-1f CT00053108880256243	5 109	GLASGOW STREET	STEM NC 27581	Neuse
BD00752: PR13495(U2014-0325	07-Apr-1/07-Apr-1/ Contractor	NEW HOUSE	24-Oct-1/07-Apr-1/CT00001,08880256251	3 111	GLASGOW STREET	STEM NC 27581	Neuse
BD00752:PR13495;U2014-0327	07-Apr-1/07-Apr-1/Contractor	NEW HOUSE	10-Sep-1/07-Apr-1/CT00001,08880256458	8 112	GLASGOW STREET	STEM NC 27581	Neuse
BD00757; PR13501(U2014-0426	29-Apr-1/29-Apr-1/Contractor	NEW HOUSE	04-Nov-1 28-Apr-1/ CT00001,08880256466		GLASGOW STREET	STEM NC 27581	Neuse
BD00836;PR13569(U2015-0807	28_Jul-15 28-Jul-15 Contractor	NEW HOUSE	19-Jan-1€ 28-Jul-15 CT00001,08880256474		GLASGOW STREET	STEM NC 27581	Neuse
BD00836' PR13569, U2015-0808	28-Jul-15 28-Jul-15 Contractor	NEW HOUSE	25-Feb-1(28-Jul-15 CT00001;08880256482		GLASGOW STREET	STEM NC 27581	Neuse
BD00837(PR13569(U2015-0809	28-Jul-15 28-Jul-15 Contractor	NEW HOUSE	26-Feb-1(28-Jul-15 CT00001;08880256490		GLASGOW STREET	STEM NC 27581	Neuse
	05-Feb-1!05-Feb-1!Contractor		03-Jun-1505-Feb-11CT00001508880256541		GLASGOW STREET	STEM NC 27581	Neuse
	07-Apr-1/07-Apr-1/Contractor		25-Sep-1(07-Apr-1(CT00001,08880256550		GLASGOW STREET	STEM NC 27581	Neuse
	14-Mar-1 14-Mar-1 Contractor		28-Sep-1(14-Mar-1 CT00001,08880256558		WICK ROAD	STEM NC 27581	Neuse
BD00887; PR13606; U2016-0316			29-Sep-1(15-Mar-1 CT00001,08880256584		WICK ROAD		
	28-Jul-15 28-Jul-15 Contractor		26-Feb-1(28-Jul-15 CT00001708880256591		WICK ROAD	STEM NC 27581	Neuse
	11-Sep-0! 11-Sep-0! Contractor		15-Feb-1(10-Sep-0(CT00021:08880256558		WICK ROAD	STEM NC 27581	Neuse
	14-Mar-114-Mar-1Contractor					STEM NC 27581	Neuse
	14-Mar-1 14-Mar-1 Contractor		23-Sep-1(15-Mar-1 CT00001;08880256664		WICK ROAD	STEM NC 27581	Neuse
	12-Apr-1(12-Apr-1(Contractor		28-Sep-1(11-Mar-1 CT00001;08880256671		WICK ROAD	STEM NC 27581	Neuse
			23-Jun-1(12-Apr-1(08880256741		WICK ROAD	STEM NC 27581	Neuse
BD00886: PR13604{U2016-0306	14-INIGL-1 14-INIGL-1 COULLECTOL	INE W HOUSE	26-Aug-1, 15-Mar-1 CT00001, 08880256784	4 401	ANGUS PLACE	STEM NC 27581	Neuse

BD00912 PR13620 U2016-0733	09-Jun-1f 09-Jun-1f Contractor	NEW HOUSE	
BD00937 PR13631{U2016-1093	29-Aug-1 29-Aug-1 Contractor	NEW HOUSE	
BD00914 PR136218U2016-0762	16-Jun-1f16-Jun-1fContractor	NEW HOUSE	1
BD00887 PR13606; U2016-0315	15-Mar-115-Mar-1Contractor		
BD00515 PR13231 U2010-0196	10-Mar-110-Mar-1 Contractor	NEW HOUSE	
BD007S7(PR13501)U2014-0424	29-Apr-1/29-Apr-1/Contractor		1
BD00519(PR1323S: U2010-0253	24-Mar-124-Mar-1Contractor		
BD00836 PR13569! U2015-0806	28-Jui-15 28-Jul-15 Contractor		
BD00836: PR13569/ U2015-0805	28-Jui-15 28-Jul-15 Contractor		
BD00836: PR13569: U2015-0804	28-Jui-15 28-Jul-15 Contractor		
BD00836-PR13569;U2015-0803	28-Jui-15 28-Jui-15 Contractor		
BD00886 PR13605(U2016-0307	14-Mar-114-Mar-1 Contractor		
BD00886 PR13603(U2016-0299	14-Mar-114-Mar-1Contractor		
BD00912: PR136202 U2016-0732	09-Jun-1609-Jun-16Contractor		1
BD00912 PR13620 U2016-0731	09-Jun-1609-Jun-16Contractor		
BD00903:PR13615:U2016-0592	05-May-105-May-1Contractor		1
BD00903 PR13615(U2016-0591	05-May-105-May-1 Contractor		1
BD00903: PR13615! U2016-0590	05-May-105-May-1Contractor		
BD01030 PR13675: U2017-0926	15-Aug-1 15-Aug-1 Contractor		1
BD00922: PR136265U2016-0899	19-Jul-16 19-Jul-16 Contractor		
BD00903: PR13615/ U2016-0589	05-May-105-May-1Contractor		
BD00713 PR13449(U2013-0710	23-Jul-13 23-Jul-13 Contractor		
BD00922, PR13626: U2016-0897	19-Jul-16 19-Jul-16 Contractor		
BD00937 PR13632(U2016-1094	29-Aug-1: 29-Aug-1: Contractor		
BD00922: PR136264 U2016-0898	19-Jul-16 19-Jul-16 Contractor		
BD00903, PR13615: U2016-0588	05-May-105-May-1Contractor		
BD00938 PR13632(U2016-1119	06-Sep-1(06-Sep-1(Contractor		
BD00903 PR13615 U2016-0587	05-May-105-May-1Contractor		
BD00913(PR13620)U2016-0736	09-Jun-1609-Jun-16 Contractor		
BD00913 PR13620 U2016-0737	09-Jun-1f 09-Jun-1f Contractor		
BD00836 PR13569(U2015-0801	28-Jul-15 28-Jul-15 Contractor		
BD00741-PR134812U2014-0089	31-Jan-1431-Jan-14Contractor		
BD00513 PR13229(U2010-0175	02-Mar-102-Mar-1 Contractor		
BD00800: PR135404 U2015-0043	16-Jan-1516-Jan-15Contractor		
BD00912: PR13620(U2016-0734	09-Jun-1609-Jun-16Contractor		
BD00912 PR13620 U2016-0735	09-Jun-1609-Jun-16Contractor		
BD00886 PR13604 U2016-0304	14-Mar-114-Mar-1 Contractor		
BD00896 PR13612 U2016-0482	18-Apr-1(18-Apr-1(Contractor		
BD00800: PR13540: U2015-0042	16-Jan-1516-Jan-15Contractor		
BD00835- PR13568- U2015-0782	24-Jui-15 24-Jul-15 Contractor		
BD00885: PR13603! U2016-0296	14-Mar-114-Mar-1 Contractor		
BD00856: PR13583:U2015-1186	26-Oct-1: 26-Oct-1: Contractor		
BD00480: PR13196! U2009-0722	11-Sep-0! 11-Sep-0! Contractor		
BD00510 PR13226; U2010-0126	16-Feb-1(16-Feb-1(Contractor		
BD00657: PR13384; U2012-0627	06-Aug-1 06-Aug-1 Contractor		
BD00804 PR13542: U2015-0149	12-Feb-1!12-Feb-1!Owner	MOBILE HOME	
BD00835 PR10261 U2015-0777	23-Jui-15 23-Jul-15 Contractor		
BD00730 PR13467(U2013-1056	24-Oct-1: 24-Oct-1: Contractor		
BD00639 PR13359(U2012-0282	12-Apr-1;12-Apr-1; Other	MOBILE HOME	
BD00758 PR10237(U2014-0430	30-Apr-1430-Apr-14 Contractor		
BD00992 PR136588 U2017-0375	30-Mar-130-Mar-1 Contractor		
BD00955 PR11689: U2016-1429	04-Nov-1 04-Nov-1 Other	MOBILE HOME	
BD01042 PR11824! U2017-1079	27-Sep-1 27-Sep-1 Contractor		
BD00991 PR13653: U2017-0360	27-Mar-127-Mar-1 Owner	NEW HOUSE	
BD00815 PR13543 U2015-0365	15-Apr-1: 15-Apr-1: Owner	MOBILE HOME	1
BD00375: PR13108: U2008-0554	20-Jun-08 20-Jun-08 Owner	MOBILE HOME	
BD00543 PR13257 U2010-0610	16-Jui-10 16-Jul-10 Owner	MOBILE HOME	
BD00636; PR13338; U2012-0205	22-Mar-122-Mar-1 Contractor		
BD00976 PR13644: U2017-0142	03-Feb-1103-Feb-110wner	MOBILE HOME	

20-Feb-1, 26-Aug-1, CT00001, 088802567991 08-Nov-1 15-Jun-16 CT00053:088802568399 29-Aug-1: 1S-Mar-1 CT00001,088802568750 16-Jun-1(10-Mar-1 CT00021:088802569459 05-Sep-1:28-Apr-1: CT00001:088802569633 23-Sen-1/24-Mar-1 088802569871 26-Jan-1E 28-Jul-15 CT00001;088802572035 26-Jan-16 28-Jul-15 CT00001;088802573100 19-Jan-1628-Jul-15 CT00001:088802573165 22-Feb-1(28-Jul-15 CT00001,088802574071 16-Sep-1(15-Mar-1 CT00001;088802574221 16-Sep-1{14-Mar-1 CT00001:088802575207 03-Feb-1:09-Jun-1(CT00001;088802576064 28-Dec-1(09-Jun-1(CT00001;088802576103 01-Nov-1 05-May-1 CT00001, 088802576420 07-Dec-1:05-May-1CT00001,088802576551 13-Dec-1(05-May-1CT00001)088802576579 08-May-111-Aug-1 CT00002 182400212030 15-Feb-1:14-Jul-16 CT00001;088802577282 07-Dec-1(05-May-1 CT00001;088802577616 07-Nov-1 22-Jul-13 CT00001:088802577763 28-Dec-1(14-Jul-16 CT00001;088802578020 20-Feb-1: 26-Aug-1: CT00001: 088802578076 30-Dec-1(14-Jul-16 CT00001:088802578353 01-Nov-1 05-May-1 CT00001, 088802578552 15-Feb-1:01-Sep-1(CT00001:088802579132 04-Oct-1(05-May-1 CT00001:088802579196 14-Nov-1 09-Jun-16 CT00001,088802579359 14-Nov-109-Jun-1(CT00001,088802579406 06-Jan-1E 28-Jul-15 CT00001:088802579773 03-Apr-1(17-Jan-14 088802588647 2 1-Jul-10 02-Mar-1 CT00021:088802660818 27-Aug-1:09-Jan-15 CT00053: 088802660975 26-Oct-1(09-Jun-1(CT00001,088802670204 21-Nov-1 09-Jun-1(CT00001; 088802670303 26-Aug-1:15-Mar-1 CT00001,088802670598 03-Nov-1 15-Apr-1(CT00001,088802670635 24-Jun-1509-Jan-15CT00053:088802671030 12-Nov-1 13-Jul-15 CT00053 088802671030 29-Aug-1:14-Mar-1 CT00001,088802671473 22-Mar-123-Oct-1: CT00001:088802671530 12-Jan-1C 10-Sep-0' CT00021: 088802672007 16-Jun-1(15-Feb-1(CT00021:088802672277 05-Feb-1:06-Aug-1 CT00109:088802685317 21-Apr-15 00:00:00 088802691398 12-Feb-1(23-Jul-15 CT00003:088802780919 14-May-121-Oct-1: CT00133: 088802795904 21-May-12 00:00:0 CT00013; 088802971386 26-Aug-1-30-Apr-1/CT000017088806296962 01-Aug-1 29-Mar-1 CT00073! 19135548570 01-Dec-16 00:00:00 CT00013 088900059271 01-Dec-17 00:00:00 088900254631 22-Nov-1 21-Mar-1 CT00077,088902565389 29-May-15 00:00:0 CT00013; 088902665839 13-Jan-10 00:00:00 088902684199 18-Oct-10 00:00:00 CT00013:088902859226 13-Jun-1222-Mar-1 CT000405 088902970834 02-Jun-17 00:00:00 CT00013;088904532884

10-Feb-1:09-Jun-1ECT00001:088802567907

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WICK ROAD	STEM NC 27581
ANGUSPLACE	STEM NC 27581
WICK ROAD	STEM NC 27581
ANGUS PLACE	STEM NC 27581
GLASGOW STREET	STEM NC 27581
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BLUEBELL LN	512011027501
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GLASGOW STREET	STEM NC 27581
ANGUS PLACE	STEM NC 27581
ANGUS PLACE	STEM NC 27581
GLASGOW STREET	STEM NC 27581
ANGUS PLACE	STEM NC 27581
GLASGOW STREET	STEM NC 27581
SERINITY DRIVE	STEM NC 27581
ANGUS PLACE	STEM NC 27581
ANGUSPLACE	STEM NC 27581
TUMP WILKINS ROAD	
SERINITY DR	
UNITY WAY	STEM NC 27581
TUMP WILKINS ROAD	STEM NC 27581
MINERAL SPRINGS ROAD	OXFORD NC 27565
CREEDMOOR ROAD	STEM NC 27581
BLUEGRASS DRIVE	OXFORD NC 27565
TALLY HO RD	
EASY ST	STEM NC 27581
TALLY HO RD	
SANDERS RD	
	OXFORD NC 27565
SANDERS ROAD	STEM NC 27581
BELLTOWN RD DEERFIELD RD	OXFORDNC 27565

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BEAVER DAM ROAD	
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BD00815: PR13539(U2015-0371 16-Apr-1!16-Apr-1!Contractor NEW HOUSE BD00721/PR134211U2013-0879 06-Sep-1:06-Sep-1:Contractor NEW HOUSE BD00263:PR12995(U2007-0656 21-Jun-0721-Jun-070wner MOBILE HOME BD00749 PR13478 U2014-0280 26-Mar-1 26-Mar-1 Owner NEW HOUSE BD00571 PR13291 U2011-0042 2 5-Jan-1125-Jan-11 Contractor NEW HOUSE BD00771/PR13508(U2014-0717 21-Jul-14 21-Jul-14 Contractor NEW HOUSE BD00844 PR13564 U2015-0952 01-Sep-1/01-Sep-1/ Contractor NEW HOUSE BD00882(PR13599)U2016-0248 29-Feb-1(29-Feb-1(Owner MOBILE HOME BD00949/PR136365U2016-1320 13-Oct-1f13-Oct-1f Contractor MOBILE HOME BD00713 PB13435(U2013-0702 19-Jul-13 19-Jul-13 Contractor NEW HOUSE BD00781 PR10173 U2014-0904 10-Sep-1/10-Sep-1/Other MOBILE HOME BD00655, PR13369, U2012-0591 24-Jul-12 24-Jul-12 Contractor MODULAR HOME BD01009/PR13259/U2017-0616 30-May-130-May-1 Owner NEW HOUSE BD00982/PR13532/U2017-0225 21-Feb-1:21-Feb-1:Owner MOBILE HOME BD00948 PR11596; U2016-1288 10-Oct-1(10-Oct-1(Other MOBILE HOME BD00534/PR13232(U2010-0471 04-Jun-1(04-Jun-1(Owner MOBILE HOME BD00928 PR12377{ U2016-0970 04-Aug-1: 04-Aug-1: Other MOBILE HOME BD00643 PR13368 U2012-0371 07-May-107-May-10wner MOBILE HOME BD00932/PR13603/U2016-1028 16-Aug-1/16-Aug-1/Contractor MODULAR HOME BD00911/PB13615(U2016-0720 08-Jun-1608-Jun-16 Contractor MOBILE HOME BD00767:PR12477: U2014-0634 30-Jun-1/ 30-Jun-1/ Contractor MOBILE HOME BD00888'PR13596/U2016-0336 17-Mar-117-Mar-1 Contractor NEW HOUSE BD00876 PR13581(U2016-0123 01-Feb-1(01-Feb-1(Contractor MODULAR HOME BD0085S; PR12056{U2015-1175 22-Oct-1: 22-Oct-1: Contractor MOBILE HOME BD00715 PR13450(U2013-0749 30-Jul-13 30-Jul-13 Owner MOBILE HOME BD00538 PR13242 U2010-0528 21-Jun-1(21-Jun-1(Contractor NEW HOUSE BD00953 PR13639: U2016-1406 01-Nov-1 01-Nov-1 Owner MODULAR HOME BD00889.PR12107 U2016-0346 17-Mar-117-Mar-1 Owner NEW HOUSE BD00577-PR132555U2011-0118 25-Feb-1:25-Feb-1:Owner NEW HOUSE BD00898 PR13298 U2016-0513 22-Apr-1(22-Apr-1(Contractor NEW HOUSE BD01018 PR13658(1)2017-0759 05-Jul-17 05-Jul-17 Contractor NEW HOUSE BD00488; PR13195; U2009-0846 20-Oct-0; 20-Oct-0; Owner NEW HOUSE BD00863 PR13586 U2015-1300 24-Nov-1 24-Nov-1 Contractor NEW HOUSE BD00651: PR13388{ U2012-0523 05-Jul-12 05-Jul-12 Contractor NEW HOUSE BD00642(PR13248:U2012-0348_01-May-101-May-10wner____NEW HOUSE BD00679 PR13401{U2013-0055 16-Jan-1316-Jan-13Contractor NEW HOUSE BD00532:PR13223;U2010-0454 02-Jun-1(02-Jun-1(Owner NEW HOUSE BD00600/PR13323/U2011-0500 06-Jul-11 06-Jul-11 Contractor NEW HOUSE BD01072 PR10159!U2018-0130 12-Feb-1!12-Feb-1!Other MOBILEHOME BD00896/PR12153. U2016-0470 14-Apr-1f14-Apr-1fContractor MOBILE HOME BD00720 PR13454(U2013-0847 28-Aug-1 28-Aug-1 Owner MOBILE HOME BD00400 PR13103 U2008-0785 10-Sep-0/10-Sep-0/Owner NEW HOUSE BD00952 PR13524: U2016-1372 27-Oct-1(27-Oct-1(Contractor NEW HOUSE BD00469; PR13184; U2009-0585 04Aug-0:04-Aug-0:0wner NEW HOUSE BD00561/PR13270; U2010-0934 20-Oct-1(20-Oct-1(Contractor MODULAR HOME BD00961 PR12766/U2016-1534 02-Dec-1(02-Dec-1)Other MOBILE HOME BD00758/PR13489/U2014-0449 05-May-105-May-1Contractor NEW HOUSE BD00576'PR13295: U2011-0112 24-Feb-1: 24-Feb-1: Owner NEW HOUSE BD00516-PR13224{U2010-0214 12-Mar-112-Mar-1 Owner MOBILE HOME BD00842:PR13546/U2015-0915 24-Aug-1:24-Aug-1:Contractor NEW HOUSE BD00909/PR13592(U2016-0679 31-May-131-May-1Contractor NEW HOUSE BD00530 PR13246: U2010-0419 18-May-118-May-1 Owner NEW HOUSE BD00866 PR13577: U2015-1333 03-Dec-1! O3-Dec-1! Contractor NEW HOUSE BD01042 PR11079 U2017-1080 28-Sep-1 28-Sep-1 Other MOBILE HOME BD00901/PR13607/U2016-0557 02-May-102-May-1Contractor NEW HOUSE BD00481/PR13195{U2009_0738 15-Sep-0!15-Sep-0!Contractor NEW HOUSE BD00570 PR13288{U2011-0013 07-Jan-1107-Jan-11Contractor NEW HOUSE BD00770 PR13512: U2014-0676 10-Jul-14 10-Jul-14 Contractor NEW HOUSE BD01021/PR12961;U2017-0790 10-Jul-17 10-Jul-17 Contractor NEW HOUSE

05-Aug-1'10-Apr-1! CT001437089800345575 29-Apr-1/05-Sep-1/CT00001(089800369746 14-Jul-10.00:00:00 089800484685 22-Oct-1/ 24-Mar-1 CT00077;089800555920 06-May-125-Jan-11CT00040(089800814214 08-Dec-1, 18-Jul-14 CT00143(089900039499 21-Jan-1£31-Aug-1 CT00001£089900059994 09-May-1600:00:0 CT00059:089900103515 16-Nov-16 00:00:0(CT000812089900139136 07-Nov-1 19-Jul-13 CT00040(089900154299 14-Nov-14 00:00:0(CT00013(089900244363 19-Nov-1 24-Jul-12 CT00020, 089900301428 22-May-1 25-May-1 CT00077, 089900404844 05-Mar-18 00:00:0(CT00191(089900675341 03-Nov-16 00:00:00 089900694355 28-Sep-12 00:00:0C CT00013; 089900790291 01-Nov-16 00:00:0(CT00013(089900798500 08-Aug-12 00:00:00 CT00077 089900799701 03-Jan-1709-Aug-1 CT000412089900993385 11-Aug-16.00.00.00 CT00026.089900996866 03-Sep-1400:00:0CCT00041{089904631380 23-Sep-1(18-Mar-1 CT00118(095200971112 31-May-129-Jan-16 CT00163' 095500922645 18-Nov-15 00:00:0(CT000812096000086549 03-Sep-13 00:00:0C CT00130: 096000141970 16-Nov-1 18-Jun-1(CT00001(096000155076 17-Jan-1708-Sep-1(096000661733 24-Jan-17 15-Mar-1 CT00077, 096100114062 06-lun-1225-Feb-1 CT00077:096100154751 28-Feb-1:12-Apr-1(CT00009:096100166737 09-Feb-1(03-Jul-17 CT00001,096100275006 02-May-119-Oct-09 096100362822 25-Aug-1:02-Nov-1 CT00061{096100372927 13-Aug-1 05-Jul-12 CT001074 096100384443 26-Mar-1 30-Apr-1; CT00077; 096100477501 22-Jul-13 16-Jan-13CT00002(096200294599 21-Sep-1(01-Jun-10 00:00:00 096200781461 28-Sep-1:06-Jul-11 CT00042:096200891497 05-Mar-18 00:00:00 096200963231 10-lun-16 00:00:00 CT00130 096300156823 08-Oct-13 00:00:00 CT00077, 096300625600 19-Feb-1(10-Sep-0) 096300633356 24-Feb-17 00:00:0C CT00184 096300797169 23-Apr-1(29-Jul-09 096400406237 01-Dec-1(19-Oct-1(096400507465 17-Feb-17 00:00:0C CT00013: 096400707391 20-Aug-1, 21-Apr-1, CT00139, 096600103649 20-Sep-1: 17-Feb-1' CT00077: 096600732264 23-Jun-10 00:00:00 096700732271 07-Jan-16 00:00:00 CT00001 096700930143 05-Jan-1711-Apr-1(CT00077:096800072549 21-Apr-1:12-May-1 096800386317 22-lun-1601-Dec-1/CT00168/096800418159 08-Dec-17 00:00:00 CT00013;096800579811 06-Oct-1f 21-Mar-1 CT00002; 182400121237 2 4 Jun-1(15-Sep-0(CT00001(097000536482 18-Apr-1:06-Jan-11CT00076(097000603277 11-Dec-1/09-Jul-14 CT00143;097000603462 11-Apr-1(30-Jun-1) CT00159(097000620354

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WEST THOLLIE GREEN RD	STEM NC 27581
EVERGREEN TRL	STEM NC 27581
CAREWOODS DR W THOLLIE GREEN RD	
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WEST THOLLIE GREEN RD	STEM NC 27581
AST THOLLIE GREEN RD	STEM NC STEM NC 27581
CRITTER TRAIL	
OHNSON CREEK FARM RD	OXFORD NC 27565 STEM NC
OHNSON CREEK FARMS ROAD	OXFORD NC 27565
MITH RD	
MITH RD	OXFORD NC 27565
DEER TRAIL	OXFORD NC 27565
DEER TRAIL	OXFORD NC 27565 OXFORD NC 27565
	STEM NC 27581 ROUGEMONT NC
GOSHEN RD	
ENON RD	OXFORD NC 27565 OXFORD NC 27565
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ALCON LN	
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JZZLE ROAD	ROUGEMONT, NC 27572
ANGE ROAD	ROUGEMONT, NC 27572
OBACCO WAY	ROUGEMONT NC 27572
REDSTONE CT	ROUGEMONT NC 27572
MORIAH RD	ROUGEMONT NC 27572
DUKE DR	ROUGEMONT NC 27572
COLLIE JONES RD	ROUGEMONT NC 27572
COLLIE JONES RD	
HWY 158 WEST	ROUGEMONT NC 27572
HIGHWAY 158	ROUGEMONT NC 27572
HIGHWAY 158	ROUGEMONT NC 27572
HIGHWAY 158	ROUGEMONT NC 27572
ESTER MCFARLAND ROAD	OXFORD NC 27565
GOSHEN ROAD	OXFORD NC 27565
WALNUT GROVE RD	OXFORD NC 27565
WALNUT GROVE ROAD	OXFORD NC 27565
RAYMOND ROYSTER RD	ROXBORO NC 27573
CHARLIE STOVALL RD	OXFORD NC 27565
WEBB CHAPEL RD	OXFORD NC 27565
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BD00649 PR13269(U2012-0478 19-Jun-1219-Jun-12Contractor NEW HOUSE BD00525(PR13216(U2010-0324 19-Apr-1(19-Apr-1(Contractor MODULAR HOME BD00732-PR13468(U2013-1108 08-Nov-108-Nov-1 Contractor NEW HOUSE BD00997 PR10223 U2017-0421 12-Apr-1: 12-Apr-1: Contractor NEW HOUSE BD00748 PR13211{U2014-0261 21-Mar-1 21-Mar-1 Contractor MODULAR HOME BD00627(PR13349(U2012-0046 20-Jan-1220-Jan-120wner MOBILE HOME BD01037 PR10364{U2017-1018 11-Sep-1 11-Sep-1 Owner MOBILE HOME BD01015 PR13668(U2017-0712 22-Jun-1722-Jun-17Other MOBILE HOME BD00736 PR13470(U2013-1190 03-Dec-1:03-Dec-1: Contractor MOBILE HOME BD00930/PR12366(U2016-1001 11-Aug-1/11-Aug-1/Contractor MODULAR HOME BD01008/PR11845:U2017-0581 19-May-119-May-1Contractor MOBILE HOME MOBILE HOME BD00781/PR13520.U2014-0903 10-Sep-1/10-Sep-1/Other BD00856 PR13579: U2015-1177 22-Oct-1: 22-Oct-1: Contractor NFW HOUSE BD00598/PR13321/U2011-0462 23-Jun-1123Jun-11Contractor MODULAR HOME BD00927 PR13604(U2016-0963 02-Aug-1/02-Aug-1/Contractor NEW HOUSE BD00929:PR13628!U2016-0984 09-Aug-1:09-Aug-1:Contractor NEW HOUSE BD00884 PR10505 U2016-0271 04-Mar-104-Mar-1 Owner MOBILE HOME BD00656 PR13382 U2012-0615 02-Aug-1 02-Aug-1 Other MOBILE HOME BD00839 PR13503 U2015-0862 11-Aug-1 11-Aug-1 Contractor MODULAR HOME BD00593(PR13303(U2011-0367 26-May-126-May-1Contractor NEW HOUSE BD00595/PR13316¿U2011-0403 06-Jun-1106-Jun-11Contractor NEW HOUSE BD00539 PR13248 U2010-0545 23-Jun-1(23-Jun-1(Other MODULAR HOME BD00541 PR13245(U2010-0562 29-Jun-1(29-Jun-1(Owner MOBILE HOME BD00646 PR13095 U2012-0414 25-May-125-May-1 Other MOBILE HOME BD00901 PR13607{U2016-0558 02-May-102-May-1 Contractor NEW HOUSE BD01017(PR12374)U2017-0740 28-Jun-1728-Jun-17Contractor MOBILE HOME BD00484 PR13197(U2009-0781 23-Sep-0! 23-Sep-0! Contractor MODULAR HOME BD00702/PR13409/U2013-0505 07-Jun-1207-Jun-120wner NEW HOUSE BD00835: PR12888(U2015-0783 24-Jul-15 24-Jul-15 Other MOBILE HOME BD00674 PR13400{U2012-0986 03-Dec-1.03-Dec-1.Owner MOBILE HOME BD00876:PR13519:U2016-0120 01-Feb-1(01-Feb-1(Contractor MODULAR HOME MODULAR HOME BD00879; PR11705{U2016-0189 16-Feb-1(16-Feb-1(Other BD00841 PR13561! U2015-0903 21-Aug-1:21-Aug-1:Contractor NEW HOUSE BD00782; PR13522(U2014-0933 18-Sep-1/18-Sep-1/Other MOBILE HOME BD01082 PR11708 U2018-0283 23-Mar-1 23-Mar-1 Other MOBILE HOME BD00701 PR13430; U2013-0483 03-Jun-1: 03Jun-1: Contractor MOBILE HOME BD00801/PR13425/U2015-0054 20-Jan-1520-Jan-15Owner MOBILE HOME BD00727'PR13462:U2013-1008 15-Oct-1:1S-Oct-1:Contractor NEW HOUSE BD00797, PR13529(U2014-1285 16-Dec-1, 16-Dec-1, Contractor MODULAR HOME BD00573' PR13290{ U2011-0067 07-Feb-1: 07-Feb-1: Contractor MOBILE HOME BD00332/PR10210!U2008-0076 29-Jan-0EOwner NEW HOUSE MOBILE HOME BD00927 PR12772 U2016-0959 01-Aug-1(01-Aug-1) Owner BD00666 PR13305; U2012-0816 02-Oct-1; 02-Oct-1; Contractor NEW HOUSE BD00892 PR13592 U2016-0403 30-Mar-1 30-Mar-1 Owner NEW HOUSE BD00565 PR13258 U2010-1021 22-Nov-1 22-Nov-1 Contractor MODULAR HOME BD00809 PR13519 U2015-0261 23-Mar1 23-Mar1 Contractor NEW HOUSE BD00735/PR13257(U2013-1175 26-Nov-1 26-Nov-1 Contractor NEW HOUSE BD00911 PR13619 U2016-0719 08-Jun-1608-Jun-16 Contractor MODULAR HOME BD00844/PR13552 U2015-0959 02-Sep-1/02-Sep-1/Contractor MODULAR HOME BD00815/PR13552 U2015-0369 16-Apr-1! 16-Apr-1! Contractor NEW HOUSE MODULAR HOME BD00577 PR13294(U2011-0117 25-Feb-1 25-Feb-1 Other BD00740; PR13112' U2014-0054 16-Jan-1416-Jan-14Other MOBILE HOME BD00298; PR13022; U2007-1029 01-Oct-0; 01-Oct-0; Owner NEW HOUSE BD00544/PR13259/U2010-0635 27-Jul-10 27-Jul-10 Contractor MOBILE HOME BD00501'PR13192'U2010-0015 08-Jan-1C08-Jan-1COther MOBILE HOME BD00910/PR13066: U2016-0704 06Jun-1E06-Jun-1EContractor NEW HOUSE BD00538 PR13251 U2010-0539 22-Jun-1(22-Jun-1(Owner NEW HOUSE BD00679/ PR13389: U2013-0054 16-Jan-1316-Jan-13Contractor MODULAR HOME BD00861'PR135754U2015-1266 13-Nov-1 13-Nov-1 Contractor NEW HOUSE

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CULBRETH RD	OXFORD NC 27565
ENON RD	OXFORDNC 27565
ENON ROAD	OXFORD NC 27565
ENON RD	OXFORD NC 27565
RANGE ROAD	OXFORD NC 27565
COMMUNITY RD	ROUGEMONT NC 27572
HIGHWAY 158	
HIGHWAY 158	ROUGEMONT NC
HIGHWAY 158 WEST	ROUGEMONT NC
WALNUT CREEK DRIVE	
CINDY LN MATTI LANE	OXFORD NC 27565
BEN THORP RD	OXFORD NC 27565
WALNUT GROVE ROAD	OXFORD NC 27565
	OXFORD NC 27565
WALNUT GROVE ROAD WALNUT GROVE ROAD	OXFORD NC 27565 OXFORD NC 27565
HENRY HUFF RD	OXFORD NC 27565
GOSHEN RD	OXFORD NC 27565 OXFORD NC 27565
JACK ADCOCK ROAD	OXFORD NC 27565
JACK ADCOCK ROAD	OXFORD NC 27565 OXFORD NC 27565
CHARLIE STOVALL RD	OXFORD, NC 27565
CHARLIE STOVALL RD	OXFORD, NC 27565 OXFORD NC 27565
CHARLIE STOVALL RD	OXFORD NC 27565
SHEP RAGLAND RD	OXFORD NC 27565
BUTTERFLY CIR	UAFORD NC 27365
HIGHWAY 96	OXFORD NC 27565
LONNIE HARRIS RD	OXFORD NC 27565
CULBRETH ROAD	STEM NC 27581
NORTHRIDGE DR	STEM NC 27581
OLD ROUTE 75	STEM NC
OLD ROUTE 75	OXFORD NC 27565
PECAN DR	STEM NC 27581
JACK CLEMENT RD	STEM NC 27581
CEDAR RIDGE RD	STEM NC 27581
CEDAR RIDGE RD	STEM NC 27581
JACK CLEMENT RD	STEM NC 27581
CEDAR RIDGE RD	STEM NC 27581
OLD ROUTE 75	OXEORD NC 27565
GOOCHS MILL RD	OXFORD NC 27565
ENON RD	OXFORD NC 27565
JAMES ROYSTER RD	OXFORD NC 27565
GOOCHS MILL RD	OXFORD NC 27565
TOMMIE DANIEL ROAD	OXFORD NC 27565
GOOCHS MILL ROAD	OXFORD NC 27565
ROCK BOTTOM ROAD	OXFORD NC 27565
ROCK BOTTOM ROAD	OXFORD NC 27565
ROCK BOTTOM ROAD	OXFORD NC 27565
NEEDHAM DRIVE	OXFORD NC 27565
ROCK BOTTOM ROAD	OXFORD NC 27565
DOGWOOD DRIVE	OXFORD NC 27565
DOGWOOD DR	OXFORD NC 27565
HIGHWAY 158	OXFORD NC 27565
SHEP ROYSTER RD	OXFORD NC 27565
SHEP ROYSTER RD	OXFORD NC 27565
HIGHWAY 96	OXFORD NC 27565
HIGHWAY 96	OXFORD NC 27565
	OXFORD NC 27565
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HIGHWAY 96 OAK HILL ROAD	OXFORD NC 27565

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BD00588/PR13307/U2011-0283 28-Apr-1:28-Apr-1:Owner MOBILE HOME BD00910 PR11830(U2016-0708 06-Jun-1606-Jun-160wner MOBILEHOME BD00792' PR13515! U2014-1174 18-Nov-1 18-Nov-1 Contractor NEW HOUSE BD00710 PR13445: U2013-0645 02-Jul-1302-Jul-13 Contractor NEW HOUSE BD00864 PR13583; U2015-1311 01-Dec-1!01-Dec-1! Contractor MODULAR HOME BD00658'PR13334(U2012-0657 14-Aug-1 14-Aug-1 Owner MOBILE HOME BD00918'PR13536{U2016-0830 0S-Jul-16 05-Jul-16 Contractor NEW HOUSE BD00900 PR13531(U2016-0535 27-Apr-1/27-Apr-1/Contractor NEW HOUSE BD00882 PR13011: U2016-0238 26-Feb-1(26-Feb-1(Contractor NEW HOUSE BD00981-PR13646: U2017-0205 17-Feb-1 17-Feb-1 Contractor NEW HOUSE BD00514.PR13227! U2010-0185 08-Mar-108-Mar-1 Contractor NEW HOUSE BD00816/PR13SS1(U2015-0373 16-Apr-1:16-Apr-1:Owner MOBILE HOME BD00678 PR13219(U2013-0020 08-Jan-1308-Jan-13 Contractor NEW HOUSE BD00678/PR13408: U2013-0016 03-Jan-1303-Jan-13 Contractor NEW HOUSE BD00890/PR10244(U2016-0357 18-Mar-118-Mar-1 Contractor NEW HOUSE BD00863 PR13572{U2015-1292 20-Nov-1 20-Nov-1 Contractor NEW HOUSE BD00901; PR13608(U2016-0559 02-May-102-May-1Contractor NEW HOUSE BD00568'PR13282(U2010-1083 13-Dec-1(13-Dec-1)Contractor NEW HOUSE BD00784 PR13519, U2014-0977 29-Sep-1(29-Sep-1) Contractor MODULAR HOME BD00746 PR13478 U2014-0211 05-Mar-105-Mar-1 Contractor NEW HOUSE BD00504 PR13219; U2010-0044 13-Jan-1(13-Jan-1(Contractor NEW HOUSE BD00488' PR13203{U2009-0847 20-Oct-0{20-Oct-0{Contractor NEW HOUSE BD00524 PR13238:U2010-0308 14-Apr-1(14-Apr-1(Contractor NEW HOUSE BD00993 PR136211U2017-0380 31-Mar-1 31-Mar-1 Contractor NEW HOUSE BD00744 PR13478: U2014-0154 19-Feb-1/19-Feb-1/Contractor NEW HOUSE BD00905 PR13609 U2016-0621 16-May-116-May-1 Contractor NEW HOUSE BD00591 PR13308: U2011-0329 16-May-116-May-1 Contractor NEW HOUSE BD00789/PR13S03/U2014-1080 22-Oct-1/22-Oct-1/Contractor NEW HOUSE BD01030 PR13672 U20170928 15-Aug-1 15-Aug-1 Contractor NEW HOUSE BD00552 PR13258(U2010-0786 07-Sep-1(07-Sep-1(Contractor NEW HOUSE BD00523 PR13238 U2010-0306 14-Apr-1(14-Apr-1(Contractor NEW HOUSE BD00853/PR13507(U2015-1119 09-Oct-1:09-Oct-1:Contractor NEW HOUSE BD00883 PR13531(U2016-0260 02-Mar-102-Mar-1 Contractor NEW HOUSE BD00524(PR13238(U2010-0307 14-Apr-1(14-Apr-1(Contractor NEW HOUSE BD00504 PR13219/U2010-0043 13-Jan-1013-Jan-10 Contractor NEW HOUSE BD00770/PR13478/U2014-0680 10-Jul-1410-Jul-14 Contractor NEW HOUSE BD00599 PR13311 U2011-0483 29-Jun-1129-Jun-11Owner NEW HOUSE BD00838 PR13565(U2015-0844 04-Aug-1' 04-Aug-1' Owner MOBILE HOME BD00880/PR13540.U2016-0210 22-Feb-1(22-Feb-1(Contractor NEW HOUSE BD00800/PR134091U2015-0037 15-Jan-1515-Jan-15 Owner MOBILE HOME BD00740 PR13300(U2014-0055 16-Jan-1416-Jan-14Owner MOBILE HOME BD00990-PR13657^tU2017-0343 23-Mar-123-Mar-1 Contractor MODULAR HOME BD00529 PR13243 U2010-0388 07-May-107-May-1 Contractor NEW HOUSE BD00998 PR13588 U2017-0440 19-Apr-1 19-Apr-1 Contractor MODULAR HOME BD00637 PR13359 U2012-0239 02-Apr-1: 02-Apr-1: Contractor MOBILE HOME BD00724 PR13309 U2013-0941 27-Sep-1 27-Sep-1 Contractor NEW HOUSE BD01038 PR10405(U2017-1031 12-Sep-1:12-Sep-1:Other MOBILE HOME BD00564 PR11549/U2010-0998 16-Nov-1 16-Nov-1 Owner MOBILE HOME BD00796: PR13527: U2014-1276 16-Dec-1: 16-Dec-1: Owner NEW HOUSE BD00891 PR13598 U2016-0377 24-Mar-124-Mar-1 Contractor MOBILE HOME BD00765/PR13500(U2014-0571 11-Jun-1/11-Jun-1/ Contractor NEW HOUSE BD00906/ PR13607(U2016-0622 16-May-116-May-1 Contractor NEW HOUSE BD01006 PR10460: U2017-0557 16-May-116-May-1 Contractor NEW HOUSE BD00572: PR13264{U2011-0054 28-Jan-1128-Jan-11Owner NEW HOUSE BD00780 PR12762! U2014-0881 03-Sep-1/03-Sep-1/Contractor NEW HOUSE BD00655/PR13381; U2012-0582 23-Jul-12 23-Jul-12 Owner MOBILE HOME BD00648 PR13372! U2012-0458 12-Jun-1212-Jun-12 Contractor NEW HOUSE BD00660 PR13373 U2012-0690 24-Aug-1 24-Aug-1 Contractor MOBILE HOME BD00819 PR13552(U2015-0444 05-May-105-May-1Contractor MOBILE HOME

26-May-1100:00:0:CT00013:099000352817 11-Jul-16.00:00:00 099000353991 01-Apr-1113-Nov-1 CT00001:099000417271 28-Apr-1/03-Jul-13 CT00128(099000606418 01-Mar-1 25-Nov-1 CT00081: 099000609600 01-Apr-1300:00:00CT00013(099000698466 17-Nov-1 20-Jun-1(CT00040(099000700627 27-Oct-1f 22-Oct-1f CT00040f 099000701603 27-Jul-16 25-Feb-1(CT00001(099000701879 13-Jul-17 15-Feb-1; CT00040; 099000704521 09-Jul-10 05-Mar-1 099000799788 12-Jun-15 00:00:00 099000920463 25-Apr-1:07-Jan-12CT000402099000923904 19-Jul-13 28-Dec-1: CT00001(099100079394 10-Nov-1 17-Mar-1 CT00056/099100240747 19-Sep-1(05-Oct-1, CT00106(099100318065 07-Nov-1 24-Mar-1 CT00002, 182400121237 17-Oct-1114-Dec-1(CT000022099100791413 08-Jan-15 29-Sep-14 CT000412 099100867370 17-Sep-1/03-Mar-1 CT00040(099104500576 29-Mar-113-Jan-10000012099104504695 19-Mar-116-Oct-09 099104504739 06-Dec-1(14-Apr-1(099104504923 20-Jul-17 24-Mar-1 CT00040(099104505283 05-Jun-1418-Feb-14CT000405099104S0S420 26-Sep-1(04-Apr-1(CT00002, 182400121237 05-Aug-1 13-May-1CT000017099104510175 22-Jun-1521-Oct-14 CT000405099104510391 28-Feb-1118-Aug-1 CT000405099104513883 12-Jan-1219-May-1CT00066.099104514125 06-Dec-1(14-Apr-1(099104517219 29-Mar-1 18-Sep-1! CT00040(099104518334 08-Jul-16 26-Feb-1(CT00040-099104600928 06-Dec-1(14-Apr-1) 099104611114 30-Mar-1 13-Jan-10 CT000017099104611256 06-Oct-1(10-Jul-14 CT00040(099104612317 10-Nov-1 24-Jun-11CT00077;099104617143 16-Sep-15 00:00:00 099203203974 26-Oct-1f 22-Eeb-1f CT00055(099203243668 09-Jul-15 00:00:00 CT00013; 099300299268 05-Aug-15 00:00:00 099300382086 21-Jun-1721-Mar-1 CT00041(099300420988 30-Jul-10 04-May-1 099300462732 16-Oct-1; 19-Apr-1; CT00163: 099300580179 27-Apr-12 00:00:00 CT00081; 099300586655 11-Apr-14 00:00:00 CT000008 099304810645 19-Oct-17 00:00:00 099400197861 14-Nov-11 00:00:0(CT00060(099400292869 14-Dec-1'10-Dec-1/CT00077,099500169836 2 2-Apr-16 00:00:00 CT00081; 099500234655 26-May-103-Jun-1/CT001411099500349179 26-Oct-1f 24-Mar-1 CT00002 182400121237 01-Dec-1 26-Apr-1 CT00193 099800913542 03-May-128-Jan-11 099900114333 13-Apr-1:03-Sep-1/CT00001(099900311860 21-Sep-1200:00:0CCT00065:099900475969 08-May-106-Jun-12CT000002099900762928 27-Nov-12 00:00:0(CT00013, 099900823477 09-Jul-15 00:00:00 CT00013; 100000033034 2040

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THAD CAREY RD	STEMNC	Pamlic
THAD CAREY RD	STEM NC 27581	Pamlic
CARLEE FARM RD	OXFORD NC 27565	Pamlic
BELLTOWN ROAD	OXFORD NC 27565	Pamlic
BELLTOWN ROAD	OXFORD NC 27565	Pamlic
RIVERS EDGE	OXFORD NC 27565	Pamlic
BELLTOWN ROAD	OXFORD NC 27565	Pamlic
BELLTOWN RD	OXFORD NC 27565	Pamlic
BELLTOWN RD	OXFORD NC 27565	Pamlic
SMITH ROAD	OXFORD NC 27565	Pamlic
OLD ROUTE 75	OXFORD NC 27565	Pamlic
BELLTOWN RD	OXFORD NC 27565	Pamlic
BELLTOWN RD	OXFORD NC 27565	Pamlic
JAMES ROYSTER RD	OXFORD NC 27S65	Pamlic
AMES ROYSTER RD	OXFORD NC 27565	Pamlic
DLD ROUTE 75	OXFORD NC 27565	Pamlic
BUTTERFLY CIR		Neuse
WILKINS FARM ROAD	OXFORD NC 27565	Pamlie
HARPER RENN RD	OXFORD NC 27565	Pamlic
RVIN ST	OXFORD NC 27565	Pamlio
RVIN STREET	OXFORD NC 27565	Pamlio
RVINSTREET	OXFORD NC 27565	Pamlic
ALICE DRIVE	OXFORD NC 27565	Pamlic
IRVIN ST	OXFORD NC 27565	Pamlic
	OXFORD NC 27565	Pamlic
BUTTERFLY CIR	OXFORD NC 27505	
IRVIN ST	OXFORD NC 27565	Neuse Pamlie
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ALICE DRIVE	OXFORD NC 27565	Pamlic
ALICE DRIVE	OXFORD NC 27565	Pamlie
OLD ROUTE 75	OXFORD NC27565	Pamlic
ENON ROAD	OXFORD NC 27565	Pamlio
LUCY AVERETTE RD	OXFORD NC 27565	Pamlio
ELAM CURRIN ROAD	OXFORD NC 27565	Pamlie
ELAM CURRIN ROAD	OXFORD NC 27565	Pamlic
PAPPYS TRAIL	OXFORD NC 27565	Pamlie
HIGHWAY 158	OXFORD NC 27565	Pamlic
ELAM CURRIN RD	OXFORD NC 27565	Pamlio
ELAM CURRIN ROAD	OXFORD NC	Pamlic
TOMMIE DANIEL ROAD	OXFORD NC 27565	Pamlic
SUNSET ROAD	OXFORD NC 27565	Pamlie
SUNSET ROAD	OXFORD NC 27565	Pamlio
LITTLE SATTERWHITE ROAD	OXFORD NC 27565	Pamlie
LITTLE SATTERWHITE ROAD	OXFORD NC 27565	Pamlio
LITTLE SATTERWHITE ROAD	OXFORD NC 27565	Pamlic
BUTTERELY CIR	0/10/10 HC 27505	Neuse
MOUNTAIN CREEK RD	OXFORD NC 27565	Roand
DICK BLACKWELL ROAD		
OAK HILL ROAD	OXFORD NC 27565	Roano
	OXFORD NC 27565	Roano
	OXFORD NC 27565	Roano
	OXFORD NC 27565	Roano
CORNWALL ROAD	OXFORD NC 27565	Roano
ROBERT MORGAN ROAD	BULLOCK NC	Roano

BD00950: PR11928{ U2016-1345 19-Oct-1(19-Oct-1(Contractor MOBILE HOME BD00876: PR13583; U2016-0124 01-Feb-1(01-Feb-1(Contractor MODULAR HOME BD00860 PR13584 U2015-1250 09-Nov-1 09-Nov-1 Owner MOBILE HOME BD00818 PR13524;U2015-0423 01-May-101-May-10wner NEW HOUSE BD00902 PR10483 U2016-0572 03-May-103-May-1 Contractor MODULAR HOME BD00904: PR13613: U2016-0602 06-May-106-May-1Contractor NEW HOUSE BD00622 PR133428 U2011-0923 07-Dec-1 07-Dec-1 Owner MOBILE HOME BD00737: PR13475: U2013-1245 19-Dec-1. 19-Dec-1: Contractor MODULAR HOME BD00509 PR132228U2010-0109 10-Feb-1(10-Feb-1(Contractor MODULAR HOME BD00496 PR13208 U2009-0947 01-Dec-0: 01-Dec-0: Owner MOBILE HOME BD01015(PR12747(U2017-0699 2 0 Jun-1720-Jun-17 Contractor MOBILE HOME BD00908 PR13609 U2016-0662 25-May-125-May-1Contractor NEW HOUSE BD00910 PR13593 U2016-0697 02-Jun-1(02-Jun-1(Contractor NEW HOUSE BD00893 PR12403(U2016-0415 01-Apr-1(01-Apr-1(Contractor MODULAR HOME BD00877(PR10580:U2016-0132 02-Feb-1(02-Feb-1(Other MOBILE HOME BD00784 PR13470; U2014-0973 29-Sep-1/29-Sep-1/Contractor MODULAR HOME BD00490 PR13205(U2009-0872 29-Oct-0 29-Oct-0 Owner NEW HOUSE BD00532 PR13243(U2010-0443 26-May-126-May-1 Contractor MODULAR HOME BD00526 PR132404 U2010-0346 26-Apr-1(26-Apr-1(Owner NEW HOUSE BD00708 PR12832; U2013-0613 27-Jun-1: 27-Jun-1: Contractor NEW HOUSE BD00593 PR13315: U2011-0371 26-May-126-May-1 Owner MOBILE HOME BD01009/ PR13655(U2017-0603 24-May-124-May-1 Contractor MODULAR HOME BD01040: PR12074: U2017-1057 21-Sep-1: 21-Sep-1: Contractor MODULAR HOME BD00939/PR12074/U2016-1128 07-Sep-1(07-Sep-1) Owner MODULAR HOME BD00997/PR12075(U2017-0420 12-Apr-1:12-Apr-1:Contractor MODULAR HOME BD00839 PR13572 U2015-0857 07-Aug-1:07-Aug-1:Occupant MOBILE HOME BD00960(PR13546) U2016-1501 22-Nov-1 22-Nov-1 Contractor MODULAR HOME BD00755: PR13495+ U2014-0396 24-Apr-1+ 24-Apr-1+ Owner MOBILE HOME BD00843 PR135745U2015-0930 27-Aug-1 27-Aug-1 Contractor MODULAR HOME BD01058 PR13688(U2017-1358 04-Dec-1 04-Dec-1 Owner MOBILE HOME BD00923 PR13553(U2016-0911 21-Jul-16 21-Jul-16 Contractor NEW HOUSE BD00956 PR10637(U2016-1449 09-Nov-1 09-Nov-1 Occupant MOBILE HOME BD00642 PR13365(U2012-0332 24-Apr-1:24-Apr-1: Contractor MODULAR HOME BD00912 PR13434/U2016-0725 09-Jun-1(09-Jun-1(Contractor MODULAR HOME BD00858 PR12082: U2015-1204 29-Oct-1: 29-Oct-1: Contractor NEW HOUSE BD00947 PR13636(U2016-1259 05-Oct-1(0S-Oct-1(Contractor NEW HOUSE BD00966 PR13636 U2016-1606 20-Dec-1(20-Dec-1) Contractor NEW HOUSE BD00605 PR13326 U2011-0597 11-Aug-1 11-Aug-1 Owner MOBILE HOME BD00517 PR13211 (U2010-0221 15-Mar-1 15-Mar-1 Owner MOBILE HOME BD00586: PR13306/ U2011-0263 21-Apr-1: 21-Apr-1: Owner MOBILE HOME BD00687; PR13419; U2013-0235 13-Mar-113-Mar-1 Contractor MOBILE HOME BD00919; PB11579' U2016-0849 08-Jul-16 08-Jul-16 Occupant MOBILE HOME BD00902(PR13611(U2016-0568 03-May-103-May-1Other MOBILE HOME BD00772 PR10341(U2014-0733 23-Jul-14 23-Jul-14 Owner MOBILE HOME BD00590 PR13309: U2011-0311 09-May-109-May-1 Owner MOBILE HOME BD00704 PR13437/ U2013-0543 17-Jun-1:17-Jun-1: Owner MOBILE HOME BD00750: PR13491/ U2014-0295 28-Mar-128-Mar-1 Contractor MODULAR HOME BD00550;PR13267(U2010-0757 27-Aug-1)27-Aug-1)Owner MOBILE HOME BD00844 PR10847 U2015-0947 31-Aug-1 31-Aug-1 Contractor MOBILE HOME BD00932 PR13091 U2016-1036 17-Aug-1 Owner MOBILE HOME BD00825 PR11400(U2015-0550 02-Jun-1502-Jun-15 Contractor MODULAR HOME BD00839 PR13334(U2015-0861 11-Aug-1:11-Aug-1:Other MOBILE HOME BD01009 PR13614; U2017-0612 30-May-130-May-1Contractor NEW HOUSE BD00918; PR11973(U2016-0829 05-Jul-16 05-Jul-16 Contractor NEW HOUSE BD00670 PR13395 U2012-0890 01-Nov-1 01-Nov-1 Contractor NEW HOUSE BD00524: PR13217(U2010-0319 15-Apr-1(15-Apr-1(Owner MOBILE HOME BD00934/PR13628: U2016-1051 19-Aug-1: 19-Aug-1: Occupant MOBILE HOME BD00769 PR10325 U2014-0654 03-Jul-14 03-Jul-14 Contractor MOBILE HOME BD00727 PR13440(U2013-0986 11-Oct-1:11-Oct-1:Contractor NEW HOUSE

19-Dec-16 00:00:00 100000143364 28-Apr-1(29-Jan-1(CT00163:100000339891 18-Mar-16 00:00:00 100000535903 28-Dec-1:28-Apr-15 00:00:00 100000807388 15-Sep-1(29-Apr-1(100001073985 10-Jan-17 28-Apr-1(CT00124: 100001263806 13-Jan-12 00:00:00 CT00013 100100554323 04-Apr-1(16-Dec-1 CT00103 100100664103 02-Jun-1(29-Jan-1(100100944792 20-lan-10.00:00:00 101000324337 13-Oct-17 00:00:00 CT00013; 101000331088 19-Jan-1706-Apr-1(CT00002;182400121237 09-Dec-1(31-May-1CT00143; 101102555355 14-Dec-1(31-Mar-1 CT00165: 101103045861 19-Apr-16 00:00:00 CT00013; 101103418851 14-Jul-15 25-Sep-1 CT000588 101104521135 11-Sep-1, 28-Oct-05 101104532738 23-Sep-1(25-May-1 CT00058(101104535710 03-Dec-1(26-Apr-1(101104541180 31-Dec-1: 2 7-Jun-1: CT00042: 101104541253 16-Aug-11 00:00:00 CT00077, 101104824693 16-Oct-1; 24-May-1 CT00163: 102001263767 29-Mar-111-Sep-1: CT00199! 102103038078 11-May-131-Aug-1 CT00077, 102103130016 17-Aug-1 23-Mar-1 CT00020 102103138080 14-Mar-16 00:00:00 103002882864 02-Aug-1 18-Nov-1 CT00103 103102853886 04-Jun-14 00:00:00 CT001017 104000209708 11-Feb-1(19-Aug-1:CT00058(104000308543 09-Mar-18 00:00:00 104000559613 12-Jun-1708-Jul-16 CT00000; 104000649894 29-Mar-17 00:00:00 104000770993 30-Aug-1 24-Apr-1; CT00103; 104101053739 14-Mar-1 26-May-1 CT000588 105102669355 24-Feb-1: 28-Oct-1: CT00087; 105102950973 05-May-127-Sep-1(CT000008105103441249 01-Nov-1 05-Dec-1: CT00186(180300790880 14-Dec-11 00:00:00 CT00077, 180300798357 28-Apr-1000:00:00 180400808419 26-Apr-1100:00:00 CT00013 180400808419 25-Mar-13 00:00:0(CT00013; 180400808419 01-Sep-16 00:00:00 CT00063 180400808419 2 4 Jun-16 00:00:00 CT00013; 180400823306 23-Dec-14 00:00:00 180400903497 07-Jul-15 00:00:00 CT00013: 180402796174 21-Nov-13 00:00:0(CT00133{ 180402983268 06-Nov-14 00:00:0(CT00138! 180402987490 22-Oct-10 00:00:00 CT00013: 1804032741 01-Oct-15 00:00:00 CT00081/180501282182 31-Aug-16 00:00:00 180501361506 15-Oct-1: 28-May-1 CT00020: 180502567854 15-Dec-15 00:00:00 180502664729 20-Oct-1; 18-May-1CT00003; 180502799677 02-Feb-1:01-Jul-16 CT00178' 180503329046 13-May-125-Oct-1; CT000028 180503437273 21-Apr-10 00:00:00 180504534435 28-Oct-16 00:00:00 CT00109; 180504536804 23-Jui-14 00:00:00 CT00013; 180504619076 24-Jul-14 20-Sep-1: CT00132(180504715718

GEORGE WINSTON RD	
GOBBLER LANE	
CHARLIE WINSTON ROAD	
CHARLIE WINSTON RD	
GRASSY CREEK VIRGILINA RD	
GRASSY CREEK VIRGILINA ROAD	
PROPUS WILKINSON ROAD GRASSY CREEK ROAD	
PROPUS WILKINSON ROAD	
GRASSY CREEK RD	
GRASSY CREEK RD	
BUTTERFLY CIR	
LAKESIDE TERRACE	
PROPUS WILKINSON ROAD	
EDGEWOOD COURT	
PINEY POINT DRIVE	
LAKESIDE TERRACE	
GEORGE RUFF RD	
TILLEY ROAD	
WHIPPOORWILL RIDGE RD	
WHIPPOORWILL RIDGE RD	
WILLIAMSON ROAD	
HIGHWAY 15	
J I OAKES ROAD	
BUCKHORN RD MCDUFFIE ROAD	
MCDUFFIE ROAD	
MCDUFFIE ROAD	
MCDUFFIE RD	
JI OAKES ROAD	
ISLAND CREEK RD	
LAKEFRONT DRIVE	
TOWNSVILLE ROAD	
DOGWOOD HILL LN	
DOGWOOD HILL LN	
NORTHERN FALLS ROAD	
ROCK SPRING CHURCH RD	
NORTHERN FALLS ROAD	
TURNER RD	
TRAILWOOD DR	
TRAILWOOD DRIVE	
ROGERS QUARTERS ROAD BRASSFIELD ROAD	
BRASSFIELD ROAD	
BRASSFIELD ROAD	
BRASSFIELD ROAD	
BENNETT RD	
POPEROAD	
HORSESHOE RD	
GOSS DR	
GOSS DR	
HORSESHOE RD	
HORSESHOE RD	

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OXFORD NC 27565 BULLOCK NC 27507 OXFORD NC 27565 OXFORD NC 27565 BULLOCK NC 27507 BULLOCK NC 27507 OXFORD NC 27565 BULLOCK NC 27507 OXFORD NC 27565 BULLOCK NC 27507 OXFORD NC 27565 BULLOCK NC 27507 BULLOCK NC 27507 OXFORD NC 27565 BULLOCK, NC 27507 OXFORD NC 27565 BULLOCK NC 27507 WAKE FOREST NC 27587 CREEDMOOR NC 27522 CREEDMOOR NC CREEDMOOR NC 27522 CREEDMOOR NC 27522 CREEDMOOR, NC 27522 CREEDMOOR NC 27522 CREEDMOOR NC 27522 CREEDMOOR NC 27522

BULLOCK NC

Roanoke

Neuse

BD00872: PR13594: U2016-0041		MODULAR HOME	21-Jun-1608-Jan-16CT00013:		2062	KNIGHT ST		Neuse
BD00830 PR13561(U2015-0662			12-Oct-15 00:00:00 CT000812			HESTER RD	OXFORD NC 27565	Pamlico
BD00942 PR12729: U2016-1178			19-Jun-1712-Sep-1(CT00174)		3067	SAM MOSS HAYES ROAD	OXFORD NC 27565	Pamlico
BD00499 PR13214 U2009-0984			30-Jun-1(30-Nov-0 CT00002;			SWEET BRIAR LANE	OXFORD NC 27565	Pamlico
BD00542:PR13251{U2010-0595			30-Dec-1(16-Jun-1(CT00066)			SMITH RD	OXFORD NC 2756S	Pamlico
BD00569 PR13279 U2010-1100			18-May-120-Dec-1(CT00020)		3517	HIGHWAY 15	OXFORD NC 27565	Pamlico
	22-Jun-1E22-Jun-1EContractor		0 5-Jan-17 15-Jun-1€ CT000549		3656	HERITAGE ROAD	OXFORD NC 27565	Pamlico
BD00S0S: PR13214, U2010-0060				180900388954	2574	CAROLYN CT	OXFORD NC 27565	Pamlico
BD00896 PR101711U2016-0472		MOBILE HOME		180900393331	2565	SMITH RD	OXFORD NC 27565	Pamlico
BD00625 PR13347(U2012-0013			13-Jun-12 00:00:00 CT00013		2585	CEDAR LANE	OXFORD NC 27565	Pamlieo
BD00638: PR13352; U2012-0260				181200765373	623	LAWRENCE ROAD	WAKE FOREST NC	Neuse
BD00920 PR13619 (U2016-0859			29-Aug-1 11-Apr-1(CT00002;		721	KELSEY WAY		Neuse
BD00920 PR13618(U2016-0860			06-Sep-1:11-Jul-16 CT00002;			KELSEY WAY		Neuse
BD00920 PR13618 U2016-0861			09-Aug-1 11-Jul-16 CT00002;			KELSEY WAY		Neuse
	15-Aug-1:15-Aug-1:Contractor		22-Jun-1701-Aug-1 CT000027		719	KELSEY WAY		Neuse
	25-Aug-1:25-Aug-1:Contractor		29-Aug-1 01-Aug-1 CT00002;		717	KELSEY WAY		Neuse
BD00935;PR13627+U2016-1077			14-Nov-1 01-Aug-1(CT00002)		715	KELSEY WAY		Neuse
BD00830 PR13556(U2015-0645			12-Aug-1: 24-Jun-1: CT000027		3010	BRUCE GARNER RD		Neuse
BD00830 PR13556! U2015-0641			26-May-105-Jun-15CT00002		3014	BRUCE GARNER RD		Neuse
BD00855(PR13577;U2015-1156			07-Jun-1€16-Oct-15CT001345			WILLARD DR		Neuse
BD00843:PR13566;U2015-0928			24-Jun-1626-Aug-1:CT001400			WILLARD DR		Neuse
BD00949: PR13613! U2016-1325			19-Jul-17 11-Oct-1(CT001400			WILLARD DR		Neuse
BD00875: PR13586; U2016-0095			24-Apr-1: 25-Jan-1€ CT001205		657	WILLARD DR		Neuse
	24-Jan-1224-Jan-12Contractor		25-Oct-1223-Jan-12CT000980		3029	EAST BAY		Neuse
BD00675 PR13401(U2012-0998			05-Jul-13 08-Nov-1 CT001150		3031	EAST BAY COURT	CREEDMOOR, NC 27522	Neuse
BD00794-PR13488;U2014-1198			10-Jul-15 21-Nov-1 CT001400		3030	EAST BAY COURT	CREEDMOOR NC 27522	Neuse
BD00968 PR13613! U2017-0014			07-5ep-127-Dec-1(CT001400		3033	EAST BAY CT		Neuse
BD00869 PR13583{ U2015-1384			19-Jul-16 14-Dec-1: CT001400		3032	EAST BAY CT		Neuse
BD00930 PR13613(U2016-0987			19-Jun-1701-Jul-16 CT001400		679	WILLARD DR		Neuse
BD00649 [,] PR13375! U2012-0487			02-Jan-1321-Jun-12CT000972		3034	EAST BAY COURT	CREEDMOOR, NC 27522	Neuse
BD00675 PR13401!U2012-0997			05-Jul-13 08-Nov-1 CT001150		3035	EAST BAY COURT	CREEDMOOR, NC 27522	Neuse
BD00678 PR13407{U2013-0031			17-Oct-1:04-Jan-1: CT000988			WILLARD DRIVE	CREEDMOOR, NC 27522	Neuse
	17-Aug-1:17-Aug-1:Contractor		23-May-116-Aug-1 CT001400		677	WILLARD DR		Neuse
BD00845 PR13571102015-0965			04-Feb-1(01-Sep-1(CT00134)			WILLARD DRIVE		Neuse
BD00902 PR13605(U2016-0570			21-Apr-1:25-Apr-1(CT00134:			WILLARD DR		Neuse
BD00670/PR133965U2012-0889			15-Oct-1: 29-Oct-1: CT001146			WILLARD DRIVE	CREEDMOOR, NC 27522	Neuse
	21-Mar-121-Mar-1 Contractor		17-Nov-1 18-Mar-1 CT00079			WILLARD DRIVE	CREEDMOOR, NC 27522	Neuse
BD00809 PR13542 U2015-0253			29-Sep-1:11-Mar-1 CT00120:			WILLARD DRIVE		Neuse
	14-Aug-1 14-Aug-1 Contractor		21-May-124-Jun-13CT001270		655	WILLARD DRIVE	CREEDMOOR, NC 27522	Neuse
	11-Jun-1/11-Jun-1/Contractor		17-Oct-1/28-May-1CT000988		662	WILLARD DRIVE	CREEDMOOR NC 27522	Neuse
BD00782:PR13521:U2014-0924			2S-Mar-1 16-Sep-1/CT00037/		668	WILLARD DRIVE		Neuse
BD00714.PR13437/U2013-0723			03-Sep-1: 19-Jul-13 CT00037:		656	WILLARD DRIVE	CREEDMOOR, NC 27522	Neuse
	23-Mar-123-Mar-1 Contractor		02-Nov1 22-Mar-1 CT000039			VESTERBY DRIVE	CREEDMOOR, NC 27522	Neuse
BD00713: PR13447(U2013-0703 BD00722(PR13457(U2013-0884			31-Mar-1 19-Jul-13 CT000778			WILLARD DRIVE	CREEDMOOR, NC 27522	Neuse
BD00721PR13437 02013-0884 BD00701 PR13423{U2013-0486			19-Jun-1/10-Sep-1:CT001118			VESTERBY DRIVE	CREEDMOOR NC 27522	Neuse
BD00701.PR13423702013-0486 BD00858:PR135627U2015-1205			17-Sep-1:0S-Apr-1:CT000980			WILLARD DRIVE	CREEDMOOR, NC 27522	Neuse
BD00802: PR13529; U2015-0095			17-May-1 20-Oct-15 CT000374			VESTERBY DR		Neuse
	1 3-Jun-16 13-Jun-16 Contractor		02-Sep-1:22-Jan-15 CT00145			WILLARD DRIVE	CREEDMOOR NC 27522	Neuse
BD00913 PR13608 02016-0747 BD00909 PR13612(U2016-0691			13-Feb-1:02-Jun-1€ CT000374			VESTERBY DRIVE	CREEDMOOR NC 27522	Neuse
BD00903(PR13612(02016-0885			09-Nov-1 21-Apr-1(CT00002; 11-Jul-17 07-Jun-1(CT00002;			BUTTERFLY CIR		Neuse
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BD00933 PR13625(02016-1040 BD00933 PR13625(U2016-1041								Neuse
BD00933 PR13625: 02016-1041 BD00933 PR13626: U2016-1048			17-Apr-1:18-Aug-1:CT00002;			BUTTERFLY CIR		Neuse
BD00933 PR13626 U2016-1048 BD00933 PR13626 U2016-1049			24-Feb-1: 18-Aug-1: CT00002;			BUTTERFLY CIR		Neuse
BD00933(PR13626(02016-1049 BD00937(PR13609(U2016-1090			21-Feb-1: 18-Aug-1: CT00002;			BUTTERFLY CIR		Neuse
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BD00704 PR13440 U2013-0541 BD00881 PR13595 U2016-0220			16-Aug-13 00:00:0(CT000132 30 Aug-1:13-Jap-16 CT000465				OXFORD NC 27565	Pamlico
BD00704/PR13440(U2013-0541 BD00881/PR13595(U2016-0220 BD00919 PR13614(U2016-0848	23-Feb-1(23-Feb-1(Contractor	NEW HOUSE	16-Aug-13 00:00:01 C100013, 30-Aug-1(13-Jan-16 CT000465 12-Apr-1: 14-Jun-16 CT00175;	182400542610	1303	CHAMPION DR EAST BAY COURT	UXFORD NC 27565	Pamlico Neuse Neuse

BD00702' PR13431: U2013-0514 10-Jun-1: 10-Jun-1: Contractor NEW HOUSE BD00671 PR13398:U2012-0916 08-Nov-1 08-Nov-1 Contractor NEW HOUSE BD00770:PR13506;U2014-0679 10-Jul-14 10-Jul-14 Contractor NEW HOUSE BD00788 PR13520{U2014-1070 20-Oct-1/20-Oct-1/Contractor NEW HOUSE BD00623 PR13344 U2011-0947 15-Dec-1 15-Dec-1 Contractor NEW HOUSE BD00822' PR13551/ U2015-0514 26-May-126-May-1 Contractor NEW HOUSE BD00783 PR13521, U2014-0941 22-Sep-1/22-Sep-1/Contractor NEW HOUSE BD00774 PR13473 U2014-0789 05-Aug-1 05-Aug-1 Contractor NEW HOUSE BD00844 PR13571 U2015-0946 31-Aug-1 31-Aug-1 Contractor NEW HOUSE BD00583'PR13302',U2011-0220 05-Apr-1:05-Apr-1: Contractor NEW HOUSE BD00840 PR13564/ U2015-0895 19-Aug-1 19-Aug-1 Contractor NEW HOUSE BD00957: PR13614(U2016-1467 15-Nov-1 15-Nov-1 Contractor NEW HOUSE BD00791 PR13521/U2014-1139 07-Nov-1 07-Nov-1 Owner NEW HOUSE BD00880/PR13574.U2016-0190 17-Feb-1(17-Feb-1)Contractor NEW HOUSE BD00819: PR13553: U2015-0459 11-May-111-May-1Contractor NEW HOUSE BD00625 PR13346! U2012-0015 10-Jan-1210-Jan-12Contractor NEW HOUSE BD00636 PR13360 U2012-0217 23-Mar-123-Mar-1 Contractor NEW HOUSE BD00633; PB13028; U2012-0161 06-Mar-106-Mar-1 Contractor NEW HOUSE BD00616-PR13338:U2011-0805 26-Oct-1126-Oct-11Contractor NEW HOUSE BD00574 PR13262(U2011-0077 14-Feb-1:14-Feb-1: Contractor NEW HOUSE BD00636 PB13359(1)2012-0213 23-Mar-123-Mar-1 Contractor NEW HOUSE BD00620:PR13339!U2011-0890 29-Nov-1 29-Nov-1 Contractor NEW HOUSE BD00661 PR13377 U2012-0718 04-Sep-1/04-Sep-1/Contractor NEW HOUSE BD00948 PR13608 U2016-1310 12-Oct-1f 12-Oct-1f Contractor NEW HOUSE 8D00497 PR13211:U2009-0957 04-Dec-0:04-Dec-0:Owner NEW HOUSE BD00562 PR12984 U2010-0957 02-Nov-1 02-Nov-1 Contractor NEW HOUSE BD00566(PR13285:1/2010-1039 01-Dec-1(01-Dec-1)Contractor NEW HOUSE BD00573 PB13292(1)2011-0064 07-Eeb-1:07-Eeb-1: Contractor NEW HOUSE BD00732 PR13462/ U2013-1104 07-Nov-1 07-Nov-1 Contractor NEW HOUSE BD00732 PR13462(1)2013-1105 07-Nov-1 07-Nov-1 Contractor NEW HOUSE BD00689 PR13420(1)2013-0259 22-Mar-122-Mar-1 Contractor NEW HOUSE BD00617 PR13339 U2011-0830 07-Nov-1 07-Nov-1 Contractor NEW HOUSE BD00626 PR13348(1)2012-0040 18-Jan-1218-Jan-12 Contractor NEW HOUSE BD00528 PR13242: U2010-0372 04-May-104-May-1 Contractor NEW HOUSE BD00584 PR13304: U2011-0224 05-Apr-1:05-Apr-1:Contractor NEW HOUSE BD00555; PR13270^cU2010-0849 28-Sep-1(28-Sep-1(Contractor_NEW HOUSE BD00418 PB13138(112008-0989 21-Nov-0 21-Nov-0 Contractor NEW HOUSE BD00629 PR13352;U2012-0098 08-Feb-1;O8-Feb-1;Contractor NEW HOUSE BD00773 PR13495: U2014-0768 31-Jul-14 31-Jul-14 Owner MOBILE HOME BD01004: PR13662; U2017-0524 05-May-1 05-May-1 Other MOBILE HOME BD00641: PR13242{U2012-0325 20-Apr-1; 20-Apr-1; Other MOBILE HOME BD00450: PR12066! U2009-0332 14-May-C 14-May-C Owner NEW HOUSE BD00806: PR11991{U2015-0180 25-Feb-1!25-Feb-1!Contractor MOBILE HOME BD00555 PR13271 U2010-0845 27-Sep-1 (27-Sep-1 Other MOBILE HOME BD00602 PR13323(U2011-0534 21-Jul-11 21-Jul-11 Other MOBILE HOME BD00627 PR11986: U2012-0052 24-Jan-1224-Jan-12Contractor MOBILE HOME BD00612 PR133334 U2011-0735 03-Oct-1103-Oct-11 Other MOBILE HOME BD01057/PR11918{U2017-1320 21-Nov-1 21-Nov-1 Occupant MOBILE HOME BD00819 PR13553! U2015-0437 04-May-104-May-1 Owner MOBILE HOME BD00829 PR13559 U2015-0626 18-Jun-1518-Jun-15 Contractor NEW HOUSE BD00880 PR13591: U2016-0195 17-Feb-1(17-Feb-1) Contractor MODULAR HOME BD00913 PR13619: U2016-0746 13-Jun-1(Contractor MODULAR HOME BD00371 PR13103;U2008-0500 05-Jun-0EOS-Jun-OEContractor NEW HOUSE BD00635 PR13357; U2012-0191 14-Mar-114-Mar-1 Owner MOBILE HOME BD00700 PR13431(U2013-0469 30-May-130-May-1 Contractor NEW HOUSE BD00728 PR13464{U2013-1013 15-Oct-1:15-Oct-1:Contractor NEW HOUSE 8D00716'PR13452!U2013-0784 08-Aug-1 08-Aug-1 Owner MOBILE HOME BD00582-PR13293! U2011-0097 28-Mar-1 21-Feb-1: Contractor NEW HOUSE BD00S92' PR13293: U2011-0360 25-May-125-May-1Contractor NEW HOUSE

18-Feb-1/08-May-1 CT00051(181300281916 17-Jul-13 06-Nov-1 CT00079; 181300282261 13-Jan-1527-May-1CT000988181300282304 20-Jul-15 15-Oct-14 CT00120! 181300282575 01-Aug-1.08-Dec-1 CT00079 181300285791 04-Dec-1/10-Apr-1/CT00037/181300286198 15-Apr-1!19-5ep-1/CT00037/181300286393 23-Apr-1! 26-Nov-1 CT00037/181300286447 10-Feb-1(11-Aug-1) CT00134-181300287072 30-Nov-1 23-Mar-1 CT00003(181300287733 16-Dec-1:23-Jul-15 CT00163/096900143289 14-Aug-109-Nov-1 CT00140(181300289080 30-Jun-1503-Sep-1/CT00098{181300290361 13-Sep-1(05-Feb-1(CT00037/181300291123 30-Dec-1:22-Apr-1:CT00079:181300293120 19-Jul-12 28-Dec-1 CT00039 181300294055 19-Oct-1; 26-Mar-1 CT00101(181300294902 26-Mar-1 01-Mar-1 CT00003/181300295738 23-Feb-1;26-Oct-1;CT00003(181300296004 13-Dec-1;14-Feb-1; CT00053;181300296178 18-Jul-12 23-Mar-1 CT00101 181300296669 20-Mar-1 17-Nov-1 CT00097;181300297557 15-Mar-1 29-Aug-1 CT00101' 181300297978 30-May-107-Oct-1(CT00037/181300371605 15-Jun-1(30-Nov-0 181300372886 11-Aug-1 22-Oct-1(CT00074(181300376217 01-Jul-11 30-Nov-1 CT00002,08891324517 16-Feb-1;03-Feb-1;CT00003{181300378907 09-Jan-1506-Nov-1 CT00134: 181300380327 10-Aug-1:06-Nov-1 CT00134:181300380600 21-Oct-1: 22-Mar-1 CT00098(181300383640 16-Aug-1 07-Nov-1 CT00048 181300386310 21-Jun-1209-Jan-12CT00098(181300388322 18-Nov-1 29-Apr-1(CT00031, 181300394383 29-Nov-1 31-Mar-1 CT00083(181300470993 23-Feb-1 23-Sep-1(181300474683 28-May-1 14-Nov-0 CT00003(181300481585 08-Jun-1201-Feb-1:CT000778181300491552 18-Mar-15 00:00:0(CT00077, 181300553819 01-Aug-17 00:00:00 181300558937 16-May-12 00:00:0 CT00074, 181300566759 16-Jun-1114-May-C 181300657642 26-May-15 00:00:0 CT00138: 181300675129 22-Nov-10 00:00:00 181300687427 15-Aug-11 00:00:00 CT000812 181300760704 16-Feb-12 00:00:00 CT00013: 181300853529 14-Oct-11 00:00:00 CT00081; 181300873518 15-Dec-17 00:00:00 CT00109: 181300873518 04-Apr-16 00:00:00 181300877509 21-Dec-1:18-Jun-15CT00118(181300952974 15-Jun-1€12-Feb-1(CT00020§181300963142 28-Nov-1 09-Jun-16 00:00:00 181400134238 23-Feb-1(05-Jun-08 00:00:00 181400206137 30-Apr-12 00:00:00 181400215396 26-Nov-1 08-May-1 CT00101(181400320699 28-Mar-114-Oct-1: CT00120: 181400322962 21-Aug-13 00:00:0(CT00013; 181400528617 18-Jun-1; 17-Feb-1; CT00003; 181400843148 17-Nov-1 20-May-1CT00003;181400844090

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BD00998 PR13065: U2017-0436 19-Apr-1: 19-Apr-1: Contractor NEW HOUSE BD00900 PR13607: U2016-0539 27-Apr-1(27-Apr-1(Contractor NEW HOUSE BD00844-PR13568: U2015-0956 01-Sep-1! O1-Sep-1! Contractor NEW HOUSE BD00854: PR13577(U2015-1149 16-Oct-1: 16-Oct-1: Contractor NEW HOUSE BD00877/PR13587; U2016-0126 02-Feb-1(02-Feb-1(Contractor NEW HOUSE BD00822/PR13555/U2015-0511 22-May-122-May-1Contractor NEW HOUSE BD00785(PR13525)U2014-0998 03-Oct-1/03-Oct-1/Contractor NEW HOUSE BD00681 PR13412! U2013-0096 29-Jan-1329-Jan-13 Contractor NEW HOUSE BD00666/PR13367(U2012-0820_03-Oct-1;03-Oct-1;Owner_____MOBILE HOME BD00631 PR12821{U2012-0116 17-Feb-1;17-Feb-1;Contractor NEW HOUSE BD00647 PR13370/U2012-0433 01-Jun-1201-Jun-12 Contractor NEW HOUSE BD00579 PR13299; U2011-0159 14-Mar-1 14-Mar-1 Contractor MODULAR HOME BD01016 PR13654(U2017-0717 22-Jun-1722-Jun-170ther MODULAR HOME BD00770 PR13512;U2014-0677 10-Jul-14 10-Jul-14 Contractor NEW HOUSE BD00575 PR13295(U2011-0094 18-Feb-1:18-Feb-1:Owner MOBILE HOME BD01021' PR13668' U2017-0793 11-Jul-17 11-Jul-17 Owner NEW HOUSE BD00805 PR13536/U2015-0164 20-Feb-1/20-Feb-1/Contractor NEW HOUSE BD00538 PR13241(U2010-0536 22-Jun-1(22-Jun-1(Other MODULAR HOME BD00516 PR13231' U2010-0209 11-Mar-1 11-Mar-1 Other MOBILE HOME BD00765 PR13508; U2014-0570 11-Jun-1/ 11-Jun-1/ Owner MOBILE HOME BD00616 PR13162{U2011-0802 25-Oct-1125-Oct-11Contractor NEW HOUSE BD00724 PR13441 U2013-0931 25-Sep-1: 25-Sep-1: Owner NEW HOUSE BD00764/PR12700, U2014-0560 06-Jun-1/06-Jun-1/ Contractor NEW HOUSE BD00717 PR13449/ U2013-0795 12-Aug-1 12-Aug-1 Contractor NEW HOUSE BD00594 PR10322 U2011-0387 31-May-131-May-1 Owner MOBILE HOME BD00860 PR13586! U2015-1245 06-Nov-1 06-Nov-1 Owner MOBILE HOME BD00674 PR13400; U2012-0978 30-Nov-1 30-Nov-1 Contractor NEW HOUSE BD00553; PR13249(U2010-0820 22-Sep-1(22-Sep-1(Contractor MOBILE HOME BD00957' PR11535: U2016-1473 16-Nov-1 16-Nov-1 Contractor MODULAR HOME BD00557 PR13275 U2010-0878 05-Oct-1(05-Oct-1(Owner MOBILE HOME BD00576(PR13296(U2011-0100 21-Feb-1)21-Feb-1)0 wher MOBILE HOME BD00728 PR13446: U2013-1027 18-Oct-1: 18-Oct-1: Contractor NEW HOUSE BD00793 PR13529 U2014-1185 19-Nov-1 19-Nov-1 Other MOBILE HOME BD00849 PR13578! U2015-1037 18-Sep-1! 18-Sep-1! Owner MOBILE HOME BD00857 PR13583(U2015-1198 28-Oct-1: 28-Oct-1: Other MOBILE HOME BD00641/PR13364:U2012-0318 19-Apr-1; 19-Apr-1; Contractor NEW HOUSE BD00790 PR10360(U2014-1123 04-Nov-1 04-Nov-1 Contractor MODULAR HOME BD00633 PR13356: U2012-0162 06-Mar-1 06-Mar-1 Contractor NEW HOUSE BD00538 PR13251(U2010-0526 21-Jun-1(21-Jun-1(Contractor MOBILE HOME BD00550: PR13264: U2010-0759 30-Aug-1:30-Aug-1: Owner MOBILE HOME BD01000 PR13635: U2017-0465 26-Apr-1; 26-Apr-1; Contractor MOBILE HOME BD01055 PR13683 U2017-1291 15-Nov-1 15-Nov-1 Other MOBILE HOME BD00840 PR13561(U2015-0883 18-Aug-1:18-Aug-1:Contractor NEW HOUSE BD00699 PR13432 U2013-0448 23-May-123-May-1 Contractor NEW HOUSE BD00893: PR13597: U2016-0430 05-Apr-1(05-Apr-1(Contractor NEW HOUSE BD00658: PR13379(U2012-0648 10-Aug-1:10-Aug-1:Contractor NEW HOUSE BD00927 PR13624{U2016-0957 01-Aug-1/0 1-Aug-1/Contractor NEW HOUSE BD00852-PR13565:U2015-1107 06-Oct-1106-Oct-11 Contractor NEW HOUSE BD00779/PR13515: U2014-0875 02-Sep-1/02-Sep-1/Contractor NEW HOUSE BD00633 PR13348 U2012-0160 06-Mar-106-Mar.1 Contractor NEW HOUSE BD00968 PR10273(U2017-0012 04-Jan-1704-Jan-170wner MOBILE HOME BD00864-PR135394U2015-1305 30-Nov-1 30-Nov-1 Contractor NEW HOUSE BD00544 PR13230; U2010-0620 21-Jul-10 21-Jul-10 Owner MOBILE HOME BD01017-PR13646(U2017-0739 28-Jun-1728-Jun-17Contractor NEW HOUSE BD00676 PR134042 U2012-1014 07-Dec-1: 07-Dec-1: Contractor NEW HOUSE BD00733/PR13452{U2013-1125 13-Nov-1 13-Nov-1 Contractor MODULAR HOME BD00749 PR13472(U2014-0272 25-Mar-125-Mar-1 Contractor NEW HOUSE BD00787 PR135111U2014-1042 13-Oct-1/13-Oct-1/Contractor NEW HOUSE BD00519 PR13234{U2010-0257 24-Mar-1 24-Mar-1 Contractor NEW HOUSE

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BLUEBELL LANE	WAKE FOREST NC 27587
BLUEBELL LANE	WAKE FOREST NC 27587
BLUEBELL LANE	WAKE FOREST, NC 27587
LAWRENCE RD	CREEDMOOR NC 27522
LAWRENCE RD	CREEDMOOR NC 27522
BRASSFIELD ROAD	CREEDMOOR NC 27522
WALTERS ROAD	CREEDMOOR NC
ODEAR FARM ROAD	CREEDMOOR
WALTERS ROAD	
	CREEDMOOR, NC 27522
HIGHWAY 56	
WALTERS RD	
ZEBRA LANE	
WALTERS RD	CREEDMOOR NC 27522
ANTLER WAY	CREEDMOOR NC 27522
ANTLER WAY LANE	CREEDMOOR NC 27522
BRAMBLE LANE	CREEDMOOR NC 27522
WALTERS RD	CREEDMOOR NC 27522
WALTERS RD	
HESTER RD	OXFORD, NC 27565
TAR RIVER RD	CREEDMOOR NC 27522
TAR RIVER ROAD	
TAR RIVER RD	CREEDMOOR, NC 27522
HIGHWAY 56	CREEDMOOR NC 27522
TAR RIVER RD	OXFORD NC 27565
TOM HUNT RD	OXFORD NC 27565
TAR RIVER RD	OXFORD NC 27565
TAR RIVER RD	OXFORD NC 27565
TAR RIVER ROAD	
	OXFORD NC 27565
GARNET LN	
GRANVILLE RIDGE RD	
TRAPPERS RUN	WAKE FOREST NC
GRANVILLE WOODS	WAKE FOREST NC 27587
GRANVILLE WOODS	WAKE FOREST NC
WOODLAND NORTH	WAKE FOREST NC 27587
WOODLAND NORTH	WAKE FOREST NC 27587
WOODLAND NORTH	
WOODLAND NORTH RD	WAKE FOREST, NC 27587
PLEASANTS RIDGE RD	
GENESIS LANE	WAKE FOREST, NC 27587
GENESIS LN	
GENESIS DRIVE	WAKE FOREST, NC 27587
GENESIS LN	WARE FOREST, NC27507
GENESIS LN	
GENESIS LN	WAKE FOREST NG 37507
	WAKE FOREST NC 27587
GENISIS DRIVE	WAKE FOREST NC
WOODLAND CHURCH RD	
WOODLAND CHURCH RD	
WOODLAND CHURCH RD	WAKE FOREST NC 27587
WOODLAND CHURCH RD	
WOODLAND CHURCH ROAD	WAKE FOREST NC
WOODLAND CHURCH RD	YOUNGSVILLE, NC 27596
PLEASANTS RIDGE RD.	
WEST STONE DRIVE	
WEST STONE DRIVE	WAKE FOREST NC 27587

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29-Apr-1: 16-Nov-1 CT00003(182300928518 11-Oct-1(20-May-1CT00046'182300929615 28-Aug-1-09-Apr-14 CT00053 182300950075 29-Dec-1: 30-Dec-1: 22-Sep-1: CT00 147: 182300950252 19-Nov-1 19-Jun-14 CT001348182400013978 05-May-119-Jun-05 CT00002, 182400015881 24-Jul-13 19-Mar-1 CT00098(182400019861 24-Jul-13 05-Dec-1 CT00002 182400021519 18-Sep-1:16-Nov-1 CT00157(182400021930 03-Oct-1/10-May1CT00002(182400022337 07-Mar-106-Jul-15 CT00002; 182400023736 09-Jul-14 19-Nov-1 CT00134{182400025166 10-Sep-1: 24-Apr-1: CT00002: 182400026507 03-lun-1502-Sen-1(CT00095)182400027107 06-Jun-1:23-Jan-1:CT00002;182400027843 14-Apr-1(10-Jul-15 CT00002, 182400029023 2 3-Jul-13 0S-Dec-1: CT00002! 182400031265 05-May-112-May-CCT00002;182400033252 11-Jun-1223-Jan-12CT000027182400035165 21-May-106-Feb-1(CT00002, 182400114902 14-Dec-1! 19-Aug-1: CT00002; 182400116278 10-Aug-1:24-Apr-1:CT00002;182400116590 09-Feb-1'23-Oct-1/ CT00002, 182400116648 24-Sep-1/29-Apr-1/CT00002, 182400116707 06-Aug-1 27-Apr-1 CT00002 182400117452 22-Apr-1(25-Mar-0 CT00033(182400891379 27-Jun-1€17-Nov-1 CT000028183600586945 22-Apr-1(23-Nov-1 CT00085(183600586945 15-Jul-15 15-Dec-1/CT00048(082500978417 15-Oct-1430-Jun-14 CT00002; 182400121237 22-Oct-1/08-Jul-14 CT00002;182400121237 20-Nov-1 21-Jul-14 CT00002, 182400121237 03-Feb-1115-Oct-14CT00002182400121237 20-Feb-1!05-Nov-1 CT00002;182400121237 04-Jun-1528-Jan-15CT00002;182400121237 23-Apr-1115-Dec-1(CT00002)182400121237 24-lun-1(29-Mar-1 (T00042:089405293661 21-Oct-1: 19-Aug-1 CT00003(183400035154 27-Sep-1:28-Feb-1:CT00079:181300280040 25-Aug-1-21-Oct-1: CT00019:088603025170 15-Jun-1(24-Jun-05 193100454378 28-Nov-1 03-Mar-1 CT00097, 183600153325 08-Sep-1(03-Mar-1CT00097;183600153325 28-Nov-1 03-Mar-1 CT00097/183600153325 16-Feb-1:02-Sep-1(CT00163:194800484249 18-Apr-16 00:00:00 CT00013 101001351675 15-Nov-1 16-Mar-1 CT00002,088603222436 09-Aug-1 07-Mar-1 CT00003' 182500208885 13-Mar-1 26-Mar-1 CT00053-182500216282 08-Mar-102-Sep-1(CT00001:08880257717 20-Jun-1€04-Nov-1 CT001668 183600586945 06-Jun-1£04-Nov-1 CT00166{183600586945 06-May-106-Nov-1 CT00166{ 183600586945 06-May-106-Nov-1 CT00166[183600586945 07-Jan-16 18-Aug-1' CT00140(183600586945 26-Apr-1(26-Oct-1)CT00140(183600586945 26-Apr-1(26-Oct-1) CT00140(183600586945 14-Jun-1{17-Nov-1 CT00002{183600586945 24-Jan-1714-Jan-16 CT00030: 183600586945

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FAIRPORT ROAD
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YOUNGSVILLE, NC 27596

CREEDMOOR NC 27522

OXFORD NC 27565

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WAKE FOREST NC

WAKE FOREST, NC

BD00909: PR13570(U2016-0680 31-May-131-May-1 Contractor NEW HOUSE BD0096S PR10216:U2016-1589 15-Dec-1(15-Dec-1)Contractor NEW HOUSE BD00965 PR13644! U2016-1590 15-Dec-1(15-Dec-1)Contractor NEW HOUSE BD00965 PR13644(U2016-1591 15-Dec-1(15-Dec-1)Contractor NEW HOUSE BD00965:PR13644;U2016-1592 15-Dec-1(15-Dec-1)Contractor NEW HOUSE BD00964/PR13622.U2016-1577 14-Dec-1/14-Dec-1/Contractor MODULAR HOME BD00463 PR13156(U2009-0499 01-Jul-09 01-Jul-09 Owner NEW HOUSE BD00643(PR13362(U2012-0364 07-May-107-May-1Contractor NEW HOUSE BD00900 PR11552 U2016-0547 28-Apr-1(28-Apr-1(Contractor MOBILE HOME BD00920/ PR13614(U2016-0879 14-Jul-16 14-Jul-16 Contractor NEW HOUSE BD00906 PR10647(U2016-0632 17-May-117-May-1Contractor NEW HOUSE BD00728/PR13450(U2013-1014 15-Oct-1:15-Oct-1: Contractor NEW HOUSE BD00504/PR13219:U2010-0045 13-Jan-1013-Jan-10 Contractor NEW HOUSE BD00500 PR13216(U2009-1009 23-Dec-0:23-Dec-0:Contractor NEW HOUSE BD01016 PR13666 U2017-0720 23-Jun-1723-Jun-17 Contractor NEW HOUSE BD00825 PR13560(U2015-0561 04-Jun-1*04-Jun-1*Contractor NEW HOUSE BD00978 PR13637/U2017-0156 06-Feb-1:06-Feb-1: Contractor NEW HOUSE BD00743 PR13475(U2014-0137 11-Feb-1/11-Feb-1/Contractor NEW HOUSE BD00693 PR13406 U2013-0332 17-Apr-1: 17-Apr-1: Contractor NEW HOUSE BD00718 PR13406 U2013-0824 21-Aug-1 21-Aug-1 Contractor NEW HOUSE BD01016/PR13666{U2017-0729 27-Jun-1727-Jun-17Contractor NEW HOUSE BD00975 PR13640 U2017-0115 01-Feb-1 01-Feb-1 Contractor NEW HOUSE BD00888 PR13437⁽U2016-0323 16-Mar-116-Mar-1 Owner MOBILE HOME BD00897: PR13598(U2016-0490 19-Apr-1(19-Apr-1(Contractor NEW HOUSE BD00508;PR13222;U2010-0104 08-Feb-1(08-Feb-1(Contractor NEW HOUSE BD00838' PR13567, U201S-084S 05-Aug-1:05-Aug-1: Contractor NEW HOUSE BD00823/PR135585U2015-0515 26-May-126-May-1Contractor NEW HOUSE BD00820 PR13557(U201S-0472 13-May-113-May-1Contractor NEW HOUSE BD01054 PR13685(U2017-1261 08-Nov-1 08-Nov-1 Contractor NEW HOUSE BD01033 PR11806 U2017-0967 25-Aug-1 25-Aug-1 Owner MOBILE HOME BD01022-PR13670[U2017-0800 11-Jul-17 11-Jul-17 Contractor MOBILE HOME BD00671;PR13397(U2012-0917 08-Nov-1 08-Nov-1 Contractor NEW HOUSE BD00623 PR13341 U2011-0958 20-Dec-1 20-Dec-1 Contractor NEW HOUSE BD00948 PR13631; U2016-1290 10-Oct-1(10-Oct-1(Contractor NEW HOUSE BD00880 PR13591 U2016-0202 18-Feb-1(18-Feb-1(Contractor NEW HOUSE BD00882/PR13591(U2016-0229 25-Feb-1(25-Feb-1(Contractor NEW HOUSE BD00506: PR13216(U2010-0085 27-Jan-1C 27-Jan-1C Contractor NEW HOUSE BD00686 PR13417 U2013-0203 04-Mar-104-Mar-1 Contractor NEW HOUSE BD00968 PR13644; U2017-0018 05-Jan-1705-Jan-17Contractor NEW HOUSE BD00881 PR13598 U2016-0221 23-Feb-1(23-Feb-1(Contractor NEW HOUSE BD00881/PR13598(U2016-0222 23-Feb-1(23-Feb-1(Contractor NEW HOUSE BD00889 PR13600! U2016-0344 17-Mar-1 17-Mar-1 Contractor NEW HOUSE BD00943(PR13632)U2016-1199 21-Sep-1(21-Sep-1(Contractor NEW HOUSE BD00985 PR13649(U2017-0278 06-Mar-106-Mar-1 Contractor NEW HOUSE BD00956; PR13633(U2016-1451 10-Nov-110-Nov-1 Contractor NEW HOUSE BD01028'PR13674(U2017-0901 07-Aug-1 07-Aug-1 Contractor NEW HOUSE BD01029i PR13674; U2017-0902 07-Aug-1 07-Aug-1 Contractor NEW HOUSE BD01050 PR13677: U2017-1195 23-Oct-1723-Oct-17 Contractor NEW HOUSE BD00982' PR13649! U2017-0234 23-Feb-1:23-Feb-1: Contractor NEW HOUSE BD01049 PR13605 U2017-1186 20-Oct-1 20-Oct-1 Contractor NEW HOUSE BD01046 PR13677;U2017-1143 11-Oct-1711-Oct-17Contractor NEW HOUSE BD00937'PR13628; U2016-1101 30-Aug-1: 30-Aug-1: Contractor NEW HOUSE BD01029; PR13673/ U2017-0914 09-Aug-1 09-Aug-1 Contractor NEW HOUSE BD00682 PR13412{ U2013-0118 05-Feb-1; 05-Feb-1; Contractor NEW HOUSE BD00800 PR13533/U2015-0038 16-Jan-1516-Jan-15Contractor NEW HOUSE BD00792; PR13533; U2014-1168 17-Nov-1 17-Nov-1 Contractor NEW HOUSE BD01080.PR11678(U2018-0248 15-Mar-1 15-Mar-1 Owner MOBILE HOME BD00866 PR13589: U2015-1336 03-Dec-1! 03-Dec-1! Owner MOBILE HOME BD00696 PR13422(U2013-0385 02-May-102-May-1Owner MOBILE HOME

31-Oct-1(20-May-1CT00002)183600586945 31-May-114-Dec-1(CT00001:088913131361 31-May-114-Dec-1(CT00001,088913131361 31-May-114-Dec-1(CT00001;088913131361 31-May-114-Dec-1(CT00001,088913131361 21-Apr-1:07-Dec-1(CT00041{003027570001 182814249275 20-Apr-1(29-Jun-05 26-Sep-1207-May-1 CT000535190200967387 18-May-16 00:00:0 CT00081; 183600282632 (NEW LOT) 03-Nov-1 11-May-1 CT00143, 182900255501 21-Dec-1(12-May-1 CT00001(193402695953 04-Feb-1!15-Oct-1: CT00117(182500960957 30-Mar-1 13-Jan-1(CT00001: 0991004505526 23-Jun-1(23-Dec-0! 099104510045 02-Nov-1 06-Apr-1. CT00002. 182400125835 20-Oct-1*04-lun-1*CT00002-182400126178 20-Oct-1,06-Feb-1,CT00002,182400126415 07-Jul-14 10-Feb-1/ CT00002, 182400128018 31-Jul-13 16-Apr-1: CT00002, 182400131090 27-Nov-1 21-Aug-1 CT00002,182400132216 26-Oct-1, 12-Jun-1, CT00002, 182400136053 25-Oct-1, 01-Feb-1, CT00002, 182400139094 08-Mar-17 00:00:00 CT00153: 182400164143 10-Apr-1(10-Apr-1)18-Apr-1(CT00120-183600153325 07-Sep-1(22-Jan-10 181300288887 08-Dec-1'23-Jul-15 CT00002 182400214583 08-Sep-1!26-May-1CT00002,182400223107 10-Sep-1!13-May-1CT00002,182400224280 05-Apr-1/03-Nov-1 CT00073* 191313746890 28-Nov-17 00:00:0(CT00063; 182400259527 30-Aug-17 00:00:0(CT00081; 182400267105 31-May-105-Nov-1 CT00003(182400286804 19-Apr-1, 20-Dec-1 CT00053: 182400294630 02-May-126-Sep-1(CT00134:182400347732 02-Sep-1(05-Feb-1(CT00143)182400351581 04-Aug-1:05-Feb-1(CT00143:182400351664 02-Jul-10 25-Jan-1C CT00043(182400391910 27-Jun-1:01-Mar-1 CT00120*182400405207 14-Jul-17 30-Dec-1(CT000465182400435907 15-Feb-1:28-Jan-1ECT00134:182400440339 15-Mar-1 28-Jan-1ECT00134-182400440796 15-Nov-1 22-Feb-1(CT00046!182400443435 21-Apr-1:06-Sep-1(CT00046:182400443716 12-Sep-1:02-Mar-1 CT00046 182400446940 21-Apr-1:07-Nov-1 CT00134: 182400447379 04-Dec-1 04-Aug-1 CT00073 191315745878 04-Dec-1 04-Aug-1 CT00073 191315745878 13-Apr-1(27-Sep-1) CT00046* 182400545164 03-Nov-1 17-Feb-1: CT00046! 182400545798 09-Apr-1{17-Oct-1;CT00134:182400546412 09-May-127-Sep-1 CT00046* 182400641933 27-Mar-1 09-Aug-1 CT00046! 182400642528 26-Mar-107-Aug-1 CT00198; 182400650303 23-Jul-13 28-Jan-13 CT00098(182400691666 01-Sep-1:02-Jan-15 CT00018(182400757872 25-Aug-1 04-Nov-1 CT00085(182400767150 24-May-18 00:00:00 182400785248 05-Apr-16 00:00:00 CT00013 182400795059 25-Jun-13 00:00:00 CT00063; 182400795419

2454		
2454	GOLDEN FOREST DRIVE	FRANKLINTON NC
100-D	GOOCH STREET	STEM NC 27581
100-C	GOOCH STREET	STEM NC 27581
100-B	GOOCH STREET	STEM NC 27581
100-A	GOOCH STREET	STEM NC 27581
5061	GOOCHES MILL ROAD	OXFORD NC 27565
8088	GRASSY CREEK RD	OXFORD NC 27565
2992	HALLIE BURNETTE ROAD	OXFORD NC 27565
4045	HIGHWAY 56	FRANKLINTON NC 27525
3605	HIGHWAY 96	OXFORD NC 27565
6210	HUNTSBORO RD	OXFORD NC 27565
	IRONWOOD DR	FRANKLINTON, NC 27525
2208	IRVIN STREET	OXFORD NC 27565
2217	IRVIN STREET	OXFORD NC 27565
1044	BUTTERFLY CIR	
1028	BLUE BELL LN	
1041	BUTTERFLY CIR	
3521	DAISY LANE	WAKE FOREST, NC 27587
3526	LAVENDER LANE	WAKE FOREST, NC 27587
3527	LAVENDER LANE	WAKE FOREST, NC 27587
3532	LAVENDER LN	
3536	LAVENDER LN	
3530	BRUCE GARNER RD	WAKE FOREST, NC 27587
3697	JADE LANE	FRANKLINTON NC
682	JULIETTE COURT	CREEDMOOR NC 27522
1016	BLUEBELL LN	
3527	DAISY LN	
3529		
218		OVEODD NG 37565
	KEENELAND DRIVE	OXFORD NC 27565
1112	ALLENWOOD RD	
1121	ALLENWOOD	
1178	SMITH CREEK WAY	WAKE FOREST, NC 27587
3586	CREEKSTONE WAY	
1301	CHAMPION DR	
3580	GRAHAM SHERRON RD	
3576	GRAHAM SHERRON RD	
1198	SMITH CREEK WAY	WAKE FOREST NC 27587
3695	GRAHAM SHERRON RD	WAKE FOREST, NC 27587
3705	DILLARD LN	
3700	DILLARD LN	WAKE FOREST NC 27587
1305	CHAMPION DR	
3701	DILLARD LANE	
1307	CHAMPION DR	
1311	CHAMPION DR	
1312	CHAMPION DR	
320	KEENELAND DRIVE	OXFORD NC 27565
316	KEENELAND DRIVE	OXFORD NC 27565
3836	PICKETT COURT	
1322	CHAMPION DR	
3834	PICKETTCT	
3827	PICKETT COURT	
3831	PICKETTCT	
3821	PICKETTCT	
1501	ANTERRA DRIVE	WAKE FOREST NC 27587
1148	WOODLAND CHURCH ROAD	WAKE FOREST NC 27587 WAKE FOREST, NC 27587
1148	WOODLAND CHURCH ROAD	
1154		WAKE FOREST, NC 27587
	WOODLAND CHURCH RD	
1208 3652	WOODLAND CHURCH RD BRUCE GARNER RD	WAKE FOREST NG 23523
3032	DRUCE GARNER RU	WAKE FOREST, NC 27587

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BD00607 PR13328(U2011-0626 19-Aug-1 19-Aug-1 Contractor NEW HOUSE BD00461 PR13178: U2009-0469 24-Jun-05 2 4-Jun-05 Contractor NEW HOUSE BD00762 PR13496:U2014-0517 20-May-120-May-1Contractor NEW HOUSE BD00981/PR13651{U2017-0207 17-Feb-1117-Feb-11Contractor NEW HOUSE BD00955 PR136278 U2016-1435 07-Nov-1 07-Nov-1 Contractor NEW HOUSE BD00596(PR13315(U2011-0433 14-Jun-1114-Jun-11Contractor NEW HOUSE BD00518/PR13233112010-0249 23-Mar-123-Mar-1 Contractor NEW HOUSE BD00533 PR13248 U2010-0466 03-Jun-1(03-Jun-1(Contractor NEW HOUSE BD01054 PR13685: U2017-1260 08-Nov-1 08-Nov-1 Contractor NEW HOUSE BD00513/PR13228; U2010-0174 02-Mar-102-Mar-1 Contractor NEW HOUSE BD00589 PR13309(U2011-0306 06-May-106-May-1 Contractor NEW HOUSE BD00535 PR13249 U2010-0490 09-Jun-1(09-Jun-1(Contractor NEW HOUSE BD00564 PR13278 U2010-1009 17-Nov-1 17-Nov-1 Contractor NEW HOUSE BD00564/PR13278/U2010-1008 17-Nov-1 17-Nov-1 Contractor NEW HOUSE BD00535 PR13249(U2010-0488 09-Jun-1(09-Jun-1(Contractor NEW HOUSE BD00653; PR13376/1/2012-0553 16.lul-12 16-lul-12 Contractor NEW HOUSE BD00694: PR13420{U2013-0350 22-Apr-1:22-Apr-1: Contractor NEW HOUSE BD00797 PR13533 U2014-1286 16-Dec-1-16-Dec-1-Contractor NEW HOUSE BD00957 PR13634 U2016-1462 15-Nov-1 15-Nov-1 Contractor NEW HOUSE BD00690 PR13420(112013-0276 26-Mar-126-Mar-1 Contractor NEW HOUSE BD00812 PR13535! U201S-0305 27-Mar-1 30-Mar-1 Contractor NEW HOUSE BD00710 PR13424(U2013-0650 03-Jul-13 03-Jul-13 Contractor NEW HOUSE BD00882 PR135915112016-0239 26-Feb-1626-Feb-16 Contractor NEW HOUSE BD00863; PR13582; U2015-1287 19-Nov-1 19-Nov-1 Contractor NEW HOUSE BD00797: PR13527! U2014-1287 16-Dec-1:16-Dec-1: Contractor NEW HOUSE BD00760 PR13493(U2014-0470 09-May-109-May-1Contractor NEW HOUSE BD00776/PR13516!U2014-0820 13-Aug-1-13-Aug-1-Contractor NEW HOUSE BD00738 PR13476 U2013-1268 31-Dec-1 31-Dec-1 Contractor NEW HOUSE BD00812'PR13542(U2015-0316 01-Apr-1'01-Apr-1'Contractor NEW HOUSE BD00652 PR13378: U2012-0529 06-Jul-12 06-Jul-12 Contractor NEW HOUSE BD00652i PR13377' U2012-0530 06-Jul-12 06-Jul-12 Contractor NEW HOUSE BD00920 PR12691(U2016-0865 13-Jul-16 13-Jul-16 Owner MOBILE HOME BD00699; PR13432! U2013-0456 24-May-124-May-1 Contractor NEW HOUSE BD01033 PR13675 U2017-0969 28-Aug-1 28-Aug-1 Contractor NEW HOUSE BD01013 PR13664: U2017-0677 15-Jun-1715-Jun-17 Contractor NEW HOUSE BD00639 PR13358 U2012-0292 12-Apr-1, 12-Apr-1, Contractor NEW HOUSE BD00582(PR13299(U2011-0191 23-Mar-123-Mar-1 Contractor NEW HOUSE BD00643 PR13356(U2012-0354 02-May-102-May-1 Contractor NEW HOUSE BD00991 PR13614: U2017-0355 27-Mar-127-Mar-1 Contractor NEW HOUSE BD00844!PR13571(U2015-0962 02-Sep-1!02-Sep-1!Contractor NEW HOUSE BD00837(PR13568; U2015-0818 30-Jul-15 3 0-Jul-15 Contractor NEW HOUSE BD00854 PR13573 U2015-1134 13-Oct-113-Oct-11 Contractor NEW HOUSE BD00882 PR13592 U2016-0243 26-Feb-1(26-Feb-1(Contractor NEW HOUSE BD00776/PR13511; U2014-0810 12-Aug-1-12-Aug-1 Contractor NEW HOUSE BD00882: PR13592: U2016-0244 26-Eeb-1(26-Eeb-1(Contractor NEW HOUSE BD00837 PR13568(U2015-0817 30-Jul-15 30-Jul-15 Contractor NEW HOUSE BD00872(PR13573: U2016-0038 11-Jan-1£11-Jan-1£Contractor NEW HOUSE BD00678 PR13406/ U2013-0019 07-Jan-1307-Jan-13Contractor NEW HOUSE BD00678 PR13408(U2013-0018 07-Jan-1307-Jan-13Contractor NEW HOUSE BD00888 PR13606. U2016-0331 16-Mar-116-Mar-1 Contractor NEW HOUSE BD00459'PR13177(U2009-0452 22-Jun-0522-Jun-05Contractor NEW HOUSE BD00486 PR13195{U2009-0818 07-Oct-0{07-Oct-0{Contractor NEW HOUSE BD00556' PR13272(U2010-0864 01-Oct-1(01-Oct-1(Contractor NEW HOUSE BD00926/PR13616(U2016-0945 27-Jul-16 27-Jul-16 Contractor NEW HOUSE BD00856/PR13547;U2015-1180 23-Oct-1523-Oct-15Contractor NEW HOUSE BD00596 PR13303(U2011-0418 08-Jun-1108-Jun-11Contractor NEW HOUSE BD00786 PR135255 U2014-1019 08-Oct-1/ 08-Oct-1/ Contractor NEW HOUSE BD00583: PR13303! U2011-0221 05-Apr-1: 0S-Apr-1: Contractor NEW HOUSE BD00786/PR13526/U2014-1024 08-Oct-1/08-Oct-1/Contractor NEW HOUSE

17-Nov-1 19-Aug-1 CT000028 182400798684 29-Mar-10.00/00/00 182400824045 22-Jun-1520-May1CT00003(182400828459 13-5ep-1:16-Feb-1:CT00018(182400863235 25-Aug-1 02-Nov1 CT00143: 182400867782 18-Aug-1 10-Jun-11CT00089/182400883660 28-May-123-Mar-1 CT00003 182400887664 30-Aug-1(26-May1CT00033(182400891001 12-Feb-1(03-Nov-1 CT00073' 191316778625 22-Jun-1(26-Feb-1(CT00033' 182400891751 16-Aug-1 02-May-1CT00085(182400895079 30-Mar-1 03-Jun-1(CT00033(182400897080 15-Mar-117-Nov-1 CT000028182400897403 04-Mar-1 17-Nov1 CT000028 182400898274 26-Apr-1:03-Jun-1(CT00033! 182400899073 03-Dec-1:12-Jul-12 CT00003:182400919474 03-Jul-14 19-Apr-1: CT00003(182400923509 26-Jan-1616-Dec-1-CT00003(182400923767 25-Aug-1 10-Nov-1 CT00003(182400924962 03-Jui-14 26-Mar-1 CT00003(182400926266 12-Sep-1: 27-Mar-1 CT00003(182400927743 26-Feb-1(05-Apr-1) CT00003(182400933480 22-Sep-1:12-Feb-1(CT00003(182400935084 03-Oct-1(19-Nov-1 CT00003(182400937123 03-Sep-1!05-Nov1 CT00003(182400938178 29-Oct-1/07-May-1 CT00031, 182400941914 16-Feb-1' 31-Jul-14 CT00003(182400942341 28-Aug-1, 27-Dec-1, CT00003(182400974252 13-Jan-1623-Mar-1 CT00085(182400981857 18-Mar-106-Jul-12 CT00002/182400990179 18-Mar-106-Jul-12 CT00002/182400992062 07-Nov-17 00:00:0(CT00063; 182400997852 03-Apr-1/14-May-1 CT00003/182500091877 04Jun-1814-Aug-1 CT00140(182500105727 28-Mar-107-Jun-17CT00140(182500106647 15-Jan-1304-Apr-12 CT00053: 182500107809 25-Aug-1 10-Mar-1 CT00003(182500109390 17-Sep-1;27-Apr-1;CT00053:182500109511 10-May-124-Mar-1CT00140(182500113232 21-Nov-1 01-Sep-1! CT00158(182500113318 13-Apr-1(29-Jul-15 CT00077(182500115529 04-Nov-1 24-Sep-1! CT00053: 182500116762 28-Oct-1(25-Jan-1(CT00077)182500117452 19-Nov-1 07-Jul-14 CT000335182500118161 03-Nov-1 2 1-Jan-16 CT000778 182500118466 2 1-Apr-1(29-Jul-15 CT00077(182500118803 15-Dec-1(07-Jan-16 CT000S3: 182500119569 27-lun-1717-Dec-1: CT00003(182500200131 19-Jun-1: 02-Jan-1: CT00003! 182500201458 20-Dec-1'08-Mar-1 CT00053: 182500204164 09-Jun-1(03-Jun-05 CT00053: 182500205634 10-Mar-102-Oct-0 CT00003 182500205634 06-Apr-1: 27-Sep-1(CT00053: 182500205825 01-May-118-Jul-16 CT000038 182500207451 20-Jul-16 22-Oct-1; CT00140(182500207615 09-Nov-1 08-Jun-11CT00053: 182500208227 29-Jul-15 08-Oct-14 CT00001:0888014564504 13-Feb-1:04-Apr-1: CT00053: 182500209123 07-Jul-15 08-Oct-1/ CT00001;088801464188

COLERIDGE CT	FRANKLINTON NC
WOODLAND CHURCH RD	YOUNGSVILLE NC 27596
SPRINGFIELD TRAIL	YOUNGSVILLE, NC 27596
WOODLAND CHURCH RD	
WOODLAND CHURCH RD	
BAYVIEW COURT	
BAYVIEW COURT	FRANKLINTON NC 27525
COLERIDGE COURT	FRANKLINTON NC 27525
KEENELAND DRIVE	OXFORD NC 27565
COLERIDGE COURT	FRANKLINTON NC 27525
BAYVIEW COURT	FRANKLINTON NC 27525
BAYVIEW COURT	FRANKLINTON NC 27525
BRUCE GARNER RD	FRANKLINTON NC
BRUCE GARNER RD	FRANKLINTON NC
BAYVIEW COURT	FRANKLINTON NC 27525
CASHMERE LANE	YOUNGSVILLE, NC 27596
DOVEFIELD DRIVE	YOUNGSVILLE, NC 27596
DOVEFIELD LANE	YOUNGSVILLE NC 27596
DOVEFIELD LN	
SPRINGFIELD TRAIL	YOUNGSVILLE NC 27596
DOVEFIELD LANE	
WOODLAND CHURCH RD	WAKE FOREST, NC 27587
DOVEFIELD LN	
DOVEFIELD LN	
DOVEFIELD LANE	
RODINSON LANE	WAKE FOREST, NC 27587
WOODLAND CHURCH RD	WAKE FOREST NC 27587
EVENSONG COURT	YOUNGSVILLE, NC 27596
BAYVIEW COURT	
BAYVIEW CT BAYVIEW COURT	FRANKLINTON NC 27525
	FRANKLINTON, NC 27525
POCOMOKE I DRIVE BRASSFIELD ROAD	FRANKLINTON NC 27525 CREEDMOOR, NC 27522
NORA CT	CREEDWOOR, NC 27322
NORA CT	
OLD STILL WAY	WAKE FOREST, NC 27587
COTTON FIELD CT	WAKE FOREST NC 27587
OLD STILL WAY	WAKE FOREST, NC
ROGERS FARM RD	WARE FOREST, NC
ROGERS FARM ROAD	
ROGERS FARM ROAD	
ROGERS FARM RD	
ROGERS FARM RD	
OLD STILL WAY	
ROGERS FARM RD	
ROGERS FARM ROAD	
ROGERS FARM RD	
COTTON FIELD COURT	WAKE FOREST, NC 27587
COTTON FIELD CT	WAKE FOREST, NC 27587
ARBOR PLACE	
COTTON FIELD CT	WAKE FOREST NC 27587
ARBOR PLACE	WAKE FOREST NC 27587
COTTONFIELD COURT	
GARNER TERRACE WAY	
GARNER TERRACE WAY	
GARNER TERRACE WAY	
	STEM NC 27581
KINLOSS WAY	
KINLOSS WAY GARNER TERRACE WAY	WAKE FOREST NC

1207

1053

3977

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BD01004: PR13659; U2017-0527 05-May-105-May-1 Contractor NEW HOUSE BD00878 PR13594(U2016-0142 05-Feb-1(05-Feb-1(Contractor NEW HOUSE BD00859 PR13573: U2015-1232 03-Nov-1 03-Nov-1 Contractor NEW HOUSE BD00512 PR13225 U2010-0160 24-Feb-1(24-Feb-1(Contractor NEW HOUSE BD00848;PR13572;U2015-1034 18-Sep-1!18-Sep-1!Contractor NEW HOUSE BD00854 PR13574(U2015-1133 13-Oct-1(13-Oct-1)Contractor NEW HOUSE BD00467 PR13180 U2009-0549 23-Jul-09 23-Jul-09 Contractor NEW HOUSE BD00870 PR13S91⁺U2015-1403 30-Dec-1⁺30-Dec-1⁺Contractor NEW HOUSE BD00767/PR13S05; U2014-0619 26-Jun-1/26-Jun-1/Contractor NEW HOUSE BD00756/PR13498;U2014-0398 24-Apr-1/24-Apr-1/Contractor NEW HOUSE BD00671(PR13396:1/2012-0907 07-Nov-1 07-Nov-1 Contractor NEW HOUSE BD00671 PR13397; U2012-0908 07-Nov-1 07-Nov-1 Contractor NEW HOUSE BD00671/PR13397/U2012-0909 07-Nov-1 07-Nov-1 Contractor NEW HOUSE BD00671/PR13398(U2012-0911 07-Nov-107-Nov-1 Contractor NEW HOUSE BD00889; PR13599! U2016-0351 18-Mar-1 18-Mar-1 Contractor NEW HOUSE BD00908: PR13609/ U2016-0664 25-May-125-May-1Contractor NEW HOUSE BD00917: PR13609: U2016-0809 28-Jun-1(28-Jun-1) Contractor NEW HOUSE BD00931/PR13625/U2016-1026 16-Aug-1/16-Aug-1/Contractor NEW HOUSE BD00933/PR13625!U2016-1038 18-Aug-1/18-Aug-1/Contractor NEW HOUSE BD00933 PR13625(U2016-1039 18-Aug-1:18-Aug-1:Contractor NEW HOUSE BD01030 PR13675(U2017-0925 15-Aug-1 15-Aug-1 Contractor NEW HOUSE BD00873 PR13594(U2016-0063 14-Jan-1614-Jan-16 Contractor MOD ULAR HOME BD00595 PR13313 U2011-0396 02-Jun-1102-Jun-11Contractor NEW HOUSE BD00739 PR13473(U2014-0021 07-Jan-1407-Jan-14Owner NEW HOUSE BD00808 PR13544! U2015-0241 17-Mar-1 17-Mar-1 Contractor NEW HOUSE BD00759 PR13497 U2014-0457 07-May-107-May-1 Contractor NEW HOUSE BD00742: PR13478; U2014-0126 07-Feb-1+07-Feb-1+Contractor NEW HOUSE BD00844: PR13570(U2015-0961 02-Sep-1!02-Sep-1!Contractor NEW HOUSE BD00869; PR13589; U2015-1392 21-Dec-1; 21-Dec-1; Contractor NEW HOUSE BD00872 PR13588: U2016-0039 11-Jan-1€11-Jan-1€ Contractor NEW HOUSE BD00867(PR13588(1)2015-1357 11-Dec-1'11-Dec-1'Contractor NEW HOUSE BD00854 PR13573(U2015-1135 13-Oct-1:13-Oct-1: Contractor NEW HOUSE BD00866(PR13577)1/2015-1343 07-Dec-1/07-Dec-1/Contractor NEW HOUSE BD00879 PR13593 U2016-0176 12-Feb-1(12-Feb-1(Contractor NEW HOUSE BD00895 PR13599{ U2016-0465 13-Apr-1(13-Apr-1(Contractor NEW HOUSE BD00808/PR13544/U2015-0240 17-Mar-117-Mar-1 Contractor NEW HOUSE BD00739 PR13477 U2014-0025 09-Jan-1409-Jan-14 Contractor NEW HOUSE BD00913 PR13607(U2016-0745 13-Jun-1(13-Jun-1) Contractor NEW HOUSE BD00935 PR13623 U2016-1075 24Aug-1 24-Aug-1 Contractor NEW HOUSE BD00871: PR13591/U2016-0037 08-Jan-1£08-Jan-1£Contractor NEW HOUSE BD00976 PR13648(U2017-0139 03-Feb-1:03-Feb-1:Contractor NEW HOUSE BD00880' PR13593(U2016-0214 22-Feb-1(22-Feb-1(Contractor NEW HOUSE BD00853 PR13573(U2015-1121 09-Oct-1:09-Oct-1: Contractor NEW HOUSE BD00738' PR13467(U2014-0015 06-Jan-1406-Jan-14 Contractor NEW HOUSE BD00621(PR13343) U2011-0906 02-Dec-1 02-Dec-1 Contractor NEW HOUSE BD00776 PR13514 U2014-0814 13-Aug-1 13-Aug-1 Contractor NEW HOUSE BD00793 PR13528{ U2014-1187 19-Nov-1 19-Nov-1 Contractor NEW HOUSE BD00745/PR13482; U2014-0190 28-Feb-1(03-Mar-1 Contractor NEW HOUSE BD00767 PR135054 U2014-0620 26-Jun-14 26-Jun-14 Contractor NEW HOUSE BD00774: PR13512/U2014-0786 04-Aug-1-04-Aug-1-Contractor NEW HOUSE BD00843: PR13548(U2015-0935 27-Aug-1'27-Aug-1'Contractor NEW HOUSE BD00734:PR13466(U2013-1144 19-Nov-1 19-Nov-1 Contractor NEW HOUSE BD00924: PR13621; U2016-0926 26-Jul-16 26-Jul-16 Contractor NEW HOUSE BD00780: PR13519(U2014-0890 0S-Sep-1/05-Sep-1/ Contractor NEW HOUSE BD00759 PR13497(U2014-0456 07-May-107-May-1Contractor NEW HOUSE BD00869' PR13590: U2015-1391 21-Dec-1! 21-Dec-1! Contractor NEW HOUSE BD00830' PR135S9;U2015-0666 26-Jun-15 Contractor NEW HOUSE BD00809 PR13546(U2015-0254 20-Mar-120-Mar-1 Contractor NEW HOUSE BD00956 PR13634(U2016-1440 08-Nov-108-Nov-1 Contractor NEW HOUSE

25-Oct-1;04-May-1CT00003{182500210484 24-Apr-1: 11-Jap-1f CT00003(182500210945 23-Jan-1729-Oct-11 CT00053: 182500211783 18-Jun-1(19-Feb-1(CT00003(182500212220 16-Jun-1(14-Aug-1)CT00077(182500213673 02-Aug-1:24-Sep-1:CT00082:182500213871 15-Mar-121-Jul-09 CT00048(182500214010 26-Oct-1(14-Dec-1) CT00003(182500214533 08-Apr-1: 25-Jun-14 CT00053: 182500215986 10-Apr-1: 17-Apr-1: CT00140(181300377251 24-Apr-1:01-Nov-1 CT00002; 182400121237 02-Jul-13 01-Nov-1 CT00002; 182400121237 22-Mar-101-Nov-1 CT00002;182400121237 24-Apr-1:07-Nov-1 CT00002;182400121237 27-Sep-1(18-Mar-1 CT00002;182400121237 03-Nov-1 25-May-1 CT00002; 182400121237 17-Jan-1705-Apr-1(CT00002;182400121237 28-Dec-1(05-Aug-1)CT00002,182400121237 30-Mar-1 18-Aug-1 CT00002 182400121237 08-May-118-Aug-1 CT00002;182400121237 18-Dec-1 10-Aug-1 (T00002, 182400212030 01-Jul-16 06-Jan-16 CT00165(190800836333 26-Oct-1102-Jun-11CT00003(182500217105 21-Aug-1/02-Dec-1 CT00010 182500217662 09-Oct-1:23-Feb-1:CT00003:182500218500 02-Feb-1:14-Apr-1: CT00077:182500219410 09-Mar-107-Jan-14CT00003(182500219987 27-Jul-16 01-Sep-11 CT00158(182500222041 29-Jun-1E02-Dec-1!CT00114E182500222586 08-Aug-1:08-Jan-16CT00053-182500222824 06-Mar-1 25-Nov-1 CT00067; 182500223340 05-Jul-16 24-Sep-1! CT00053: 182500224141 18-May-104-Dec-1!CT00053:182500225505 12-Dec-1(05-Jan-1ECT00003(182500226317 01-Feb-1: 30-Mar-1 CT00173: 182500226686 16-Oct-1:23-Feb-1:CT00003:182500228108 10-Feb-1:06-Jan-14CT00003:182500229049 05-Apr-1:14-Apr-1(CT00173:182500231170 17-Apr-1, 17-Aug-1, CT00140(182500233182 31-Aug-1:14-Dec-1!CT00003!182500233496 05-5ep-1:25-Jan-17CT00158(182500235471 29-lun-1705-lan-1f CT00003(182500238219 16-Mar-107-Oct-1! CT00053: 182500239051 23-May-10S-Dec-1: CT00053: 182500300556 23-Apr-1, 30-Nov-1 CT00003 182500301269 04-May-125-Jul-14 CT00053: 182500302772 15-May-110-Nov-1 CT00053;182500305912 27-Aug-1 10-Feb-1 CT00003 182500307981 25-Feb-1!26-Jun-1/CT00053:182500310089 26-Mar-111-Jul-14 CT00003 182500310219 19-Oct-1{ 27-Mar-1 CT00003 1825003 10840 03-Sep-1/29-Oct-1: CT00053: 182500312399 21-Jun-1712-Jui-16 CT00053 182500312868 14-Apr-1:15-Aug-1-CT00003:182500314732 02-Feb-1: 14-Apr-1/ CT00077! 182500315273 07-Feb-1:04-Dec-1!CT00114(182500317605 08-Mar-1 26-May-1 CT00158(182500319063 16-Oct-1:06-Mar-1 CT00077! 182500319625 25-Apr-1:02-Nov-1 CT00173: 182500320558

GARNER TERRACE WAY	
ROGERS FARM RD	WAKE FOREST NG 37507
ROGERS FARM RD	WAKE FOREST NC 27587
OLD STILL WAY	WAKE FOREST NC 27587
GARNER TERRACE WAY	
ROGERS FARM RD	
COTTON FIELD CT	WAKE FOREST NC 27587
GARNER TERRACE WAY	
BRAGG VALLEY LANE	WAKE FOREST, NC 27587
KROGEN PLACE	CREEDMOOR, NC 27522
LAVENDER LANE	WAKE FOREST, NC 27587
LAVENDER LANE	WAKE FOREST, NC 27587
LAVENDER LANE	WAKE FOREST, NC 27587
LAVENDER LANE	WAKE FOREST NC 27587
LAVENDER LN	
LILAC LN	
LITTLE MOUNTAIN CREEK ROAD	OXFORD NC 27565
GARNER TERRACE WAY	YOUNGSVILLE NC
GARNER TERRACE WAY BRAGG VALLEY LANE	
	WAKE FOREST, NC 27587
BRAGG VALLEY LANE	WAKE FOREST NC 27587
BRAGG VALLEY LANE	WAKE FOREST, NC 27587
BRAGG VALLEY LANE	WAKE FOREST, NC 27587
ROGERS FARM ROAD	
BRAGG VALLEY LN	
BRAGG VALLEY LANE	
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BRAGG VALLEY LANE	
BRAGG VALLEY LN	
ROGERS FARM RD	
ROGERS FARM ROAD	WAKE FOREST NC 27587
BRAGG VALLEY LANE	WAKE FOREST, NC 27587
BRAGG VALLEY LN	
BRAGG VALLEY LN	
BRAGG VALLEY LN	
ROGERS FARM RD	
ROGERS FARM RD	
ROGERS FARM RD	
	WAKE FOREST NG 33593
GARNER TERRACE WAY	WAKE FOREST, NC 27587
GARNER TERRACE WAY	WAKE FOREST NC
NEW GRISSOM WAY	WAKE FOREST, NC 27587
BRAGG VALLEY LANE	WAKE FOREST NC 27587
BRAGG VALLEY LANE	WAKE FOREST, NC 27587
NEW GRISSOM WAY	WAKE FOREST, NC 27587
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BRAGG VALLEY LANE	
NEW GRISSOM WAY	WAKE FOREST, NC 27587
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NEW GRISSOM WAY	WAKE FOREST, NC 27587
NEW GRISSOM WAY	
BRAGG VALLEY LANE	
NEW GRISSOM WAY	
ROGERS FARM RD	

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BD00858/PR13577/U2015-1213 30-Oct-1! 30-Oct-1! Contractor NEW HOUSE BD00814 PR13535(U2015-0355 13-Apr-1'13-Apr-1'Contractor NEW HOUSE BD00857 PR13532 U2015-1192 28-Oct-1 28-Oct-1 Contractor NEW HOUSE BD00823 PR13553/ U2015-0516 26-May-126-May-1Contractor NEW HOUSE BD00920 PR13616! U2016-0872 14-Jul-16 14-Jul-16 Contractor NEW HOUSE BD00646 PR13372 U2012-0429 01-Jun-1201-Jun-12 Contractor NEW HOUSE BD00975(PR13647) U2017-0116 01-Feb-1 01-Feb-1 Contractor NEW HOUSE BD00690 PR13418: U2013-0277 26-Mar-1 26-Mar-1 Contractor NEW HOUSE BD00692 PR13418; U2013-0315 11-Apr-1: 11-Apr-1: Contractor NEW HOUSE BD00692; PR13423; U2013-0318 11-Apr-1; 11-Apr-1; Contractor NEW HOUSE BD00697 PR13418: U2013-0418 13-May-113-May-1 Contractor NEW HOUSE BD00702 PR13434: U2013-0501 06-Jun-1: 06-Jun-1: Contractor NEW HOUSE BD00704 PR13418(U2013-0552 18-Jun-1:18-Jun-1:Contractor NEW HOUSE BD00715 PR13438 U2013-0748 30-Jul-13 30-Jul-13 Contractor NEW HOUSE BD00826 PR13557(U201S-0577 09-Jun-1509-Jun-15Contractor NEW HOUSE BD00779 PR13335 U2014-0867 27-Aug-1-27-Aug-1-Owner NEW HOUSE BD00484 PR13169/ U2009-0779 23-Sep-0! 23-Sep-0! Contractor NEW HOUSE BD00486 PR13201(112009-0814 06-Oct-0) 06-Oct-0) Contractor NEW HOUSE BD00889 PR13602 U2016-0345 17-Mar-117-Mar-1 Contractor NEW HOUSE BD00949/PR13627(U2016-1328 17-Oct-1(17-Oct-1(Contractor NEW HOUSE BD00905 PR13610:U2016-0606 10-May-110-May-1Contractor NEW HOUSE BD00823 PR13555 U2015-0519 26-May-126-May-1 Contractor NEW HOUSE BD00842 PR10360(U2015-0910 21-Aug-1/21-Aug-1/Contractor NEW HOUSE BD00842 PR135648 U2015-0911 21-Aug-1 21-Aug-1 Contractor NEW HOUSE BD00822 PR13548: U201S-0508 21-May-121-May-1Contractor NEW HOUSE BD00776 PR13414(U2014-0815 13-Aug-1-13-Aug-1 Contractor NEW HOUSE BD00682 PR13412 U2013-0117 05-Feb-1: 05-Feb-1: Contractor NEW HOUSE BD00667: PR13388(U2012-0834 10-Oct-1; 10-Oct-1; Contractor NEW HOUSE BD00826 PR13555(U2015-0567 05-Jun-1: 05-Jun-1: Contractor NEW HOUSE BD00689 PR13395{U2013-0253 21-Mar-121-Mar-1 Contractor NEW HOUSE BD00793(PR13512)U2014-1186 19-Nov-1 19-Nov-1 Contractor NEW HOUSE BD00874 PR13583 U2016-0085 25-Jan-16 25-Jan-16 Contractor NEW HOUSE BD00838 PR13559(U2015-0825 31-Jul-15 31-Jul-15 Contractor NEW HOUSE BD00770 PR13502(U2014-0667 08-Jul-14 08-Jul-14 Contractor NEW HOUSE BD00789-PR13525/U2014-1089 23-Oct-1/23-Oct-1/Contractor NEW HOUSE BD00633: PR133SS: U2012-0158 06-Mar-106-Mar-1 Contractor NEW HOUSE BD00838 PR13559 U2015-0826 31-Jul-15 31-Jul-15 Contractor NEW HOUSE BD00810 PR13547(U2015-0281 25-Mar-125-Mar-1 Contractor NEW HOUSE BD00827/PR13555:U2015-0583 10-Jun-1510-Jun-15 Contractor NEW HOUSE BD00823 PR13555 U2015-0527 29-May-129-May-1 Contractor NEW HOUSE BD00495/PR13208{U2009-0934 23-Nov-0 23-Nov-0 Contractor NEW HOUSE BD00527 PR132408U2010-0357 28-Apr-1(28-Apr-1(Contractor NEW HOUSE BD00680/PR13268/U2013-0084 28-Jan-1328-Jan-13Contractor NEW HOUSE BD00587: PR13305/ U2011-0272 25-Apr-1: 25-Apr-1: Contractor NEW HOUSE BD00645 PR13028 U2012-0410 24-May-124-May-1Contractor NEW HOUSE BD01067-PR13028/U2018-0043 12-Jan-1E12-Jan-1EContractor NEW HOUSE BD00911/PR13606(U2016-0717 08-Jun-1608Jun-16Contractor NEW HOUSE BD00944 PR12481 U2016-1212 27-Sep-1(27-Sep-1(Contractor NEW HOUSE BD00787/PR11937(U2014-1051 15-Oct-1/15-Oct-1/Owner MOBILE HOME BD00862' PR12761' U2015-1277 18-Nov-1 18-Nov-1 Other MOBILE HOME BD01011/PR12761(U2017-0637 02-Jun-1702-Jun-170ther MOBILE HOME BD01020 PR13665(U2017-0774 06-Jul-17 06-Jul-17 Contractor NEW HOUSE BD00979 PR13645 U2017-0173 09-Feb-1 09-Feb-1 Contractor NEW HOUSE BD01019 PR13665: U2017-0770 06-Jul-17 06-Jul-17 Contractor NEW HOUSE BD00830 PR13549/U2015-0647 24-Jun-15 Contractor NEW HOUSE BD00990 PR13643 U2017-0346 23-Mar-1 23-Mar-1 Contractor NEW HOUSE BD00990'PR13643: U2017-03S1 24-Mar-124-Mar-1 Contractor NEW HOUSE BD00987/PR13643{U2017-0305 09-Mar-1 09-Mar-1 Contractor NEW HOUSE BD00853 PR13573(U2015-1126 09-Oct-1109-Oct-11Contractor NEW HOUSE

22-Jul-16 17-Sep-1! CT00003! 182500320846 12-Nov-1 10-Apr-1! CT00067, 182500321261 13-Dec-1(26-Oct-1) (T00140(182500322298 15-Oct-1: 26-May-1 CT00053: 182500324082 04-Apr-1, 24-Jun-16 CT000038 182500435567 26-Nov-101-Jun-12CT00003(183400035154 14-Jun-1725-Jan-17CT00040, 1914700030884 29-Aug-1 26-Mar-1 CT00053; 182500216282 19-Nov-1 08-Apr-1: CT00053: 182500216282 29-Jul-14 03-Apr-1: CT00067; 182500216282 27-Sep-1: 08-May-1 CT00053: 182500216282 03-Dec-1 28-May-1 CT00003 182500216282 30-Apr-1/13-Jun-12CT000532182500216282 25-Feb-1/19-Jul-13 CT00053: 182500216282 16-Oct-1105-Jun-15 CT000775 182500616551 24-Feb-1! 26-Aug-1 CT00077; 097800911591 06-Jan-1023-Sep-05 182600960359 13-Apr-1(05-Oct-0(CT00003(182600960359 11-Aug-1:02-Mar-1 CT00052(1836003635750 21-Mar-106-Oct-1(CT00114(182500437286 28-Oct-1f05-Apr-1fCT00114f182500438730 25-Sep-1:06-May-1CT00114(182500439147 11-Mar-106-Jul-15 (T00163) 182500459618 11-Mar-107-Jul-15 CT00163182500459618 04-Nov-1 20-Apr-1*CT00143: 182500516718 19-Feb-1!08-Aug-1-CT00053: 182500518216 25-Jun-1228-Jan-13CT00098(182500518801 01-Apr-1:08-Oct-1:CT00031:182500523693 11-Apr-1(22-May-1CT00021(182500523996 31-Oct-1: 21-Mar-1 CT00031; 182500524320 28-Mar-1 21-Oct-14 CT00053: 1825005 25341 28-Jul-16 19-Jan-16 CT000038 182500525821 01-Dec-1:31-Jul-15 CT00053: 182500526363 28-May-108-Jul-14 CT00143: 182500527376 04-May-109-Oct-1/CT00021(182500527858 06-Aug-1:23-Feb-1: CT00031: 182500528399 19-Jan-1631-Jul-15 CT00053:182500528753 21-Oct-1: 24-Mar-1 CT00021(182500530643 24-Nov-1 09-Jun-15 CT00021(182500531533 10-Nov-1 28-May-1 CT000038 182500536026 25-May-1 19-Nov-0 CT00037(182500600274 11-Feb-1 22-Apr-1(CT00048 182500612225 28-Jun-1225-Jan-12CT00118808780040745 20-Sep-1; 25-Apr-1: CT00031; 182500620421 18-Dec-1.24-May-1CT00003;182500622106 02-May-110-Jan-18 CT00053: 182500622106 30-Dec-1(11-Mar-1 CT00172:182500698414 22-Jun-1722-Sep-1(CT00026{182500720089 22-Jan-15 00:00:00 CT00063, 182500733005 10-Dec-15 00:00:00 182500734158 12-Jul-1700:00:00 182500734158 12-Feb-1(15-Jun-17CT00196(182500756798 2S-Jul-17 20-Jan-17CT00101 182500758757 29-Dec-1 16-Jun-17 CT00196f 182500767194 08-Dec-1'08-Apr-1' CT00101' 182500768821 20-Oct-1706-Feb-11CT001011182500769151 25-Oct-1, 13-Mar-1 CT00101! 182500769325 25-Oct-1,06-Feb-1; CT00101; 182500769426 22-Aug-1: 24-Aug-1: CT00101: 182500769546

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	CLAUDE CT
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	SILKY WILLOW DR
	MORNING SONG COURT
	MULBERRY LANE
	NEW GRISSOM WAY
	NEWGRISSOMWAY
	NEW GRISSOM WAY
	OAK HILL FARM LANE
	OLD FRANKLINTON RD
	OLD FRANKLINTON RD
	OLD FRANKLINTON RD
	SILKY WILLOW DR
	SILKY WILLOW DR
	SILKY WILLOW DR
	MORGAN HILL DRIVE
	MORGAN HILL DRIVE
	ARMIDA DR
	ANTERRA DRIVE
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	ARMIDA DRIVE ARMIDA DRIVE
	WHISPERING PINES LANE
	JASMINE CT
	THOROUGHBRED LN
	RIVER CLUB WAY
	IRONWOOD DR
	IRONWOOD DR

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WAKE FOREST NC 27587

OXFORD NC 27565

WAKE FOREST, NC 27587

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FRANKLINTON NC 27525

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STEM NC 27581

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BD00853 PR13573' U2015-1125 09-Oct-1: Contractor NEW HOUSE BD00805: PR13545; U2015-0174 23-Feb-1! 23-Feb-1! Contractor NEW HOUSE BD00821 PR13549: U2015-0500 20-May-120-May-1 Contractor NEW HOUSE BD00795 PR13531(U2014-1227 02-Dec-1/02-Dec-1/Contractor NEW HOUSE BD00779 PR13514(U2014-0876 02-Sep-1/02-Sep-1/Contractor NEW HOUSE BD00717!PR134522U2013-0806 16-Aug-1 16-Aug-1 Owner NEW HOUSE BD00505 PR13221: U2010-0065 21-Jan-1021-Jan-100wner MOBILE HOME BD00628; PR13347; U2012-0080 01-Feb-1; 01-Feb-1; Owner MOBILE HOME BD00697-PR13431:U2013-0419 13-May-113-May-1 Owner MOBILE HOME BD01019 PR13664 U2017-0771 06-Jul-17 06-Jul-17 Contractor NEW HOUSE BD01019 PR13664 U2017-0772 06-Jul-17 06-Jul-17 Contractor NEW HOUSE BD01020/PR13664(U2017-0773 06-Jul-17 06-Jul-17 Contractor NEW HOUSE BD01007(PR136611U2017-0577 18-May-118-May-1 Contractor NEW HOUSE BD01008 PR13661/U2017-0596 23-May-123-May-1Contractor NEW HOUSE BD01008 PR13661 U2017-0597 23-May-123-May-1Contractor NEW HOUSE BD01007 PR13653(U2017-0566 16-May-116-May-1Contractor NEW HOUSE BD01001 PR13643{U2017-0481 28-Apr-1:01-May-1Contractor NEW HOUSE BD00821: PR13549: U2015-0501 20-May-120-May-1Contractor NEW HOUSE 8D00641 PR13204; U2012-0319 19-Apr-1; 19-Apr-1; Contractor MODULAR HOME BD00626(PR13339)U2012-0024 12-Jan-1212-Jan-12 Contractor NEW HOUSE BD00387; PR13104(U2008-0663 28-Jul-08 28-Jul-08 Contractor NEW HOUSE BD00555: PR13273(U2010-0841 24-Sep-1(24-Sep-1(Owner NEW HOUSE BD00886 PR13604 U2016-0300 14-Mar-1 14-Mar-1 Contractor NEW HOUSE BD01001: PR13653: U2017-0483 28-Apr-1; 01-May-1Contractor NEW HOUSE BD01011/PR136611U2017-0628 01-Jun-1701-Jun-17Contractor NEW HOUSE BD00846(PR13573)U2015-0982 08-Sen-1108-Sen-11 Contractor NEW HOUSE BD00937 PR13627 U2016-1100 30-Aug-1 30-Aug-1 Contractor NEW HOUSE BD01001:PR13657{U2017-0482 28-Apr-1;01-May-1Contractor NEW HOUSE BD00846 PR13573(U2015-0983 08-Sen-1'08-Sen-1'Contractor NEW HOUSE BD01014: PR13661/ U2017-0695 19-Jun-1719-Jun-17 Contractor NEW HOUSE BD00931: PR13617: U2016-1024 15-Aug-1: 15-Aug-1: Contractor NEW HOUSE BD00899' PR13607' U2016-0528 26-Apr-1(26-Apr-1(Contractor NEW HOUSE BD00892 PR13574(U2016-0409 31-Mar-1 31-Mar-1 Contractor NEW HOUSE BD00892: PR13573: U2016-0408 31-Mar-1 31-Mar-1 Contractor NEW HOUSE BD00586: PR13303: U2011-0257 19-Apr-1: 19-Apr-1: Contractor NEW HOUSE BD00821: PR13549(U2015-0499 20-May-120-May-1 Contractor NEW HOUSE BD00732 PR13463{U2013-1107 08-Nov-1 08-Nov-1 Contractor NEW HOUSE BD00752 PR13488; U2014-0343 10-Apr-1/10-Apr-1/Contractor NEW HOUSE BD00950/PR13617(U2016-1334 17-Oct-1f17-Oct-1fContractor NEW HOUSE BD00821/PR13549/U2015-0502 20-May-120-May-1Contractor NEW HOUSE BD00840: PR13549! U2015-0884 18-Aug-1 18-Aug-1 Contractor NEW HOUSE BD00822/PR13549(U2015-0503 20-May-120-May-1Contractor NEW HOUSE BD00752 PR13478 U2014-0330 08-Apr-1/08-Apr-1/ Contractor NEW HOUSE BD00623;PR13343;U2011-0957 20-Dec-1 20-Dec-1 Contractor NEW HOUSE BD00583 PR13303 U2011-0222 05-Apr-1: 05-Apr-1: Contractor NEW HOUSE BD00624: PR13050: U2012-0005 05-Jan-1205-Jan-12 Contractor NEW HOUSE BD00612' PR13334/ U2011-0746 06-Oct-1106-Oct-11 Contractor NEW HOUSE BD00712/PR13446{U2013-0692 19-Jul-13 19-Jul-13 Contractor NEW HOUSE BD00662:PR13388(U2012-0744 11-Sep-1:11-Sep-1:Contractor NEW HOUSE BD00741: PR13472: U2014-0099 04-Feb-1: 04-Feb-1: Contractor NEW HOUSE BD00683 PR134104U2013-0135 12-Feb-1; 12-Feb-1; Contractor NEW HOUSE BD00613: PR133342U2011-0765 13-Oct-1113-Oct-11 Contractor NEW HOUSE BD00751; PR13494! U2014-0320 07-Apr-1/07-Apr-1/Contractor NEW HOUSE BD00601 PR130885 U2011-0508 11-Jul-11 11-Jul-11 Owner MOBILE HOME BD00623 PR13344 U2011-0952 16-Dec-1 16-Dec-1 Owner MOBILE HOME BD00839 PR13564(U2015-0863 11-Aug-1:11-Aug-1: Contractor NEW HOUSE BD00497-PR13212! U2009-0961 07-Dec-0! 07-Dec-0! Contractor NEW HOUSE BD00880 PR13593 U2016-0208 19-Feb-1(19-Feb-1(Contractor NEW HOUSE BD00674/PR13400:U2012-0976 30-Nov-1 30-Nov-1 Contractor NEW HOUSE

01-Apr-1(21-Aug-1'CT00101'182500769697 24-Jun-1523-Feb-11CT000537182500777978 19-May-106-Apr-1! CT00101! 182500778007 29-Apr-1:10-Nov-1 CT00003:182500778718 11-Feb-1! 29-Aug-1-CT00053: 182500789018 07-Nov-1 06-Aug-1 CT00076(182500807382 03-May-10 00:00:0 182500814352 10-Apr-12 00:00:00 CT00013; 182500819963 25-Jun-1300:00:00 CT00063; 182500824040 05-Jun-1816-Jun-17CT00196F182500850728 14-Mar-115-Jun-17CT00196(182500851865 21-Dec-1 17-Jul-17 CT00196(182500852983 01-Nov-1 17-May-1CT00101 182500853701 30-Nov-1 16-May-1CT00101'182500856892 13-Feb-1116-May-1 CT001011182500856943 13-Nov-1 10-Mar-1 CT00101 182500857700 13-Oct-1,24-Apr-1,CT00101,182500860179 26-Jul-16 07-Apr-1! CT00101! 182500860853 25-Sep-1; 19-Apr-1; CT00020; 099500924918 19-Jul-12 09-Jan-12 CT00003 1825002100112 03-May-102-Jul-08 CT00036 182500216282 17-Mar-1 23-Sep-1(CT00001:08880147376 28-Jul-16 14-Mar-1 CT00001:088801379106 13-Nov-1 10-Mar-1 CT00101 182500862496 14-Mar-1 16-May-1 CT00101 182500863217 11-May-124-Aug-1:CT001011182500863606 25-Apr-1: 25-Aug-1: CT00101: 182500863920 19-Dec-1 24-Apr-1 CT00101 182500864135 14-Apr-1(25-Aug-1)CT00101(182500864562 12-Apr-1{16-May1CT00101{182500865044 12-Apr-1: 11-Aug-1: CT00101! 182500865366 14-Nov-1 18-Mar-1 CT00101*182500866260 14-Nov-1 25-Aug-1:CT00101:182500867613 03-May-125-Aug-1:CT00101:182500868486 02-Sep-1 18-Apr-1 CT00067 182500868758 15-Oct-1:07-Apr-1:CT00101:182500870045 15-Jul-14 29-Oct-1: CT00053: 182500870707 29-Jul-14 09-Apr-1(CT00053: 182500871741 12-Jul-17 19-Sep-1(CT00101!182500872578 11-May-106-Apr-1(CT00101(182500873038 03-Jun-1607-Apr-11CT001011182500874215 19-May-107-Apr-1: CT00101: 182500874359 03-Sep-1/28-Mar-1 CT00021(182500874775 12-Jun-1220-Dec-1 CT00067/182500876947 02-Sep-1:04-Apr-1:CT00053:182500877000 04-May-130-Dec-1 CT00031/182500877330 11-Jul-12 05-Oct-11CT00067; 182500877443 25-Mar-1 12-Jul-13 CT00031 182500877651 14-Aug-1 11-Sep-1; CT00067; 182500877955 10-Nov-1 27-Jan-14CT00021(182500880095 25-Mar-107-Feb-1: CT00031; 182500884062 30-Oct-1;13-Oct-11CT00067;182500888063 26-Aug-1-07-Apr1/CT00001;08881460652 19-Jul-1100:00:00 182500903348 14-Feb-1200:00:0CCT00027:182500903348 10-Dec-1:10-Aug-1:CT00048(182500960442 13-May-103-Dec-0' CT00054: 0876048/14968 26-Sep-1(30-Dec-1'CT00046(182400542610 07-Jun-1: 30-Nov-1 CT00053: 182500962761

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BD00562(PR13280) U2010-0958 02-Nov-1 02-Nov-1 Contractor NEW HOUSE BD00856 PR13576(1)2015-1179 23-Oct-1(23-Oct-1)Contractor NEW HOUSE BD00644 PR13054 U2012-0384 15-May-1 15-May-1 Contractor NEW HOUSE BD00695/PR13423(U2013-0364 25-Apr-1: 25-Apr-1: Contractor NEW HOUSE BD00654/PR13380! U2012-0568 17-Jul-12 17-Jul-12 Contractor NEW HOUSE BD00900 PR13605(U2016-0537 27-Apr-1(27-Apr-1(Contractor NEW HOUSE BD00856 PR13571{U2015-1178 23-Oct-1{23-Oct-1{Contractor NEW HOUSE BD00606 PR13327 U2011-0615 16-Aug-1 16-Aug-1 Contractor NEW HOUSE BD00528 PR13237 U2010-0374 04-May-104-May-1Contractor NEW HOUSE BD00684.PR13415:U2013-0149 15-Feb-1:15-Feb-1:Contractor NEW HOUSE BD00684 PR13409(U2013-0150 15-Feb-1:15-Feb-1:Contractor NEW HOUSE BD00597 PR13315; U2011-0441 16-Jun-1116-Jun-11Contractor NEW HOUSE BD00542, PR13256! U2010-0582 07-Jul-10 07-Jul-10 Contractor NEW HOUSE BD00516;PR13231(U2010-0218 12-Mar-112-Mar-1 Contractor NEW HOUSE BD00528 PR13239 U2010-0376 04-May-104-May-1Contractor NEW HOUSE BD00546/PR13254:U2010-0674 05-Aug-1/05-Aug-1/Contractor NEW HOUSE BD00570 PR13288.U2011-0014 07-Jan-1107-Jan-11Contractor NEW HOUSE BD00525 PR13239 U2010-0334 20-Apr-1(20-Apr-1(Contractor NEW HOUSE BD00633(PR13356)U2012-0159 06-Mar-106-Mar-1 Contractor NEW HOUSE BD00809(PR13540/112015-0251 19-Mar-119-Mar-1 Contractor NEW HOUSE BD00669 PR13396(U2012-0888 01-Nov-1 01-Nov-1 Contractor NEW HOUSE BD00551 PR13263 U2010-0778 02-Sep-1(02-Sep-1(Contractor NEW HOUSE BD00684: PR13405! U2013-0171 21-Eeb-1: 21-Eeb-1: Contractor NEW HOUSE BD00715 PR13448(U2013-0747 30-Jul-13 30-Jul-13 Contractor NEW HOUSE BD01009 PR13645: U2017-0613 30-May-130-May-1 Contractor MODULAR HOME BD00678 PR13410 U2013-0036 10-Jan-1310-Jan-13Contractor NEW HOUSE BD00685(PR13409)U2013-0179 22-Feb-1: 22-Feb-1: Contractor NEW HOUSE BD00961(PR13631(U2016-1533 02-Dec-1(02-Dec-1)Contractor NEW HOUSE BD00968:PR136254U2017-0017 05-Jan-1705-Jan-17Owner NEW HOUSE BD01063 PR13657(U2017-1433 20-Dec-1 20-Dec-1 Contractor NEW HOUSE BD00891 PR13375(U2016-0376 24-Mar-1 24-Mar-1 Contractor MOBILE HOME BD00918 PR13612 U2016-0819 30-Jun-1f 30-Jun-1f Contractor NEW HOUSE BD00708 PR13415 U2013-0616 27-Jun-1227-Jun-12 Contractor NEW HOUSE BD00700 PR12941(U2013-0473 31-May-131-May-1 Contractor NEW HOUSE BD00821/PR13546(U2015-0491 19-May-119-May-1Contractor NEW HOUSE BD00871 PR12949(U2016-0029 08-Jan-1E08-Jan-1EContractor NEW HOUSE BD00872 PR12949 U2016-0047 12-Jan-1E12-Jan-1E Contractor NEW HOUSE BD00804: PR13540: U2015-0153 16-Feb-1! 16-Feb-1! Contractor NEW HOUSE BD00780/PR13517(U2014-0886 05-Sep-1/OS-Sep-1/Contractor NEW HOUSE BD00958 PR13631 U2016-1487 17-Nov-1 17-Nov-1 Contractor NEW HOUSE BD00741'PR13480'U2014-0100 04-Feb-1/04-Feb-1/Contractor NEW HOUSE BD00837 PR13557 U2015-0816 29-Jul-15 29-Jul-15 Contractor NEW HOUSE BD00784' PR13523' U2014-0994 02-Oct-1/ 02-Oct-1/ Other MOBILE HOME BD00670 PR13395/ U2012-0891 01-Nov-1 01-Nov-1 Other MOBILE HOME BD00888/PR13538/U2016-0338 17-Mar-117-Mar-1 Contractor NEW HOUSE BD00920 PR13596 U2016-0873 14-Jul-16 14-Jul-16 Contractor NEW HOUSE BD00518 PR13234(1)2010-0248 23-Mar-1 23-Mar-1 Contractor NEW HOUSE BD00853(PR12977)U2015-1129 12-Oct-112-Oct-11Contractor NEW HOUSE BD00746 PR12977{U2014-0216 05-Mar-105-Mar-1 Contractor NEW HOUSE BD00914 PR13538 U2016-0772 20-Jun-1620-Jun-16 Contractor NEW HOUSE BD00898 PR12953 U2016-0508 21-Apr-1(21-Apr-1(Contractor NEW HOUSE BD00747 PR13014 U2014-0244 17-Mar-117-Mar-1 Contractor NEW HOUSE BD00873 PR13595 U2016-0055 13-Jan-1613-Jan-16 Contractor NEW HOUSE BD00853 PR12977(U2015-1128 12-Oct-1!12-Oct-1!Contractor NEW HOUSE BD00871, PR12977! U2016-0030 08-Jan-1E08-Jan-1EContractor NEW HOUSE BD00858' PR13580/ U2015-1225 02-Nov-1 02-Nov-1 Contractor NEW HOUSE BD00808 PR13541:U2015-0229 13-Mar-113-Mar-1 Contractor NEW HOUSE BD00742 PR13458; U2013-0956 05-Feb-1/02-Oct-1: Contractor NEW HOUSE BD00559 PR13265 U2010-0899 12-Oct-1(12-Oct-1(Contractor NEW HOUSE

26-Apr-1:01-Nov-1 CT00053: 182500963403 29-Aug-1: 20-Oct-1: CT00048(182500965544 13-Nov-1 11-May-1 CT00031; 182500966712 15-May-105-Apr-11CT00048(182500970075 13-Feb-1: 12-Jul-12 CT00031; 182500970492 07-Sep-1(21-Apr-1(CT00174,182500971506 17-Jun-1E 21-Oct-15 CT00048(182500971759 30-Mar-112-Aug-1 CT00053: 182500973051 21-Apr-1: 29-Apr-1(CT00031; 182500974106 08-Oct-1:14-Feb-1:CT00120(182500974216 23-Jan-1514-Feb-1: CT00120(182500974325 09-Dec-1 15-Jun-11CT000S1 182500974534 21-Apr-1:07-Jul-10 CT000S1:182500974646 01-Sep-1(11-Mar-1 CT00048(182500974778 04-Oct-1129-Apr-1(CT00067; 182500975971 21-Oct-1:04-Aug-1: CT000674 182500978018 30-Mar-105-Jan-11CT00048(182500978244 29-Oct-1(20-Apr-1(CT00053:182500978628 10-Oct-1202-Mar-1 CT00053: 182500980024 21-Aug-1 19-Mar-1 CT00048(182500982212 24-Apr-1:25-Oct-1;CT00048(182500983293 23-Nov-1 02-Sep-1(CT00048(182500986474 21-Nov1 21-Feb-1: CT00067: 182500988559 23-Oct-1:19-Jul-13 CT00053:182500989368 31-Jul-17 30-May-17 00:00:0 182600185461 23-Apr-1: 10-Jan-13 CT000718 182600208233 26-Aug-1.21-Feb-1; CT00001(182600466001 09-May-121-Nov-1 CT00168 182600466001 11-Apr-1/22-Nov-1 CT00077 182600537939 02-May-111-Dec-1 CT00053:182600565275 05-Aug-16 00:00:0(CT00081; 182600679432 06-Dec-1(29-Jun-1(CT00002,182600715199 29-Jul-14 28-Jun-12CT000027182600727372 13-Nov-1 24-May-1CT00002; 182600727675 24-Nov-1 18-May-1CT00101(182600735986 01-Jul-16 22-Dec-1:CT00002, 182600736279 26-Sep-1f12-Jan-1ECT00002;182600736551 16-Oct-1: 02-Feb-1! CT00021(182600736880 15-Apr-1111-Aug-1/CT00134(182600739757 20-Jun-1717-Nov-1 CT00134(182600744057 02-Jun-1523-Jan-14 CT001016182600744314 21-Jan-16 24-Jul-1S CT001016 182600747105 20-Jan-15 00:00:00 182600771326 13-Dec-12 00:00:00 CT00013; 182600779162 13-Dec-1:08-Mar-1 CT00002, 182600813880 13-Feb-1:24-Jun-16 CT00002; 182600814482 27-Jul-10 23-Mar-1 CT00002 182600814915 04-Mar-1 08-Oct-1: CT00002, 182600821897 09-Oct-1/03-Mar-1 CT00002, 182600822752 27-Jan-1715-Jun-1f CT00002;182600823181 13-Feb-1:08-Apr-1(CT00002;182600823236 17-Oct-1/12-Mar-1 CT000027182600823506 30-Nov-1 04-Dec-1/CT000027182600830388 11-Feb-1(08-Oct-1)CT00002, 182600831062 15-Nov1 04-Dec-1! CT00002; 182600831128 27-Apr-1(02-Oct-1: CT00079: 182600831894 17-Nov-1 12-Feb-1! CT00079; 182600832682 27-Mar14 00:00:0(CT00002(182600833441 18-Jul-11 11-Oct-1(CT00021f 182600833857

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BD00726/PR13370(U2013-0971 08-Oct-1:08-Oct-1:Contractor NEW HOUSE BD00739 PR13476!U2014-0027 09-Jan-1409-Jan-14Contractor NEW HOUSE BD00734 PR13469/U2013-1151 20-Nov-1 20-Nov-1 Contractor NEW HOUSE BD00883;PR13587!U2016-0263 02-Mar-102-Mar-1Contractor NEW HOUSE BD00995(PR13624112017-0400 05-Apr-1105-Apr-11Contractor NEW HOUSE BD00937'PR13587(U2016-1099 29-Aug-1)29-Aug-1)Contractor NEW HOUSE BD00735/PR13469(U2013-1165 25-Nov-1 25-Nov-1 Contractor NEW HOUSE BD00852 PR13559 U2015-1108 07-Oct-1 O7-Oct-1 Contractor NEW HOUSE BD00554.PR13270(U2010-0827 23-Sep-1(23-Sep-1(Contractor NEW HOUSE BD00794/PR13496/U2014-1194 20-Nov-1 20-Nov-1 Contractor NEW HOUSE BD00836/PR12991/U2015-0794 28-Jul-15 28-Jul-15 Contractor NEW HOUSE BD00436 PR13155(U2009-0156 11-Mar-011-Mar-0 Contractor NEW HOUSE BD00810 PR13540(U2015-0273 24-Mar-124-Mar-1 Contractor NEW HOUSE BD00570 PR13284 U2011-0015 07-Jan-1107-Jan-11Contractor NEW HOUSE BD00769 PR13503 U2014-0664 08-Jul-14 08-Jul-14 Contractor NEW HOUSE BD00601(PR13319(U2011-0506 06-Jul-11 06-Jul-11 Contractor NEW HOUSE BD00513:PR13226(U2010-0176 02-Mar-1 02-Mar-1 Contractor NEW HOUSE BD00644:PR13330(U2012-0379 10-May-110-May-1Owner NEW HOUSE BD00633/PR13335(U2012-0157 06-Mar-1 06-Mar-1 Contractor NEW HOUSE BD00636(PR13358112012-0202 20-Mar-1 20-Mar-1 Contractor NEW HOUSE BD00883'PR13559(U2016-0262 02-Mar-1 02-Mar-1 Contractor NEW HOUSE BD00683(PR13415(U2013-0145 14-Feb-1)14-Feb-1)Contractor NEW HOUSE BD00647 PR13365 U2012-0435 04-lup-1204-lup-12 Contractor MODULAR HOME BD00513 PR13228 U2010-0177 02-Mar-1 02-Mar-1 Contractor NEW HOUSE BD00505' PR13212; U2010-0071 25-Jan-10 25-Jan-10 Contractor NEW HOUSE BD00958'PR13624(U2016-1488 17-Nov-1 17-Nov-1 Contractor NEW HOUSE BD00739(PR13476(1)2014-0026 09-Jan-1409-Jan-14Contractor NEW HOUSE BD00534 PR13248(112010-0485 08-lun-1008-lun-10 Contractor NEW HOUSE BD00527 PR13240 U2010-0356 28-Apr-1(28-Apr-1(Contractor NEW HOUSE BD00903 PR13503 U2016-0593 05-May-1 OS-May-1 Contractor NEW HOUSE BD00853 PR13576(1)2015-1120 09-Oct-1109-Oct-11 Contractor NEW HOUSE BD00500'PR13214'U2009-1011 23-Dec-0!23-Dec-0!Contractor NEW HOUSE BD00814 PR13539(1)2015-0351 13-Apr-1(13-Apr-1) Contractor NEW HOUSE BD00529 PR13233 U2010-0387 07-May-1 07-May-1 Contractor NEW HOUSE BD00749 PR13486 U2014-0279 26-Mar-1 26-Mar-1 Contractor NEW HOUSE BD00546: PR13261: U2010-0677 05-Aug-1(05-Aug-1) Contractor NEW HOUSE BD00587(PR13307:U2011-0267 21-Apr-1:21-Apr-1:Contractor NEW HOUSE BD00741 PR13459(U2014-0098 04-Feb-1/04-Feb-1/Contractor NEW HOUSE BD00793 PR135221U2014-1183 19-Nov-1 19-Nov-1 Contractor NEW HOUSE BD00773 PR13509 12014-0747 28-Jul-14 28-Jul-14 Contractor NEW HOUSE BD01037(PR13678; U2017-1023 12-Sep-1; 12-Sep-1; Contractor NEW HOUSE BD01037 PR13678 U2017-1024 12-Sep-1 12-Sep-1 Contractor NEW HOUSE BD00653 PR13369{U2012-0543 11-Jul-12 11-Jul-12 Owner MOBILE HOME BD00898 PR11901, U2016-0518 22-Apr-1(22-Apr-1(Occupant MOBILE HOME BD00766/PR13507(112014-0613 26-lun-1/26-lun-1/Contractor NEW HOUSE BD00692/PR13422;U2013-0314 11-Apr-1; 11-Apr-1; Other MOBILE HOME BD00883/PR13596(U2016-0253 01-Mar-101-Mar-1 Contractor NEW HOUSE BD00881; PR11766(U2016-0227 25-Feb-1(25-Feb-1(Owner MOBILE HOME BD00696 PR13426(U2013-0388 03-May-103-May-1Owner MOBILE HOME BD00772(PR13511: U2014-0727 22-Jul-14 22-Jul-14 Other MOBILE HOME BD00930; PR13620; U2016-1004 12-Aug-1:12-Aug-1: Contractor NEW HOUSE BD00930 PR13620: U2016-1003 12-Aug-1: 12-Aug-1: Contractor NEW HOUSE BD0 084 0 PR12833! U2 015-0885 18-Aug-1 18-Aug-1 Contractor NEW HOUSE BD00604 PR13319; U2011-0579 0 5-Aug-1 05-Aug-1 Contractor NEW HOUSE BD00670 PR13395 U2012-0892 01-Nov-1 01-Nov-1 Other MOBILE HOME BD00321:PR11583(U2007-1296 12-Dec-0'12-Dec-0'Owner NEW HOUSE BD01037; PR13678(U2017-1025 12-Sep-112-Sep-11 Contractor NEW HOUSE BD00844:PR13575(U2015-0953 01-Sep-1:01-Sep-1:Contractor NEW HOUSE BD01037 PR13678 U2017-1026 12-Sep-1 12-Sep-1 Contractor NEW HOUSE

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16-Oct-1, 25-Aug-17 00:00:0(182900379214 03-Jan-1805-Jul-17 CT00197(182900477689 11-Mar-1 14-Oct-1: CT00053: 182900533674 14-Mar-18 00:00:0(CT00013; 182900889108 06-Nov-13 00:00:0(CT00077, 182900928496 04-Dec-12 00:00:00 CT00063, 182900996908 28-Aug-1/27-Feb-1/CT00139' 183200098387 05-Jul-1300:00:00 CT00118(183200189318 17-Apr-13 00:00:00 CT00013 (183200291784 14-May-128-Oct-1; CT00046; 183300024395 03-Oct-1, 08-Aug-0 CT00003(183300025556 19-Jan-1219-Jul-11 CT00046 183300025777 24-Mar-108-Sep-1(CT00120, 183300028480 20-Dec-1 03-Oct-1(CT00101(183300099469 02-Dec-1:07-Jan-14CT00002(183300114234 14-Aug-1-17-Jun-12CT00003(183300122981 30-Jan-1419-Jul-13 CT00063(183300124762 01-Dec-1(07-Jul-09 CT00003; 183300132315 29-Sep-1(08-Apr-1(CT00020, 183300204288 22-Dec-1(01-Jul-10 CT00064(183300277812 20-Apr-1{15-Nov-1 CT00120 183300491942 17-Feb-1(24-Apr-1(CT00144)183400003817 13-Jul-17 16-Nov-1 CT00003, 183400011656 09-Mar-116-Jun-1(CT00144-183400013086 25-Oct-1(27-Jan-1(CT00048)183400017089 01-Jul-16 31-Aug-1 CT00003(183400024929 20-Dec-1 29-Jun-1 CT00003 (183400028969 27-Feb-1{07-Sep-1.CT00002.182500437121 10-Dec-1:05-Jun-15CT00003{183500220436 26-Aug-1:23-Dec-1(CT00101'182500860957 31-Aug-1:22-Dec-1/CT00101! 182500860957 29-Jun-1(28-May-CCT00003(183400061215 28-Sep-1: 10-Aug-0: CT00003(183400074435 18-Dec-1 12-May-1 CT000038 183400074548 23-May-129-Aug-1 CT000038 183400074844 09-Mar-112-May-1CT00003{183400080089 01-Sep-1(23-Dec-1/CT00169) 183400101921 14-Jan-1(30-Jun-09 183400103776 12-Nov-1 22-Dec-1/CT00101*182500860957 24-Oct-1200:00:00CT00063:183400196804 01-Aug-11 00:00:0(CT00013: 183400292076 19-Oct-1500:00:00 CT00013; 183400292076 183400292076 14-Jun-17 00:00:00 09-May-13 00:00:0 CT00013; 183400367751 14-Jun-1712-Apr-1: CT00081; 183400464749 26-Sep-13 00:00:0C CT00026(183400472224 15-Oct-1:21-Jun-1:CT00126(183400473560 29-Dec-1: 27-Sep-1: CT00053: 183500071773 29-May-102-Oct-1: CT00067; 183500073712 18-Jul-14 09-Oct-1 CT00048(183500080151 27-Apr-1(03-Sep-1)CT00048(183500082076 08-Sep-1.17-Nov-16 00:00:0(183500106451 03-Feb-17 00:00:0C CT00138: 183500107615 15-Dec-17 00:00:00 183500210146 26-Jun-1523-Dec-1-CT001015182500860957 12-Sep-1/17-Jun-12CT00125/183500261043 15-Apr-1(30-Jul-15 CT00003(183500282396 22-Sep-1(16-Apr-1(CT00003(183500283606 02-Feb-1:27-May-1CT00003(183500283875

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CANNADY MILL RD	KITTRELL NC 27544
EATON RD	KITTRELL NC 27544
WIGGINS ROAD	YOUNGSVILLE, NC 27596
JONAH DAVIS RD	YOUNGSVILLE NC 27596
GOLDEN MEADOWS RD	YOUNGSVILLE, NC 27596
BELMONT CIRCLE	WAKE FOREST, NC 27587
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BELMONT CIRCLE	
STONEWAY CT	
GRAHAM SHERRON RD	
EMERALD CREST CT	YOUNGSVILLE, NC 27596
STONEWAY COURT	WAKE FOREST, NC 27587
STONEWAY COURT	WAKE FOREST NC 27587
BELMONT CIRCLE	WAKE FOREST NC 27587
WOODCREST DR	YOUNGSVILLE NC 27596
LAKE HART TRL	WAKE FOREST NC 27587
GRAHAM SHERRON RD	WAKE FOREST NC 27587
BROWNING PLACE	
CASHMERE LN	YOUNGSVILLE, NC 27596
BROWNING PLACE	YOUNGSVILLE, NC 27596
CASHMERE LN	TOUNGSVILLE, NC 27590
WHISPERWOOD COURT	
MORNING SONG	YOUNGSVILLE NC 27596
PINE NEEDLES DR	WAKE FOREST NC 27587
PINE RIDGE RD	WARE FOREST NC 27587
RAPIDS COURT	FRANKLINTON NC 27525
RAPIDS COURT	FRANKLINTON NC 27525
SILVERLEAF DRIVE	YOUNGSVILLE NC 27596
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CASHMERE LN	YOUNGSVILLE NC 27596
RAPIDS COURT	FRANKLINTON NC 27525
POCOMOKE II DR	FRANKLINTON NC 27525
BRUCE GARNER RD	FRANKLINTON NC 27525
BRUCE GARNER RD	FRANKLINTON NC 27323
BRUCE GARNER ROAD	
MAYS STORE RD	FRANKLINTON NC 27525
MAYS STORE RD	FRANKLINTON NC 27525
TAYLORS FARM ROAD	FRANKLINTON, NC 27525
SHYANNE DRIVE	FRANKLINTON, NC 27525
IRONWOOD DRIVE	
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BD00589' PR133114 U2011-0308 06-May-106-May-1 Contractor NEW HOUSE BD00949 PR13634³U2016-1324 14-Oct-1614-Oct-1(Contractor NEW HOUSE BD00556 PR13270; U2010-0856 28-Sep-1(28-Sep-1(Owner NEW HOUSE BD00987-PR13645/U2017-0164 13-Mar-113-Mar-1 Contractor NEW HOUSE BD00968 PR13643! U2017-0009 03-Jan-1703-Jan-17 Contractor NEW HOUSE BD01028 PR13670(U2017-0899 07-Aug-1 07-Aug-1 Contractor NEW HOUSE BD00728/PR13445 U2013-1011 15-Oct-1 15-Oct-1 Contractor NEW HOUSE BD00723 PB13457{U2013-0923 24-Sep-1: 24-Sep-1: Contractor MOBILE HOME BD00960 PR13640(U2016-1505 23-Nov-1 23-Nov-1 Contractor MOBILE HOME BD00729 PR13453(U2013-1036 22-Oct-1: 22-Oct-1: Other MOBILE HOME BD00622/PR13344(U2011-0927 08-Dec-1 08-Dec-1 Other MOBILE HOME BD01022 PR11113 U2017-0799 11-Jul-17 1 1-Jul-17 Contractor MODULAR HOME BD00750 PR13490(U2014-0300 31-Mar-131-Mar-1 Other MOBILEHOME BD00602 PR13322{U2011-0523 15-Jul-11 15-Jul-11 Contractor NEW HOUSE BD00987 PR13656 U2017-0308 10-Mar-1 10-Mar-1 Contractor MOBILE HOME BD00542'PR13256(U2010-0596 13-Jul-10.1.3-Jul-10.0wner NEW HOUSE BD00466 PR13182; U2009-0534 17-Jul-09 17-Jul-09 Owner NEW HOUSE BD00709 PR13437{U2013-0625 28-Jun-1501-Jul-13 Owner MOBILE HOME BD00918 PB13618⁽¹⁾2016-0812 28-lun-1f 28-lun-1f Contractor MOBILE HOME BD00528: PR13243: U2010-0383 06-May-106-May-1Contractor MOBILE HOME BD00614 PR13336(U2011-0773 19-Oct-1)19-Oct-1)Contractor NEW HOUSE BD00963 PR12394 U2016-1557 07-Dec-1(07-Dec-1) Contractor MOBILE HOME BD00963 PB12394(U2016-1556 07-Dec-1) Contractor MOBILE HOME BD00990 PR13642(U2017-0338 21-Mar-1 21-Mar-1 Other MOBILE HOME BD00984 PR12232 U2017-0264 01-Mar-1 01-Mar-1 Contractor MOBILE HOME BD00577 PR13291(U2011-0119 25-Feb-1:25-Feb-1:Owner MOBILE HOME BD00694 PR13408 U2013-0357 24-Apr-1 24-Apr-1 Owner MOBILE HOME BD00878(PR13592)U2016-0146 08-Feb-1(08-Feb-1(Owner NEW HOUSE BD00594 PR13308(U2011-0375 27-May-127-May-1 Contractor MODULAR HOME BD00680/PR13402/U2013-0061 22-Jan-1322-Jan-13 Other MOBILE HOME BD00557'PB13264(U2010-0881 06-Oct-1(06-Oct-1(Contractor MOBILE HOME BD00807 PR13545 U2015-0215 10-Mar-1 10-Mar-1 Contractor MOBILE HOME BD00732'PR13470{U2013-1122 13-Nov-1 13-Nov-1 Other MOBILE HOME BD01009 PR10548 U2017-0609 26-May-126-May-1 Owner MOBILE HOME BD00712 PR13446: U2013-0690 18-Jul-13 18-Jul-13 Contractor MODULAR HOME BD01070 PR11463 U2018-0112 05-Feb-1 05-Feb-1 Other MOBILE HOME BD00916: PR13617: U2016-0799 24-Jun-1€ 24-Jun-1€ Contractor NEW HOUSE BD00703 PR10539(U2013-0538 17-lun-1-17-lun-1-Owner MOBILE HOME BD00557/PR13271(U2010-0880 06-Oct-1(06-Oct-1(Owner MODULAR HOME BD00960 PR13642: U2016-1506 23-Nov-1 23-Nov-1 Contractor MOBILE HOME BD00573 PR13291(U2011-0061 01-Feb-1/01-Feb-1/Contractor MODULAR HOME BD00614/PR13333(U2011-0778 20-Oct-1)20-Oct-1)Occupant MOBILE HOME BD00700; PR13433(U2013-0477 03-Jun-1203-Jun-12Contractor MOBILE HOME BD00803 PR13543 U2015-0136 09-Feb-1 09-Feb-1 Owner MOBILE HOME BD00656 PR13382 U2012-0603 27-Jul-12 27-Jul-12 Owner MOBILE HOME BD00967 PR10081 U2016-1626 30-Dec-1 30-Dec-1 Owner MOBILE HOME BD00259 PR13011(U2007-0596 0S-lun-0; 05-lun-0; Owner NEW HOUSE BD00541 PR13254 U2010-0572 01-Jul-10 01-Jul-10 Contractor MODULAR HOME BD00436 PR13156 U2009-0158 11-Mar-011-Mar-0 Contractor MODULAR HOME BD00872 PR135955 U2016-0051 13-Jan-1613-Jan-16 Contractor NEW HOUSE BD00554 PR13272 U2010-0828 23-Sen-1(23-Sen-1(Contractor NEW HOUSE BD00787 PR13528(U2014-1054 17-Oct-1/17-Oct-1/Contractor NEW HOUSE BD00971 PR13647{U2017-0058 20-Jan-1720-Jan-17Contractor NEW HOUSE BD00956 PR13640/U2016-1443 09-Nov-1 09-Nov-1 Contractor NEW HOUSE BD00935(PR13631:U2016-1067 23-Aug-1:23-Aug-1:Contractor NEW HOUSE BD00782/PR13504(U2014-0923 16-Sep-1/16-Sep-1/Contractor NEW HOUSE BD00864' PR13575(U2015-1319 01-Dec-1!01-Dec-1!Contractor NEW HOUSE BD00992/PR13658(U2017-0374 30-Mar-130-Mar-1 Contractor NEW HOUSE BD00897-PR13612(U2016-0498 20-Apr-1(20-Apr-1(Contractor NEW HOUSE

23-Mar-105-May-1CT000028183400123579 18-May-112-Oct-1(CT00120) 190200974216 09-May-1 23-Sep-1(CT00071(190400835359 03-Nov-1 09-Mar-1 CT00001(190400933531 17-May-119-Dec-1(CT00120*190400936700 09-Feb-1(11-Jul-17 CT00124, 190400945790 29-Apr-1/15-Oct-1;CT00001(190400946957 16-Dec-13 00:00:00 CT00013: 190401451677 17-Jan-17 00:00:00 CT00081;190402564557 11-Dec-13 00:00:00 CT000138 190402566903 05-Jan-11 00:00:00 CT00013(190402769191 13-Dec-1 03-Jul-17 00:00:00 190402870494 19-Jun-14 00:00:00 190402873587 29-Feb-1;13-Jul-11 CT00000; 190500674797 19-Apr-17 00:00:00 CT00118(190504804451 13-Jul-12 15-Jul-11 12-Jul-10 190603440676 190604917194 20-May-115-Jul-09 05-Sep-13 00:00:0C CT00013; 190604942374 14-Sep-16 00:00:00 CT00081 190604946329 17-May-10.00:00:0 CT00013(190700158786 15-Feb-1(17-Oct-1)CT00022(190700178131 28-Feb-17 00:00:0C CT00118(190700313140 03-May-17 00:00:0 CT00118(190700315212 22-Aug-17 00:00:0(CT00065: 190700390921 06-Mar-18 00:00:0(CT00118(190700537020 28-Mar-11 00:00:0(CT00077; 190700582393 07-Oct-13 00:00:00 190700651961 03-Nov-1 12-Feb-1(CT00077, 190700666093 17-Nov-1 26-May-1 CT00020, 190700785843 26-Apr-13 00:00:00 CT00065: 190700936099 01-Nov-12 00:00:0(CT00071/ 190700963481 20-Apr-15 00:00:00 190800208705 23-Jan-14 00:00:00 CT00013/190800429983 28-Jui-17 00:00:00 190800510430 02-Oct-1:08-Jul-13 CT00129(190800586525 03-Apr-18 00:00:00 CT00013; 190800723854 20-Dec-1:06-Jun-1(CT00166(1836005822044 11-Jul-13 00:00:00 CT00013; 190800913995 15-Dec-1(05-Oct-1(190800997606 10-Jan-17 00:00:00 CT00063: 190900818265 26-Apr-1:01-Feb-1:CT00013:190900917630 13-Jan-12 00:00:00 CT00013; 191000471464 06-Aug-13 00:00:00 CT00013, 191000471464 27-May-15 00:00:0 CT00063; 191000471464 23-Oct-12 00:00:00 CT00109: 191000763972 03-Aug-17 00:00:00 CT00077, 191101476394 26-Aug-1 04-Jun-07 191200060128 01-Oct-1(28-Jun-1(CT00058)191200069626 01-Mar-106-Mar-0 191307586474 02-Jun-1€11-Dec-1'CT00003,191308893631 02-Feb-1:23-Sep-1(CT00001(191308984327 28-Jul-15 16-Oct-14 CT00001f 191308994561 01-Aug-1 18-Jan-17CT00073 191311647909 08-Feb-1 28-Oct-1(CT00073 191311652181 23-Jan-1722-Aug-1: CT00073: 191311659042 18-Dec-1: 12-Sep-1: CT00073: 191311750212 30-Sep-1(23-Nov-1 CT00085(183600586945 11-Jul-17 29-Mar-1 CT00073 191315548668 08-Dec-1(19-Apr-1(CT00073(191315640420

3722	SUMMER SPRINGS DR	OXFORD NC 27565	Pamlico
2983	HALLIE BURNETTE RD		Pamlico
6072	CORNWALL ROAD	OXFORD NC 27565	Pamlico
3179	KELLER LANE	OXFORD NC 27565	Pamlico
3181	KELLER LANE	OXFORD NC 27565	Pamlico
6115	WILD CHERRY LANE	OXFORD NC 27565	Pamlico
6114	WILD CHERRY LN	OXFORD NC 27565	Pamlico
2582 2608B	BODIE CURRIN ROAD	OXFORD NC 27565	Pamlico
26086	BODIE CURRIN ROAD BODIE CURRIN	OXFORD NC 27565	Pamlico
2614 6123	CORNWALL RD	OXFORD NC 27565 OXFORD NC 27565	Pamlico Pamlico
2672	BODIE CURRIN ROAD	OXFORD NC 27565	Pamilico
6153	CORNWALL ROAD	OXFORD NC 27565	Pamlico Pamlico
6659	CORNWALL ROAD	OXFORD NC 27565	Roanöke
6503	CORNWALL ROAD	OXFORD NC 27565	Pamlico
7115	CORNWALL RD	OXFORD NC 27565	Roanoke
7001	GREENWAYRD	OXFORD NC 27565	Roanoke
2699	HENRY WILSON ROAD	OXFORD NC 27565	Roanoke
2705	HENRY WILSON ROAD	OXFORD NC 27565	Roanoke
2539	EVANS FRAZIER RD	OXFORD NC 27565	Roanoke
7643	CORNWALL RD	OXFORD NC 27565	Roanoke
2567	GELA RD	OXFORD NC 27565	Roanoke
2571	GELA RD	OXFORD NC 27565	Roanoke
2572	HOMESTEAD DRIVE	OXFORD NC 27565	Roanoke
7530	CORNWALL RD	OXFORD NC 27565	Roanoke
7715	EAKES ROAD	OXFORD NC 27565	Roanoke
7607	ETTA DB	OXFORD NC 27565	Roanoke
7686	EAKES RD	OXFORD NC 27565	Roanoke
7703	SAM HALL ROAD	OXFORD NC 27565	Roanoke
7569	SAM HALL ROAD	OXFORD NC 27565	Roanoke
7633	SAM HALL ROAD	OXFORD NC 27565	Roanoke
2625	LIGHTHOUSE TRAIL	OXFORD NC 27565	Roanoke
2609	LITTLE MOUNTAIN CREEK RD	OXFORD NC 27565	Roanoke
2596	LITTLE MOUNTAIN CREEK RD	OXFORD NC 27565	Roanoke
2616	DAVIS CHAPEL RD	OXFORD NC 27565	Roanoke
2652	LITTLE MOUNTAIN CREEK RD	OXFORD NC 27565	Roanoke
4291	SUSTAIN CIRCLE	FRANKLINTON NC	Pamlico
2694	LITTLE MOUNTAIN CREEK RD	OXFORD NC 27565	Roanoke
2710	DAVIS CHAPEL RD	OXFORD NC 27565	Roanoke
2721	DAVIS CHAPEL ROAD	OXFORD NC 27565	Roanoke
2713	DAVIS CHAPEL RD	OXFORD NC 27565	Roanoke
4162F	HIGHWAY 15	OXFORD NC	Pamlico
4162 VV	HWY 15 SOUTH	OXFORD NC 27565	Pamlico
4188BB	HWY 15 SOUTH	OXFORD NC 27565	Pamlico
4132	WHITE OAK DRIVE	OXFORD NC 27565	Pamlico
4709	BELLTOWN RD	OXFORD NC 27565	Pamlico
3002	HALLIE BURNETTE RD	OXFORD NC 27565	Pamlico
3011	HALLIE BURNETTE ROAD	OXFORD NC 27565	Pamlico
1312	GOSHEN ST	OXFORD NC 27565	Pamlico
129	CREEKSIDE DRIVE	OXFORD NC 27565	Pamlico
202	DELACROIX STREET	OXFORD NC 27565	Pamlico
116	RAYLAND STREET	OXFORD NC 27565	Pamlico
	LEXINGTON PARK DRIVE		Pamlico
111	YEARLING WAY	OXFORD NC 27565	Pamlico
201	LEXINGTON PARK DRIVE	OXFORD NC 27565	Pamlico
201	KEENELAND DRIVE	OXFORD NC 27565	Pamilico
4294	SUSTAIN CIRCLE	FRANKLINTON NC	Pamlico
101	BLUEGRASS DRIVE	OXFORD NC 27565	Pamlico
100	BLUEGRASS DRIVE	OXFORD NC 27565	Pamlico

BD00969 PR13646/ U2017-0027 10-Jan-1710-Jan-17 Contractor NEW HOUSE BD00872: PR13595; U2016-0048 12-Jan-1£12-Jan-1£ Contractor NEW HOUSE BD00795/PR13535(U2014-1231 04-Dec-1/04-Dec-1/Contractor NEW HOUSE BD00806/PR13546/U2015-0197 03-Mar-1 03-Mar-1 Contractor NEW HOUSE BD00760' PR13504! U2014-0484 13-May-113-May-1 Contractor NEW HOUSE BD00981 PR13652(U2017-0203 16-Feb-1: 16-Feb-1: Contractor NEW HOUSE BD01019 PR13669!U2017-0766 06-Jul-17 06-Jul-17 Contractor NEW HOUSE BD01073/PR13695/U2018-0134 13-Feb-1/13-Feb-1/Contractor NEW HOUSE BD00697 PR13405(U2013-0420 13-May-113-May-1 Contractor NEW HOUSE BD00869 PR13580: U2015-1381 18-Dec-1/18-Dec-1/Contractor NEW HOUSE BD00824: PR13536(U2015-0545 02-Jun-1502-Jun-15 Contractor NEW HOUSE BD01072'PR13695/U2018-0133 13-Feb-1/13-Feb-1/Contractor NEW HOUSE BD01049 PR13683(U2017-1193 23-Oct-1: 23-Oct-1: Contractor NEW HOUSE BD01050/PR13683!U2017-1194 23-Oct-1723-Oct-17Contractor NEW HOUSE BD01054 PR13685(U2017-1267 09-Nov-1 09-Nov-1 Contractor NEW HOUSE BD00624/PR13345;U2011-0959 20-Dec-1 20-Dec-1 Contractor NEW HOUSE BD01040 PR13679(U2017-1059 21-Sen-1 21-Sen-1 Contractor NEW HOUSE BD01040: PR13679! U2017-1058 21-Sep-1: 21-Sep-1: Contractor NEW HOUSE BD00763; PR13506{U2014-0535 29-May-129-May-1 Contractor NEW HOUSE BD00547/PR11131(U2010-0679 06-Aug-1/06-Aug-1/Contractor NEW HOUSE BD00664 PR13390(U2012-0767 17-Sep-1:17-Sep-1:Contractor NEW HOUSE BD00961 PR11726/U2016-1530 01-Dec-1(01-Dec-1) Contractor NEW HOUSE BD00670'PR13399'U2012-0905 07-Nov-1 07-Nov-1 Contractor NEW HOUSE BD00623 PR13344; U2011-0948 15-Dec-1 15-Dec-1 Contractor NEW HOUSE BD00551:PR13267!U2010-0774 02-Sep-1(02-Sep-1(Owner MOBILE HOME BD00842(PR13498:U2015-0909 21-Aug-1:21-Aug-1:Owner MOBILE HOME BD00747 PR13478(U2014-0239 14-Mar-114-Mar-1 Other MOBILE HOME BD00993(PR12340) U2017-0377 30-Mar-1 30-Mar-1 Other MODULAR HOME BD00474: PR13182(U2009-0633 17-Aug-0'17-Aug-0'Owner MOBILE HOME BD00562 PR13279: U2010-0961 02-Nov-1 02-Nov-1 Owner MOBILE HOME BD00530: PR13222: U2010-0420 18-May-118-May-1Contractor NEW HOUSE BD00521 PR13224(U2010-0274 31-Mar-131-Mar-1 Contractor MODULAR HOME BD00639 PR13356 U2012-0281 12-Apr-1:12-Apr-1: Other MOBILE HOME BD00745(PR13482(U2014-0174 25-Feb-1/25-Feb-1/Contractor MOBILE HOME BD00905 PR10863{U2016-0615 13-May-113-May-1Contractor MODULAR HOME BD00512 PR13217 U2010-0148 22-Feb-1(22-Feb-1(Owner MOBILE HOME BD00531'PR13244(U2010-0432 24-May-124-May-1 Other MOBILE HOME BD00488 PR13202⁻U2009-0841 19-Oct-0(19-Oct-0) Contractor MODULAR HOME BD00598 PR13321: U2011-0455 22-Jun-1122-Jun-11Owner MOBILE HOME BD01002 PR12239(U2017-0502 02-May-102-May-1Other MOBILE HOME BD00984 PR12455, U2017-0259 28-Feb-1 28-Feb-1 Contractor MOBILE HOME BD01030/PR12689:U2017-0921 10-Aug-1 10-Aug-1 Contractor MOBILE HOME BD00975' PR12749: U2017-0128 02-Feb-1: 02-Feb-1: Contractor MODULAR HOME BD01004 PR11338/ U2017-0520 04-May-104-May-1Contractor MODULAR HOME BD00532 PR13241(U2010-0453 02-Jun-1(02-Jun-1(Other MOBILE HOME BD00575; PR13228; U2011-0098 21-Feb-1; 21-Feb-1; Owner NEW HOUSE BD00502/PR13218/U2010-0023 11-Jan-1C11-Jan-1COwner MOBILE HOME BD00514 PR13229(U2010-0184 08-Mar-108-Mar-10wner MOBILE HOME BD00686 PR13415{U2013-0201 01-Mar-101-Mar-1 Contractor MOBILE HOME BD00862: PR13584: U2015-1270 16-Nov-1 16-Nov-1 Contractor NEW HOUSE BD00927 PR12970(U2016-0958 01-Aug-1)01-Aug-1(Contractor MODULAR HOME BD00600' PR13263/ U2011-0505 06-Jul-11 06-Jul-11 Owner NEW HOUSE BD00516 PR13229:U2010-0212 12-Mar-112-Mar-1 Other MOBILE HOME BD01013 PR13666: U2017-0673 14-Jun-1714-Jun-17 Contractor NEW HOUSE BD00645 PR13021(U2012-0407 24-May-124-May-1 Contractor NEW HOUSE BD00502: PR13206: U2010-0028 12-Jan-1C12-Jan-1C Contractor NEW HOUSE BD00876/PR13564: U2016-0121 01-Feb-1(01-Feb-1(Contractor MODULAR HOME BD00776 PR13501; U2014-0825 14-Aug-1-14-Aug-1-Owner NEW HOUSE BD00990 PR13275{U2017-0344 23-Mar-123-Mar-1 Contractor NEW HOUSE

24-May-106-Jan-16 CT00073! 191315641327 24-Jul-15 01-Dec-1 CT00073 191315641627 08-Mar-1 02-Mar-1 CT00073 191315642325 14-Aug-1/12-May-1CT00073[191315643324 02-May-115-Feb-1 CT00073 191315647832 06-Oct-1729-Jun-17CT00073 191315649838 11-lun-1812-Feb-18CT00073*191315742990 13-Sep-1: 13-May-1 CT00042: 191315744229 14-Sep-1(04-Nov-1 CT00166(183600586945 29-Mar-102-Jun-15CT001205183600058963 11-Jun-1812-Feb-18CT00073191315753000 12-Feb-1(11-Oct-1) CT00073(191316746579 05-Mar-1 26-Mar-1 11-Oct-1. CT00073* 191316746930 27-Mar-108-Nov-1 CT00073 191316747762 25-Oct-1; 14-Dec-1 CT00098(181300280040 11-Apr-1{18-Sep-1:CT00042:191319628454 21-May-118-Sep-1:CT00042:191319629305 27-Oct-1/28-May-1CT00073 191319645976 21-Oct-1(05-Aug-1(CT00001(191320820100 07-May-117-Sep-1;CT00111{181300280040 20-Jul-17 30-Nov-1 CT00001(191400215627 05-Aug-1.07-Nov-1 CT00001(191400217575 23-Apr-1:08-Dec-1 CT00077{181300280040 27-Sep-1000:00:00 191500082803 26-Oct-15 00:00:00 191500089797 28-May-14 00:00:0 CT00013;191502991383 18-Aug-1 29-Mar-1 191504906698 10-Oct-11 00:00:00 191504926957 17-Feb-11 00:00:00 191600007734 14-Dec-1(17-May-1CT00051(191600019289 19-Nov-1-25-Mar-1 CT00022' 191600041551 19-Apr-12 00:00:00 CT00013{ 191600100508 03-Apr-1400:00:00 191600102076 13-Feb-1:01-Feb-1(CT00176:191600313587 09-Mar-10 00:00:00 191600328537 16-Aug-10 00:00:0(CT00014(191600411830 11-Feb-1(14-Oct-05 191600416784 08-Jul-11 00:00:00 CT00014(191600428783 17-Jul-17 00:00:00 CT00073, 191602794615 08-Jun-17 00:00:00 CT00081; 191604532101 11-Jan-18 00:00:00 CT00081/191604803551 11-May-1 31-Jan-17 CT00163: 191604901156 24-Aug-1 28-Apr-1, CT00081, 191604932098 14-Sep-1000:00:00 CT00014(191700013898 20-Sep-1:21-Feb-1:CT00077;191700355542 03-Mar-10 00:00:00 191700629050 14-Jun-10 00:00:00 CT00013; 191700710740 20-May-13 00:00:0 CT00013: 191700711463 25-Jul-16 16-Nov-1 CT00001(191700746894 17-Nov-1 28-Jul-16 CT00165: 191700808584 22-Aug-1.20-Jun-11CT00077,191700976202 15-Jul-1000:00:00 191800126488 26-Jan-1812-Jun-17CT00001(191800582468 22-Mar-1 22-May-1 CT00010: 191800647837 29-Oct-1(11-Jan-1C CT00010: 191800824306 07-Jun-1f 01-Feb-1f CT00020f 191900107633 28-Aug-1:12-Aug-1 CT00077 191900123391 16-Oct-1; 24-Mar-1 CT00001(191900489446

08-May-106-Jan-17CT00073 191315640619

103	BLUEGRASS DRIVE		Pamlico
102	BLUEGRASS DRIVE	OXFORD NC 27565	Pamlico
105	BLUEGRASS DRIVE	OXFORD NC 27565	Pâmlico
104	BLUEGRASS DRIVE	OXFORD NC 27565	Pamlico
106	BLUEGRASS DRIVE	OXFORD NC 27565	Pamlico
205	LEXINGTON PARK DRIVE	OXFORD NC 27565	Pamlico
203	LEXINGTON PARK DRIVE	OXFORD NC 27565	Pamlico
319	KEENELAND DRIVE	OXFORD NC 27565	Pamlico
104	DOVE ROAD	OXFORD NC 27565	Pamlico
4290	SUSTAIN CIRCLE		Pamlico
2108	TURQUOISE LANE	FRANKLINTON NC	Pamlico
200	321 KEENELAND DRIVE	OXFORD NC 27565	Pamlico
306	KEENELAND DRIVE	OXFORD NC 27565	Pamlico
214	KEENELAND DRIVE	OXFORD NC 27565	Pamlico
220	KEENELAND DRIVE	OXFORD NC 27565	Pamlico
3040	VESTERBY DRIVE	CREEDMOOR NC	Neuse
108	MOORELAND DRIVE		Pamlico
106	MOORELAND DRIVE		Pamlico
	LEXINGTON PARK DRIVE	OXFORD NC 27565	Pamlico
123	KEARNEY AVE	OXFORD NC 27565	Pamlico
3042	VESTERBY DRIVE	CREEDMOOR NC	Neuse
6051	HIGHWAY 96	OXFORD NC 27565	Pamlico
6035	HIGHWAY 96	OXFORD NC 27565	Pamlico
653	WILLARD DRIVE	CREEDMOOR NC	Neuse
6744	GREENWAY RD	OXFORD NC 27565	Roanoke
6746	LEANING OAK ROAD	OXFORD NC 27565	Roanoke
6693 6225	HIGHWAY 15	OXFORD NC 27565	Roanoke
	CAROLE DRIVE	OXFORD NC 27565	Pamlico
6551	HIGHWAY 15	OXFORD NC 27565	Pamlico
7014 7020	GREENWAY ROAD GREENWAY RD	OXFORD NC 27565 OXFORD NC 27565	Roanoke
3001	HENRY WILSON RD	OXFORD NC 27565 OXFORD NC 27565	Roanoke
6771	LEANING OAK ROAD	OXFORD NC 27565	Roanoke Roanoke
3010	SPLIT WOOD CT	OXFORD NC 27565	Roanoke
7115	HAMPTON RD	OXFORD NC 27565	Roanoke
7072	BAYBERRY DRIVE	OXFORD NC 27565	Roanoke
7084	BAYBERRY DRIVE	OXFORD NC 27565	Roanoke
7085	BAYBERRY DRIVE	OXFORD NC 27565	Roanoke
7100	PORTER DRIVE	OXFORD NC 27565	Roanoke
3150B	GELA BD	OXFORD NC 27565	Roanoke
3118	HENRY WILSON RD	0210101027505	Roanoke
7019	SOUTHERN CT	OXFORD NC 27565	Roanoke
7001	HIGHWAY 15	OXFORD NC 27565	Roanoke
3201	HENRY WILSON RD	OXFORD NC 27565	Roanoke
	SAM HALL ROAD	OXFORD NC 27565	Roanoke
7609	SAM YOUNG ROAD	OXFORD NC 27565	Roanoke
7557	SAM YOUNG ROAD	OXFORD NC 27565	Roanoke
7547	SAM YOUNG ROAD	OXFORD NC 27565	Roanoke
7539	SAM YOUNG ROAD	OXFORD NC 27565	Roanoke
7628	SAM YOUNG ROAD	OXFORD NC 27565	Roanoke
3185	GELA RD	OXFORD NC 27565	Roanoke
1956	POWELL ROAD	OXFORD NC 27565	Roanoke
3044	LITTLE MOUNTAIN CREEK RD	OXFORD NC 27565	Roanoke
8228	CRAWFORD CURRIN ROAD	OXFORD NC 27565	Roanoke
8095	CRAWFORD CURRIN RD	OXFORD NC 27565	Roanoke
8068	CRAWFORD CURRIN RD	OXFORD NC 27565	Roanoke
3026	DAVIS CHAPEL RD	OXFORD NC 27565	Roanoke
3039	DAVIS CHAPEL ROAD	OXFORD NC 27565	Roanoke
8710	GRASSY CREEK ROAD	OXFORD NC 27565	Roanoke

BD00582 PR13300: U2011-0192 23-Mar-1 23-Mar-1 Contractor MODULAR HOME BD00579 PR132728U2011-0160 14-Mar-114-Mar-1 Owner NEW HOUSE BD00569 PR13033 (U2010-1099 20-Dec-1 / 20-Dec-1 / Owner MOBILE HOME BD00831 PR10561/U2015-0677 30-Jun-1530-Jun-15Contractor MODULAR HOME BD00567 PR13274(1)2010-1054 06-Dec-1(06-Dec-1(Owner MOBILE HOME BD00913 PR13429 U2016-0743 13-Jun-1613-Jun-16 Contractor NEW HOUSE BD00864 PR12252{U2015-1302 25-Nov-1 25-Nov-1 Contractor NEW HOUSE BD00769: PR13509{U2014-0658 08-Jul-14 08-Jul-14 Contractor NEW HOUSE BD00675/PR13399(U2012-1001 05-Dec-1:05-Dec-1:Contractor NEW HOUSE BD00661 PR13362; U2012-0725 05-Sep-1; 0S-Sep-1; Contractor NEW HOUSE BD00507 PR13224 U2010-0094 02-Feb-1(02-Feb-1(Owner MOBILE HOME BD01049 PR100714U2017-1185 19-Oct-1719-Oct-17 Contractor MODULAR HOME BD01047: PR10118; U2017-1163 13-Oct-1; 13-Oct-1; Contractor NEW HOUSE BD01025/PR13672/U2017-0853 21-Jul-17 21-Jul-17 Contractor NEW HOUSE BD01025 PR13672 U2017-0854 21-Jul-17 21-Jul-17 Contractor NEW HOUSE BD01025 PR13672 U2017-0852 21-Jul-17 21-Jul-17 Contractor NEW HOUSE BD01025 PR13672; U2017-0850 21-Jul-17 21-Jul-17 Contractor NEW HOUSE BD01003' PR13663' U2017-0519 04-May-104-May-1 Contractor NEW HOUSE BD01003: PR13663(U2017-0518 04-May-104-May-1 Contractor NEW HOUSE BD00722 PB10052 U2013-0900 17-Sep-1: 17-Sep-1: Contractor NEW HOUSE BD00897 PR13597: U2016-0502 20-Apr-1(20-Apr-1(Contractor NEW HOUSE BD00522(PR10034!U2010-0281 01-Apr-1(01-Apr-1(Contractor NEW HOUSE BD00874(PR13596(1)2016-0071 19-Jan-1619-Jan-16Contractor MULTIPLE FAMILY DWLS BD00488 PR13204: U2009-0844 19-Oct-0: 19-Oct-0: Contractor NEW HOUSE BD00783: PR11687: U2014-0956 24-Sep-1/ 24-Sep-1/ Contractor NEW HOUSE BD00842 PR11284(U2015-0918 24-Aug-1 24-Aug-1 Contractor NEW HOUSE BD00581 PR13301 U2011-0183 18-Mar-118-Mar-1 Contractor NEW HOUSE BD00958 PR13641(U2016-1485 17-Nov-1 17-Nov-1 Contractor MODULAR HOME BD00790 PR11094(U2014-1114 31-Oct-1/31-Oct-1/Contractor NEW HOUSE BD00991, PR11867{U2017-0359 27-Mar-127-Mar-1 Contractor MOBILE HOME BD00631: PR13355/ U2012-0120 20-Feb-1: 20-Feb-1: Contractor MODULAR HOME BD00494: PR13206: U2009-0926 17-Nov-0 17-Nov-0 Contractor MOBILE HOME BD00851;PR13578(U2015-1090 02-Oct-1:02-Oct-1:Contractor NEW HOUSE BD01026: PR13672: U2017-0871 26-Jul-17 26-Jul-17 Contractor NEW HOUSE BD00970 PR13646/U2017-0038 12-Jan-1712-Jan-17Contractor NEW HOUSE BD00975(PR13649(U2017-0108 30-Jan-1730-Jan-17Contractor NEW HOUSE BD00974'PR13649/U2017-0107 30_Jan-1730-Jan-17Contractor NEW HOUSE BD00969(PR13646(U2017-0036 12-Jan-1712-Jan-17Contractor NEW HOUSE BD00970/PR13646:U2017-0037 12-Jan-1712-Jan-17Contractor NEW HOUSE BD00974; PR13649: U2017-0106 30-Jan-1730-Jan-17 Contractor NEW HOUSE BD00571(PR13289(U2011-0026 18-Jan-1118-Jan-11Contractor NEW HOUSE BD00570 PR13289 U2011-0016 07-Jan-1107-Jan-11 Contractor NEW HOUSE BD00655 PR13382(U2012-0597 26-Jul-12 26-Jul-12 Contractor NEW HOUSE BD00628/PR133511U2012-0066 27-Jan-1227-Jan-12Contractor NEW HOUSE BD00919 PR13623(U2016-0833 05-Jul-16 05-Jul-16 Contractor NEW HOUSE BD00969; PR13646; U2017-0035 12-Jan-1712-Jan-17 Contractor NEW HOUSE BD00919 PR13623 U2016-0834 05-Jul-16 05-Jul-16 Contractor NEW HOUSE BD00877 PR13598{U2016-0128 02-Feb-1(02-Feb-1(Contractor NEW HOUSE BD00942/PR13634/U2016-1186 20-Sep-1/20-Sep-1/Owner NEW HOUSE BD00655' PR13382(U2012-0599 26 Jul-12 26-Jul-12 Contractor NEW HOUSE BD00655; PR13382(U2012-0598 26-Jul-12 26-Jul-12 Contractor NEW HOUSE BD00565 PR13008 U2010-1023 23-Nov-1 23-Nov-1 Other MOBILE HOME BD00608: PR13328! U2011-0640 24-Aug-1 24-Aug-1 Owner MOBILE HOME BD00946 PR12558; U2016-1244 03-Oct-1f03-Oct-1fContractor MODULAR HOME BD00754 PR13495:U2014-0372 17-Apr-1/17-Apr-1/Contractor MOBILE HOME BD00517 PR13232 U2010-0225 16-Mar-1 16-Mar-1 Owner MOBILE HOME BD00785/PR12757/U2014-1008 06-Oct-1/06-Oct-1/ Owner MOBILE HOME BD01087 PR12565 U2018-0339 09-Apr-1 {09-Apr-1 {Contractor MOBILE HOME BD00735 PR13286: U2013-1177 26-Nov-1 26-Nov-1 Owner MOBILE HOME

24-May-116-Mar-1 CT00081; 191900571991 26-Aug-16 00:00:0(CT00077; 191900586414 2 3-Jun-11 00:00:00 CT00077; 191900692573 29-Sep-1!22-Jun-15CT00058{191900692573 20-Dec-1000:00:00 192000135024 08-Dec-1(01-Jun-1(CT00120) 192000216989 02-Aug-1:25-Nov-1 CT00022, 192000372718 18-Dec-1: 29-May-1 CT00143; 192000592358 27-Jun-1:04-Dec-1. CT00022: 192100270518 13-Dec-1.05-Sep-1.CT00001(192100362949 09-Feb-10.00:00:00 192100461781 06-Mar-1 13-Oct-17CT00020(192100567510 12-Feb-120-Jan-17CT00046(192202565346 02-Oct-1;26-Jun-1;CT00192(192203430170 05-Oct-1: 26-lun-1; CT00192(192203430272 05-Oct-1;26-Jun-1;CT00192(192203431000 05-Oct-1726-Jun-17CT001925192203432054 14-Aug-1 24-Apr-1 CT00192(192203433025 14-Aug-1 24-Apr-1 CT00192 192203433097 26-Mar-116-Sep-1: CT00001(192204513113 21-Oct-1(27-Jan-1(CT00166)192204607215 05-Oct-12 00:00:00 CT00083 192206382860 27-Apr-1:19-Jan-16 CT00169(192209070303 26-May-116-Oct-01 CT00001 192302556310 03-Sep-1! 22-Sep-1/ CT00001: 192310460132 04-Nov-1 24-Aug-1 CT00075(192313146563 11-Jul-11 17-Mar-1 CT00001(192314345302 13-Mar-1 14-Nov-1 CT00163' 192316941447 07-Jan-1€30-Oct-1/CT00001€192317113054 06-Jul-17 00:00:00 CT000138 192400891465 21-May-1 10-Feb-1; CT00081; 192401055497 29-Jan-10 00:00:00 CT00041: 192401176188 21-Apr-1(30-Sep-1)CT00001(192404813729 31-Oct-1, 20-Jul-17 CT00053: 192404821860 26-Apr-1,15-Dec-1(CT00053,192404823616 31-May-117-Jan-17CT00053:192404825791 31-May-117-Jan-17CT00053-192404826736 26-Apr-1:09-Dec-1(CT00010;192404826861 24-May-109-Dec-1(CT00053: 192404826896 24-May-117-Jan-17CT00053:192404827920 29-Jul-11 14-Jan-11CT00020:192404830294 06-Jul-11 06-Jan-11 192404831379 14-Dec-1: 20-Jul-12 CT00020: 192404832199 22-May-1 2 6-Jan-12 CT00020: 192404833950 04-Oct-1f14-Jun-1fCT00053:192404836411 31-May-109-Dec-1(CT00053: 192404837368 25-Oct-1(22-Jun-1(CT00053:192404837411 09-Nov-1 01-Feb-1(CT00090(192404845111 14-Nov-1 16-Sep-1(CT00077, 192404846003 05-Mar-126-Jul-12 CT00020: 192404934677 05-Mar-1 26-Jul-12 CT00020: 192404934795 09-Dec-1000:00:0CT00013(192500052599 21-Sep-11 00:00:00 CT00077; 192500064232 07-Feb-1:23-Sep-1(CT00163: 192500065851 06-Jun-14 00:00:00 CT00065! 192500066027 23-Apr-10 00:00:00 192500074693 15-May-15 00:00:00 192500075965 29-May-18 00:00:0 CT00081/192500078369 02-May-14 00:00:0 CT00013; 192500079160

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6651

3514

GRASSY CREEK ROAD	BULLOCK NC 27507	Roanoke
GRASSY CREEK ROAD	OXFORD NC 27565	Roanoke
GRASSY CREEK RD		Roanoke
GRASSY CREEK RD	BULLOCK NC	Roanoke
HWY 96 SOUTH	OXFORD NC 27565	Pamlico
HIGHWAY 96	OXFORD NC 27565	Pamlico
HIGHWAY 96	OXFORD NC 27565	Pamlico
TOMMIE SNEED RD	OXFORD NC 27565	Pamlico
FIELDING KNOTT RD	OXFORD NC 27565	Pamlico
FIELDING KNOTT RD HIGHWAY 96	OXFORD NC 27565	Pamlico
	OXFORD NC 27565	Pamlico
FAIRPORT RD	OXFORD NC 27565	Pamlico
RALEIGH ROAD POLLY DRIVE	OXFORD NC 27565	Pamlico
POLLY DRIVE	OXFORD NC 27565	Pamlico
POLLY DRIVE		Pamlico
POLLY DRIVE	OXFORD NC 27565 OXFORD NC 27565	Pamlico
POLLY DRIVE	OXFORD NC 27565	Pamlico Pamlico
POLLY DRIVE	OXFORD NC 27565	わくつけん ちょうちょう
HIGHWAY 96		Pamlico
FAIRPORT RD	OXFORD NC 27565 OXFORD NC 27565	Pamlico
WILMINGTON AVENUE		Pamlico
INDUSTRY DRIVE	OXFORD NC 27565	Pamlico
WOODLAND DRIVE	OXFORD NC 27565	Pamlico
PINE CONE DRIVE	OXFORD NC 27565	Pamlico
LANIER ST	OXFORD NC 27565 OXFORD NC 27565	Pamlico
WILLIAMSBORO STREET	OXFORD NC 27565	Pamlico
DENARD STREET	OXFORD NC 27565	Pamlico Pamlico
LINDEN AVE	OXFORD NC 27565 OXFORD NC 27565	
HORNER SIDING RD	OXFORD NC 27565 OXFORD NC 27565	Pamlico Pamlico
HIGHWAY 15	OXFORD NC 27505	
		Pamlico
SMITHWOOD DRIVE SALEM ROAD	OXFORD NC 27565	Pamlico
	OXFORD NC 27565	Pamlico
	OXFORD NC 27565	Pamlico
	OXFORD, NC 27565	Pamlico
KIPLING DRIVE KIPLING DRIVE	OXFORD NC 27565	Pamlico
	OXFORD NC 27565	Pamlico
KIPLING DRIVE KIPLING DRIVE	OXFORD, NC 27565	Pamlico
KIPLING DRIVE	OXFORD, NC 27565	Pamlico
OXFORD PARK BLVD	OXFORD NC 27565	Pamlico
OXFORD PARK BLVD	OXFORD NC 27565	Pamlico
OXFORD PARK BLVD	OXFORD, NC 27565	Pamlico
WINDSOR COURT	OXFORD NC 27565	Pamlico
	OXFORD, NC	Pamlico
KIPLING DRIVE	OXFORD NC 27565 OXFORD. NC 27565	Pamlico
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WINDSOR COURT	OXFORD NC 27565	Pamlico
WINDSOR COURT	OXFORD NC 27565 OXFORD NC 27565	Pamlico Pamlico
CAMBRIDGE WAY	OXFORD NC 27565	Pamlico Pamlico
CAMBRIDGE WAY		North State
CLEARWATER DR	OXFORD NC 27565	Pamlico
CLEARWATER DR	OXFORD NC	Pamlico
ROUNDSTONE LANE		Pamlico
CLEARWATER DR	OXFORD NC 27565	Pamlico
	OXFORD NC 27565	Pamlico
CHEWNING RD	OXFORD NC 27565	Pamlico
BRIARWOOD DRIVE		Pamlico
CHEWNING RD	OXFORD NC 27565	Pamlico
ROUNDSTONE LANE	OXFORD NC 27565	Pamlico

BD00610 PR13315 U2011-0691 15-Sep-1:15-Sep-1: Owner MOBILE HOME BD00692(PR13423)U2013-0309 09-Apr-1:09-Apr-1:Contractor MOBILE HOME BD01036 PR13600(U2017-1009 07-Sep-1:07-Sep-1: Contractor MODULAR HOME BD00891'PR13596'U2016-0391 29-Mar-1 29-Mar-1 Contractor MODULAR HOME BD00711 PR13434 U2013-0659 09-Jul-13 09-Jul-13 Contractor NEW HOUSE BD00532 PR13242 U2010-0448 27-May-127-May-1 Other MOBILE HOME BD00848' PR1356S, U2015-1035 18-Sep-1'18-Sep-1'Owner MOBILE HOME BD00895 PR13565 U2016-0467 13-Apr-1(13-Apr-1(Contractor MOBILE HOME BD00857/PR12294: U2015-1187 26-Oct-1: 26-Oct-1: Contractor MOBILE HOME BD00699 PR13433 U2013-0457 24-May-124-May-1 Owner MOBILE HOME BD00645| PR13363{ U2012-0395 21-May-121-May-1Owner MOBILE HOME BD00893' PR11891' U2016-0431 05-Apr-1(05-Apr-1(Owner MOBILE HOME BD01043(PR10683(U2017-1097 02-Oct-1;02-Oct-1; Other MOBILE HOME BD00677 PR13383(U2012-1035 17-Dec-1, 17-Dec-1, Owner MOBILE HOME BD00530/PR13234-U2010-0261 12-May-126-Mar-1 Contractor MOBILE HOME BD00974 PR13556(U2017-0099 27-Jan-1727-Jan-17Contractor NEW HOUSE BD00569 PR13287 U2010-1106 22-Dec-1(22-Dec-1(Contractor MOBILE HOME BD00511/PR13222; U2010-0140 19-Feb-1(19-Feb-1(Owner MOBILE HOME BD00982 PR11891(U2017-0226 22-Feb-1 22-Feb-1 Contractor NEW HOUSE BD01008 PR11854'112017-0582 19-May-119-May-1 Owner MOBILE HOME BD00821 PR13555{U2015-0497 20-May-120-May-1 Owner NEW HOUSE BD00658 PR13354 U2012-0649 10-Aug-1 10-Aug-1 Contractor MODULAR HOME BD010S1, PR10593112017-1208 25-Oct-1225-Oct-12 Contractor NEW HOUSE BD00575(PR13294) U2011-0083 14-Feb-1: 14-Feb-1: Contractor MODULAR HOME BD00477; PR13192{U2009-0681 31-Aug-0; 31-Aug-0; Owner MOBILE HOME BD00514/PR13201(U2010-0180 03-Mar-103-Mar-1 Owner NEW HOUSE BD01027/PR13673: U2017-0885 01-Aug-1 01-Aug-1 Contractor NEW HOUSE BD00547 PR13261{U2010-0680 06-Aug-106-Aug-1Contractor MODULAR HOME BD00790 PR10579! U2014-1121 03-Nov-1 03-Nov-1 Contractor NEW HOUSE BD00770/PR13509(U2014-0666 08-Jul-14 08-Jul-14 Owner MOBILE HOME BD00613 PR13334(U2011-0754 10-Oct-1)10-Oct-1)Owner MOBILE HOME BD00877/ PR133345U2016-0131 02-Feb-1f02-Feb-1fOther MOBILE HOME BD00926 PR13595{U2016-0943 27-Jul-16 27-Jul-16 Contractor NEW HOUSE BD00648 PR13373(U2012-0451 11-Jun-1211-Jun-12Contractor NEW HOUSE BD00907(PR13616(U2016-0636 19-May-119-May-1 Contractor NEW HOUSE BD00807: PR13541(U2015-0222 11-Mar-111-Mar-1 Contractor MODULAR HOME BD00698 PR13332(U2013-0432 17-May-117-May-1 Contractor NEW HOUSE BD00797(PR13534(U2014-1279 16-Dec-1/16-Dec-1/Contractor NEW HOUSE BD00797 PR13529(U2014-1284 16-Dec-1/16-Dec-1/Contractor NEW HOUSE BD00738 PR13466(U2013-1262 30-Dec-1 30-Dec-1 Contractor NEW HOUSE BD00738 PR13466 U2013-1263 30-Dec-1.30-Dec-1 Contractor NEW HOUSE BD01010 PR13502{U2017-0621 31-May-131-May-1Contractor NEW HOUSE BD00467 PR13178(U2009-0547 23-Jul-09 23-Jul-09 Contractor NEW HOUSE BD00939 PR13624/ U2016-1126 07-Sep-1(07-Sep-1(Contractor NEW HOUSE BD00624 PB13347 U2012-0006 05-Jan-12 05-Jan-12 Owner NEW HOUSE BD00763 PR13500 U2014-0537 29-May-129-May-1 Contractor NEW HOUSE BD00722 PR13458 U2013-0905 18-Sep-1: 18-Sep-1: Other MOBILE HOME BD00857 PR13312(U2015-1188 27-Oct-1: 27-Oct-1: Contractor MOBILE HOME BD00597 PR13257 U2011-0447 20-Jun-1120-Jun-11 Contractor NEW HOUSE BD00954 PR13001 U2016-1414 03-Nov-1 03-Nov-1 Owner NEW HOUSE BD00627-PR13346(U2012-0054 24-Jan-1224-Jan-12Contractor NEW HOUSE BD00762 PR13490 U2014-0520 20-May-120-May-1 Contractor NEW HOUSE BD00728 PR13446/ U2013-1021 17-Oct-1: 17-Oct-1: Contractor MODULAR HOME BD00917(PR10048(U2016-0806 27-Jun-1f 27-Jun-1f Contractor NEW HOUSE BD00580 PR13301(U2011-0175 17-Mar-117-Mar-1 Owner MOBILE HOME BD00688/PR13341/U2013-0239 14-Mar-114-Mar-1 Contractor NEW HOUSE BD00587: PR13308: U2011-0282 28-Apr-1: 28-Apr-1: Contractor NEW HOUSE BD00869/PR13561/U2015-1389 21-Dec-1/21-Dec-1/Contractor MODULAR HOME BD00643-PR13366(U2012-0356 02-May-102-May-1Contractor NEW HOUSE

22-Feb-12 00:00:0C CT00077; 192500098850 18-Apr-1300:00:00CT00013;192500098850 14-Feb-1/15-Aug-1 CT00129(192500182655 13-May-129-Mar-1 192500186584 17-Oct-1:09-Jul-13 CT00040(192500188241 16-Jul-10.00:00:00_CT000138192500191281 03-Mar-1600:00:0(CT00013;192500281858 03-Jun-16 00:00:00 CT00063; 192500281858 2 5-Jul-16 00:00:00 CT00013: 192500378608 26-Jun-13 00:00:00 CT00005: 192500472171 06-Jul-12 00:00:00 192500685847 19-Jul-16 00:00:00 CT00077 192500686438 16-Oct-17 00:00:00 192500827283 0 5-Jun-13 00:00:00 CT00077 192500880161 17-May-10.00-00-00 CT00013(192503046121 09-Apr-1{27-Jan-17CT00042:192503128071 29-Mar-11 00:00:0(CT00014(192503146562 10-Mar-10.00:00:00 192600007517 12-Jun-1720-Feb-1; CT00040; 192600613717 26-Jun-17 00:00:00 CT00013; 192600807151 06-Jan-1£19-May-1CT00077;192700077364 04-Feb-1:08-Aug-1:CT00020;192700277381 24-May-1 25-Oct-1; CT00001(192700379165 22-Mar-114-Feb-1 CT00081 192700861097 29-Jul-10 00:00:00 192708789609 29-Dec-10 00:00:00 192800795180 03-Nov-1 28-Jul-17 CT00015; 192816824765 05-Nov-1:05-Aug-1:CT00016:192816846328 26-May-1 29-Oct-14 CT000407 192820824195 19-Aug-14 00:00:00 192900756680 13-Dec-11 00:00:00 CT00060(192900888238 23-Mar-16 00:00:0(CT00013; 192900888238 15-Feb-1 27-Jul-16 CT00001(193000240773 25-Oct-1208-lup-12CT00001(193000244886 13-Feb-1 18-May1CT00000 193000393303 27-Jul-15 10-Feb-1! 193000456103 30-Apr-14 00:00:00 CT00002(193000479142 18-Apr-1, 16-Dec-1, CT00003(193000683750 10-Aug-1: 15-Dec-1: CT00003(193000684437 12-Dec-1, 30-Dec-1, CT00003(193000685863 12-Dec-1, 30-Dec-1, CT00003(193000686506 22-Sep-1:18-May-1CT00020;193000687809 03-Feb-1(22-Jul-09 CT00000: 193000688144 12-Jan-1730-Aug-1(CT00046(193000688144 25-Oct-1, 29-Dec-1 CT00098(181300280040 03-Feb-1!28-May-1CT00003(193000792378 10-Oct-1300:00:00CT00013;193000981477 20-Jan-16 00:00:00 CT00014(193000986415 17-Apr-1, 17-Jun-11CT00001(193100153693 06-Dec-1 25-Oct-1(CT00077 193100409694 20-Sep-1:23-Jan-12CT00098(181300280040 23-Dec-1-19-May-1CT00003(193100609357 11-Feb-1+15-Oct-1: CT00129(193100625721 14-Nov-1 22-Jun-1€ CT00178, 193202861895 21-Sep-11 00:00:00 CT00077, 193203030388 31-Dec-1: 13-Mar-1 CT00064{ 193203107309 29-Nov-1 26-Apr-1: CT00085(193203210317 18-Apr-1(08-Dec-1'CT00041; 193204639612 16-Aug-1 27-Apr-1/ CT00003(181300280040 6678

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BRIARWOOD DRIVE	OXFORD NC 27565
BRIARWOOD DRIVE	OXFORD NC 27565
JACEYS LANE	OXFORD NC 27565
JACEYS LANE	OXFORD NC 27565
CHEWNING RD	OXFORD NC 27565
JACEYS LANE	OXFORD NC 27565
DOZER LANE	OXFORD NC
GOOSE RUN	OXFORD NC 27565
BRAME DR	OXFORD NC 27565
THORNTON GRISSOM	OXFORD NC 27565
MATT CURRIN ROAD	OXFORD NC 27565
MATT CURRIN RD	OXFORD NC 27565
WINDING OAK RD	OXFORD NC 27565
CHEWNING RD	OXFORD NC 27565
CLEARWATER DR	OXFORD NC 27565
WINDING OAK ROAD	OXFORD NC 27565
PEBBLE LANE	OXFORD NC 27565
BRIARWOOD DR	OXFORD NC 27565
MATT CURRIN RD	OXFORD NC 27565
POPLAR CREEK RD	OXFORD NC 27565
SAM YOUNG ROAD	OXFORD NC 27565
HIGHWAY 15	OXFORD NC 27565
HIGHWAY 15	OXFORD NC 27565
REAVIS RD	OXFORD NC 27565
OAKSTREET	STOVALL NC 27582
HIGHWAY 15	OXFORD NC 27565
MAIN STREET	STOVALL, NC27582
WILSON TOWN ROAD	STOVALL NC 27582
MAINSTREET	STOVALL NC
TOM MATTHEWS ROAD	
PLANTATION ROAD	BULLOCK NC
PLANTATION ROAD	BULLOCK NC
	OXFORD NC 27565
PATRICK LANE	OXFORD NC 27565
	OXFORD NC 27565
TYLER-HAILEY WAY	OXFORD NC 27565
BRANDON SPRINGS	OXFORD NC 27565
GRESHAM DRIVE GRESHAM DRIVE	OXFORD NC 27565
	OXFORD NC 27565
GRESHAM DRIVE GRESHAM DRIVE	OXFORD, NC 27565
N GREG ALLEN WAY	OXFORD, NC 27565 OXFORD NC 27565
FAIRPORT RD	KITTRELL NC 27544
FAIRPORT ROAD	KITTRELL NC 27544
WILLARD DRIVE	CREEDMOOR NC
GRESHAM DRIVE	OXFORD NC 27565
HIGHT RD	
HIGHT RD	OXFORD NC 27565 KITTRELL NC 27544
ED HARRIS RD	OXFORD, NC 27565
CLEAR SPRINGS RD	
	OXFORD NC 27565
WILLARD DRIVE GRESHAM DRIVE	CREEDMOOR NC OXFORD NC 27565
HIGHT ROAD	
TABBS CREEK LANE	OXFORD NC 27565
	OXFORD NC 27565
	OXFORD NC 27565
CABIN DRIVE ANTIOCH ROAD	OXFORD NC 27565
ROCK BROOK RD	OXFORD NC 27565
WILLARD DRIVE	OXFORD NC 27565 CREEDMOOR NC
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COUNTY OF VANCE, NORTH CAROLINA 122 YOUNG STREET, SUITE B HENDERSON, NORTH CAROLINA 27536

JORDAN MCMILLEN COUNTY MANAGER (252) 738 · 2002 KELLY H. GRISSOM CLERK TO BOARD (252) 738 - 2003

February 20, 2019

John Huisman DWR – Water Planning Section 1611 Mail Service Center Raleigh, NC 27699-1611

Re: Vance County Opposition to being included in Tar-Pamlico Rules Readoption

Dear Mr. Huisman:

Please accept this letter and the enclosed resolution adopted unanimously by the Vance County Board of Commissioners expressing the county's opposition to being added to the counties subject to the rewritten Tar-Pamlico stormwater regulations.

As a tier 1, rural, economically challenged county, we feel inclusion into the stringent storm water rules will have a significant impact on our development, will create a substantial unfunded mandate on the county, and will create cost barriers for development in our county. A review of the fiscal analysis prepared by the Office of State Budget and Management indicates that local governments with an annual growth rate of approximately 200 people within the Tar-Pamlico Basin (between 2000 and 2010) were considered for addition to the stormwater regulations. Vance County's growth rate in the basin during this period was less than 200 with a value of 186, and if the analysis looked at the growth rate beyond 2010, it would indicate a negative growth rate as overall population in the county has declined since 2010. In addition to this, the NCOSBM report indicates we have stormwater staff or other staff for this purpose, which is incorrect. Unlike the other two counties being added to the stormwater regulations (Granville and Wilson counties), this will be new territory for Vance County as we have no other basins in which we are subject to stormwater rules. This will cause increased cost and will require the assistance of an outside consultant/engineer and perhaps another position dedicated to this purpose. For a county with limited development and struggles overcoming the past recession, we are not seeing the development and growth of either Granville or Wilson Counties, and should be compared more to Warren County which is also within the Tar-Pamlico basin and not subject to the rule change. From just recently putting countywide zoning in place, taking a leap forward into the realm of stormwater regulations will have a lasting impact for economic development and growth in general in rural Vance County.

We ask for consideration of this information and the attached resolution as this rule change is considered.

Sincerely,

Aprila Mi Mille

Jordan McMillen County Manager

c: Vance County Board of Commissioners Representative Terry Garrison Senator Erica D. Smith Sam Hobgood, Planning and Development Director Jonathan Care, County Attorney Diane Cox, Kerr-Tar COG Executive Director

RESOLUTION by the

Vance County Board of Commissioners In Opposition to Adding Tar Pamlico Stormwater Requirements to Vance County

- WHEREAS, the Environmental Management Commission is proposing to add Tar-Pamlico Stormwater Requirements for Vance County, Granville County, and Wilson County, to restore nutrient-impaired waters that remains unmet in the Tar-Pamlico Estuary; and,
- WHEREAS, if adopted, this would require local governments to develop and implement stormwater permitting programs requiring developers to implement stormwater controls to meet nutrient loading rate targets on new development projects, and submit annual reports to the state DEQ (Division of Environmental Quality) documenting their progress; and,
- WHEREAS, the proposed stormwater requirements would be applied to new development projects disturbing one acre or more for single family and duplex property; one-half acre or more disturbance for commercial, industrial, institutional, multifamily residential or local government property; and on existing developed lots where the built-upon area exceeds 24% of disturbance; and,
- WHEREAS, if adopted, the proposed stormwater program will incur additional and increased costs for developers and create significant barriers to development in Vance County as a rural, tier 1 county with limited development; and,
- WHEREAS, the current Tar-Pamlico amendment assumes each local government has stormwater staff or other staff, to draft and amend ordinances and take them through approval processes; and,
- WHEREAS, Vance County does not have stormwater staff to carry out these responsibilities, which will result in an impact on the budget for the development, implementation, record keeping, annual reporting, inspection, and enforcement of the stormwater program while creating additional workload on the county's limited planning staff and causing a significant overall cost impact on the county.
- NOW, THEREFORE BE IT RESOLVED, by the Vance County Board of Commissioners as follows:
 - 1. Vance County is a rural, tier 1 economically challenged county in a similar position as Warren County, our neighboring county to the east which is within the Tar-Pamlico basin and not subject to being added to the stormwater requirements.

- 2. The vast majority of Vance County is open farmland and low-density residential land with the greatest portion of growth and development occurring within the City of Henderson which is already covered and compliant with the stormwater requirements.
- **3.** The addition of Vance County to the Tar-Pamlico stormwater requirements will cause a significant burden on the limited amount of existing development within the county by adding design, permitting, and construction costs to citizens and property owners who have access to no engineering firms in the county within this area of expertise.
- 4. The addition of Vance County to the Tar-Pamlico stormwater requirements will create an undue financial burden and an unfunded mandate on the county which has no existing stormwater staff or individuals with expertise in this area and will require significant assistance from outside firms to develop and implement stormwater regulations.
- 5. The addition of Vance County to the Tar-Pamlico stormwater requirements will become a deterrent for economic development in the county, is firmly opposed, and the Board of Commissioners requests further consideration of this matter by the state department of environmental quality and the environmental management commission.

Adopted this, the 4th day of February, 2019.

Archie B. Taylor, Jr., Charman Vance County Board of Commissioners

Attest:

Kelly H. Grissom Clerk to the Board



April 15, 2019

<u>Via e-mail</u> Mr. John Huisman DWR - Water Planning Section 1611 Mail Service Center Raleigh, NC 27699-1611 <u>nps-comments@ncdenr.gov</u>

RE: Comments on Draft Changes to 15A NCAC 02B .0235, Neuse River Basin Nutrient Sensitive Waters Management Strategy: Basinwide Stormwater Requirements

Dear Mr. Huisman:

The City of Durham Department of Public Works ("the Department") reviews residential, commercial, industrial, and institutional development plans for compliance with stormwater and riparian buffer protection requirements. As such, the Department has a strong interest in the regulatory review of the Neuse River Basin Nutrient Strategy pursuant to Title 15A of the North Carolina Administrative Code (NCAC) Section 02B .0235.

Please see the attached Microsoft Word document with our comments and text changes provided using the MS Word Track Changes format.

Thank you for the opportunity to comment on these proposed changes. If you have any questions, please contact Jennifer Buzun at (919) 560-4326, ext. 30292, jennifer.buzun@durhamnc.gov.

Respectfully,

Marvin G. Williams Director – Department of Public Works

Attachment:

Rules_02B_Neuse Tar-Pamlico Nutrient Strategy Draft for Comment City of Durham comments.doc

NEUSE RIVER BASIN- NUTRIENT SENSITIVE WATERS MANAGEMENT 15A NCAC 02B .0235.0711 STRATEGY: BASINWIDE STORMWATER REQUIREMENTS

The following is the urban stormwater management strategy for the Neuse River Basin:

- (1)PURPOSE. The purpose of this Rule is to achieve and maintain the nitrogen loading reduction goal established for the Neuse River Estuary in Rule .0710 of this Section from an undeveloped condition on lands in the Neuse River Basin on which new development occurs. Nothing in this Rule preempts the requirements of 15A NCAC 02B .0277 for projects subject to the Falls Reservoir Nutrient Strategy or prevents local governments from implementing requirements that are more restrictive than those set forth in this Rule.
- (1)(2)APPLICABILITY. The following local governments are designated, based on population and other factors, as parties responsible for implementing stormwater management requirements as part of the Neuse River Nutrient Sensitive Waters stormwater management strategy: shall implement the stormwater management requirements of this Rule. Municipalities shall implement this Rule throughout their corporate limits and extraterritorial jurisdictions within the basin, while counties shall implement throughout their territorial jurisdictions within the basin. Counties named in this Item may implement this Rule within municipalities not named in this Item in accordance with G.S. 160A-360(d).
 - effective August 1998:

	<u>(a)</u>	Local governments designated under the original version of this Rule effective August 1998:
		(a)(i) Cary,
		(b)(ii) Durham,
		(c)(iii) Garner,
		(d)(iv) Goldsboro,
		(e)(v) Havelock,
		(f)(vi) Kinston,
		(g)(vii) New Bern,
		(h)(viii) Raleigh,
		(i)(ix) Smithfield,
		$\frac{(j)(x)}{(j)}$ Wilson,
		(k)(xi) Durham County,
		(1)(xii) Johnston County,
		(m)(xiii) Orange County,
		(n)(xiv) Wake County, and
		$(\Theta)(xv)$ Wayne County.
	<u>(b)</u>	The following additional local governments are subject to this Rule:
		(i) Apex,
		(ii) Clayton,
		(iii) Fuquay Varina,
		(iv) Greenville,
		(v) Holly Springs,
		(vi) Knightdale,
		(vii) Morrisville,
		(viii) Rolesville,
		(viii) Wake Forest,
		(ix) Wendell,
		(x) Winterville,
		(xi) Craven County,
		(xii) Greene County,
		(xiii) Nash County,
		(xiv) Pitt County, and
		(xv) Wilson County.
(2)		corporated areas and other counties, not listed under Item (1) of this Rule, may seek to implement their own
	local sto	prmwater management plan by complying with the requirements specified in Items (5) and (6) of this Rule.
<u>(3)</u>	EXEMF	TION. A stormwater management plan is not required for new development on an individual single-family
	lot if the	e new development meets the following criteria:
	<u>(a)</u>	It is not part of a larger common plan of development or sale; and
	<u>(b)</u>	The project does not result in greater than five percent built upon area on the lot or it is for purposes of a
		single-family residence on a lot five acres in size or greater that has no other existing homes or

- buildings.[A1]
- (3)The Environmental Management Commission may designate additional local governments by amending this Rule based on their potential to contribute significant nutrient loads to the Neuse River. At a minimum, the Commission shall review the need for additional designations to the stormwater management program as part of the basinwide planning process for the Neuse River Basin. Any local governments that are designated at a later date under the Neuse Nutrient Sensitive Waters Stormwater Program shall meet the requirements under Items (5) and (6) of this Rule.

- (4) LOCAL PROGRAM IMPLEMENTATION REQUIREMENTS. All local governments subject to this rule shall implement stormwater management programs approved by the Commission in March 2001 pursuant to the timeframes set out in Item (6) of this Rule, or any subsequent modifications to those plans approved by the Director, according to the following requirements and the standards contained in Item (5) of this Rule: Local stormwater programs shall address nitrogen reductions for both existing and new development and include the following elements:
 - (a) Review and approval of stormwater management plans for new developments to ensure that: <u>The</u> requirement for local government approval of a stormwater plan for all proposed new development projects disturbing one acre or more for single family and duplex residential property and recreational facilities, and one-half acre or more for commercial, industrial, institutional, multifamily residential, or local government property. Where proposed new development on an existing developed lot not part of a larger common plan of development results in built-upon area exceeding 24 percent, a stormwater plan addressing the new project area shall be required.
 - (b) <u>A plan to ensure maintenance of stormwater control measures (SCMs) implemented to comply with this</u> Rule for the life of the development;
 - (c) A plan to ensure enforcement and compliance with the provisions in Item (5) of this Rule for the life of the development:
 - (d) <u>A public education program to inform citizens how to reduce nutrient pollution and to inform developers</u> about the nutrient requirements set forth in Item (5) of this Rule;
 - (e) <u>A mapping program that includes major components of the municipal separate storm sewer system, waters</u> of the State, land use types, and location of sanitary sewers; and
 - (f) <u>A program to identify and remove illegal discharges.</u>

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- (5) DEVELOPMENT PROJECT REQUIREMENTS. A proposed development project shall be approved by a subject local government for the purpose of this Rule when the applicable requirements of Item (4) of this Rule and the following criteria are met. For development projects subject to the requirements of 15A NCAC 02B .0277 the requirements of this Item shall not apply.
 - The project area, as defined in 15A NCAC 02H .1002, shall meet either a nitrogen loading rate target of 3.6 (i)(a) pounds/acre/year or the definition of runoff volume match found in 15A NCAC 02H .1002. Except as otherwise stated in this Item, the project may meet the loading rate target through use of permanent nutrient offset credit pursuant to Rule .0703 of this Section. Persons who seek nutrient offset credit to these requirements shall provide proof of nutrient offset credit acquisition to the permitting authority prior to approval of the development plan; the nitrogen load contributed by new development activities is held at 70 percent of the average nitrogen load contributed by the 1995 land uses of the non-urban areas of the Neuse River Basin. The local governments shall use a nitrogen export standard of 3.6 pounds/acre/year, determined by the Environmental Management Commission as 70 percent of the average collective nitrogen load for the 1995 non urban land uses in the basin above New Bern. The EMC may periodically update the design standard based on the availability of new scientific information; Developers shall have the option of offsetting part of their nitrogen load by funding offsite management measures by making payment to the NC Ecosystem Enhancement Program or to another seller of offset credits approved by the Division or may implement other offset measures contingent upon approval by the Division. Offset payments shall meet the requirements of Rule .0240 of this Section, which establishes procedural requirements for nutrient offset payments. However, before using offset payments, the development must attain, at a minimum, a nitrogen export that does not exceed 6 pounds/acre/year for residential development and 10 pounds/acre/year for commercial or industrial development;
 - (ii) For the following local governments and any additional local governments identified in rule by the Commission, the post construction requirements of 15 NCAC 02B .0277 shall supersede the requirements in this Sub item for areas within their jurisdiction within the watershed of the Falls of the Neuse Reservoir: Durham, Raleigh, Durham County, Orange County, and Wake County; and
 - (b) Untreated nutrient loading rates from the project area shall be determined through the use of the tool most recently approved by the Division to have met the following criteria, or through an alternative method that meets the following criteria at least as well, as determined by the Division:
 - (i) <u>Provides project site-scale estimates of annual precipitation-driven total nitrogen and total phosphorus load;</u>
 - (ii) From all land cover types on a project site at build-out;
 - (iii) Based on land-cover-specific nitrogen and phosphorus loading coefficients and annual runoff volume; and
 - (iv) Is supported by the weight of evidence from available, current, and applicable research.

(c) <u>Nutrient loading rate reductions resulting from the use of SCMs shall be determined through the use of the tool most recently approved by the Division to have met the following criteria, or an alternative method that meets the following criteria at least as well, as determined by the Division:</u>

- (i) <u>Provides project site loading reduction estimates from the installation of DEMLR-approved</u> <u>SCMs</u>;
- (ii) <u>Reductions apply to the portion of the project area's runoff volume that is directed to the SCMs;</u>

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		(iii) The method partitions the runoff volume processed by the SCM among hydrologic fates and
		assigns nutrient concentrations to each of those fates; and
		(iv) The method is supported by the weight of evidence from available, current, and applicable
		research.
	<u>(d)</u>	Projects shall meet the requirements set forth in 15A NCAC 02H .1003. Projects that use SCMs to treat
		stormwater shall use the required storm depths and meet the SCM and density requirements set forth in the
		stormwater programs to which they are subject pursuant to 15A NCAC 02H .1017, .1019, and .1021.
		Projects not subject to any of these Rules shall be considered high-density if they contain twenty four
		percent or greater built-upon area or have greater than two dwelling units per acre, and shall use a storm
		depth of one inch for SCM design.
	<u>(e)</u>	Proposed new development undertaken by a local government solely as a public road expansion or public
		sidewalk project or proposed new development subject to the jurisdiction of the Surface Transportation
		Board shall be exempt from the requirements of Sub-Item (5)(d) of this Rule and may meet the loading rate
		targets through use of permanent nutrient offset credit pursuant to Rule .0703 of this Section:
	<u>(f)</u>	Proposed development projects that would replace or expand existing structures and would result in a net
		increase in built-upon area shall be responsible for nitrogen loading from the area of disturbance less any
		preexisting[A2] built-upon area located therein. The developer shall have the option to either achieve the
		percent loading reduction goal established in Rule .0710 of this Section or meet the loading rate target of
		this Item;
	<u>(g)</u>	Proposed new development projects may utilize an offsite SCM that is dedicated to treating an area
		encompassing the project provided the SCM complies with the applicable requirements of this Item for the
	<i>(</i> 1)	area that it treats:
	<u>(h)</u>	Where pursuant to G.S. 153A-454 and G.S. 160A-459 a local government program does not review a
		development project proposed by a state or federal entity for the requirements of this Rule, the entity shall
		obtain Department review and approval; and Proposed development projects shall demonstrate compliance with the riparian buffer protection
	<u>(i)</u>	requirements of Rule .0714 of this Section.
		(iii) there is no net increase in peak flow leaving the site from the predevelopment conditions for the 1
		year, 24 hour storm. [A3]
	(b)	Review of new development plans for compliance with requirements for protecting and maintaining
	(0)	existing riparian areas as specified in 15A NCAC 02B .0233;
	(c)	Implementation of public education programs;
	(d)	Identification and removal of illegal discharges;
	(e)	Identification of suitable locations for potential stormwater retrofits (such as riparian areas) that could be
		funded by various sources; and
	(f)	Submittal of an annual report on October 30 to the Division documenting progress on and net changes to
		nitrogen load from the local government's planning jurisdiction.
(5)		governments shall implement stormwater management programs according to their plans approved by the
		nission as of March 2001. Local governments administering a stormwater management program shall submit
	annual	reports to the Division documenting their progress and net changes to nitrogen load by October 30 of each
	year.	
(6)		cal government fails to properly implement an approved plan, then stormwater management requirements for
		g and new urban areas within its jurisdiction shall be administered through the NPDES municipal stormwater
	-	ting program per 15A NCAC 02H .0126:
	(a)	Subject local governments shall develop and implement comprehensive stormwater management programs,
	(b)	tailored toward nitrogen reduction, for both existing and new development.
	(b)	These stormwater management programs shall provide all components that are required of local government stormwater programs in Sub items (4)(a) through (f) of this Rule.
	(c)	Local governments that are subject to an NPDES permit shall be covered by the permit for at least one
		permitting cycle (five years) before they are eligible to submit a local stormwater management program for
		consideration and approval by the EMC.
<u>(6)</u>	RULE	IMPLEMENTATION
<u></u>	(a)	Within four months of the effective date of this Rule, the Division shall submit a model local stormwater
		program embodying the elements in Items (4) and (5) of this Rule to the Commission for approval. The
		Division shall work in cooperation with subject local governments in developing this model program.
	<u>(b)</u>	Local governments designated under the original version of this Rule effective August 1998 and additional
		local governments designated herein shall submit a local stormwater program for approval by the
		Commission within six months and 12 months, respectively, of the Commission's approval of the model
		local program. These local programs shall meet or exceed the requirements in Items (4) and (5) of this
		<u>Rule.</u>
	<u>(c)</u>	The Division shall provide recommendations to the Commission regarding proposed local programs. The
		Commission shall approve programs or require changes based on the standards set out in Items (4) and (5)
		of this Rule. Should the Commission require changes, the applicable local government shall have three

1		D-131 months to submit revisions, and the Division shall provide follow-up recommendations to the Commission
2		within two months after receiving revisions;
3		(d) Within six months after the Commission's approval of a local program, the affected local government shall
4		<u>complete adoption of and implement its local stormwater program.</u>
5		(e) <u>Local governments administering a stormwater program shall submit annual reports in electronic format to</u>
6		the Division documenting their progress regarding each implementation requirement in Item (4) of this
7		Rule and net changes to nitrogen load by October 30 th of each year. Annual reports shall also include as
8		appendices all data utilized by nutrient calculation tools for each development stormwater plan approved in
9		accordance with this Rule.
10		(f) Any significant modifications to a local program subsequent to its approval pursuant to the requirements of
11		this item shall be submitted to the Director for approval.
12	(7)	<u>COMPLIANCE</u> . A local government's authority to approve new development stormwater plans for compliance with
13	<u></u>	this Rule pursuant to Item (5) of this Rule shall be contingent upon maintaining its own compliance with this Rule.
14		A local government that fails to submit an acceptable local stormwater program within the timeframe established in
15		this Rule, fails to implement an approved program, or fails to comply with annual reporting requirements shall be in
16		violation of this Rule.
17		
18	History Note:	Authority G.S. 143-214.1; 143-214.7; 143-214.26; 143-215.1; 143-215.3(a)(1); S.L. 1995, c. 572; S.L. 1997-458;
19	2	S.L. 2006-246;
20		Eff. August 1, 1998;
21		Amended Eff. January 15, 2011 (this permanent rule replaces the temporary rule approved by the RRC on
22		December 16, 2010).
23		<u>Readopted Eff. [New Date].</u>
24		

From: Brown, Ben <Ben.Brown@raleighnc.gov>
Sent: Tuesday, April 16, 2019 3:06 PM
To: SVC_NPS-comments <NPS-comments@ncdenr.gov>
Cc: wayne.miles@raleighnc.gov; McLawhorn, Dan <Dan.McLawhorn@raleighnc.gov>
Subject: [External] Comments for Neuse NSW Rules Re-adoption

John,

Here are the comments from the City's Stormwater Staff regarding the Neuse Rules re-adoption. Feel free to reach out to me for any clarification if it is needed.

For Section .0711 (5)

(c) – The regulation is not as clear as past iterations regarding requiring every project over 24% impervious would require a primary SCM before an offsite mitigation buydown payment can be utilized.
(b) –This section is stating that projects must submit loading calculations for phosphorous removal even though the Neuse NSW rules only require treatment for nitrogen.

(d) – Per my reading of this section, even exempted projects are now subject to 24% impervious coverage. I think clarity is needed to know whether all projects above 24% are now subject regardless of exemption status. Specifically, are projects under the one acre disturbance threshold now subject to the NSW rules in the State's view?

(e) - Why are local linear projects not treated the same as NCDOT linear projects, we would prefer to have using NCDOT's BMP toolbox as a compliance option. Also, it appears this would allow future city streets built by private developers to utilize this as well. It may be worth clarifying whether privately built streets that will be taken over by a local government for maintenance are able to comply with the rules through just an offsite mitigation buydown.

(f) – This section is unclear on how sites with existing impervious can be permitted. Can this section be clarified, City Staff believes the language will lead to inconsistent interpretation without clarification. The city has been utilizing a state approved method for dealing with sites with existing impervious being developed, this method is the "Apportioning Method". We are happy to provide the state with some examples of this method if that is needed.

thanks

Benjamin A. Brown, PE, CFM

Stormwater Administrator

City of Raleigh Engineering Services Department Stormwater Management One Exchange Plaza, Ste. 706 | Raleigh, NC 27601 (p) 919-996-3515 | (c) 984-202-3822 ben.brown@raleighnc.gov twitter.com/sustainableral raleighnc.gov

Please note that email sent to/from this address is subject to public records laws and may be disclosed to third parties.

From: Noah Parsons <nparsons@wilsonnc.org>
Sent: Thursday, April 11, 2019 4:44 PM
To: Hawhee, Jim <jim.hawhee@ncdenr.gov>; Huisman, John <john.huisman@ncdenr.gov>
Subject: [External] proposed rule updates

So proposed is to do away with the 6/10 pound rule for nitrogen loading and replace it with the 24% BUA rule, where if site is over 3.6lb/ac but under 24% BUA then they can buy down the nitrogen. If over the 24% and over 3.6 lb/ac then a primary SCM would be required. Under the old 6/10 rule if over the 6/10 then an scm was required and sized so that it would treat enough nitrogen to bring it back under the threshold and the rest could be bought down. Under this new proposed rule, how would the pond be sized? Big enough to treat down to whatever the loading would be for 24% of the site, and then buy down the rest to 3.6?

Also, when looking at the peak flow portion of a site it is proposed to do away with the site not exceeding the predevelopment runoff of a 1yr/24hr storm. There are currently two exemptions to peak flow which are: less than 10% increase from pre-post development or less than 15% BUA. If either of these apply then the site is exempt from peak flow. Is the BUA changing to 24% or staying at 15% under the new rule?

Noah Parsons

Stormwater Compliance Specialist Engineering Department City of Wilson Phone: 252-296-3305



TO:	Rich Gannon, Supervisor, Nonpoint Source Planning Branch
FROM:	Tim Baumgartner, Director, Division of Mitigation Services
SUBJECT:	Re-adoption and Revisions to 15A NCAC 02B rules
DATE:	3/21/2019

The Division of Mitigation Services (DMS) appreciates the opportunity to comment on the proposed readoption of the 15A NCAC 02B rules.

DMS supports revisions to the rules. The revisions, as proposed, to 15A NCAC 02B .0701, .0733 provide progress, but do not optimally define and/or clarify key terms and concepts. We believe the rules can be greatly improved by adding a few minor changes and it is our recommendation that they be included as part of the final adopted rule.

The rules will generally increase costs of nutrient mitigation projects, particularly stewardship costs, and those costs will, in turn, be transferred to future development costs. As a partner agency, DMS is willing to assist DWR in ensuring these rule amendments serve both the needs of consumers and North Carolina's natural resources.

DMS staff have reviewed the 5/11/2018 version of the rules and offer the following comments for your consideration. The rule paragraphs, subparagraphs and parts (in parentheses) are included as reference:

15A NCAC 02B .0701

To improve rule clarity (without substantively affecting the rules) and to better reflect common and legal usage of terms, DMS recommends that DWR adjust rule language as follows:

(28) "Non-wasting endowment" – historically, the definition of stewardship did not require the perpetual repair and renovation of a nutrient reduction project. The rule specifies that naturally sustaining systems do not require perpetual repair and renovation, but that is missing from this definition and should be included. Repair and renovation are specific to non-sustaining systems such as stormwater BMPs.



(31) "Nutrient Offset Bank" is a <u>site at which a</u> nutrient reduction project that is implemented by a provider except DMS and approved by the Division for the purpose of generating nutrient offset credit. through execution of a nutrient offset banking instrument.

(33) "Nutrient Offset Project" is a nutrient reduction project that is implemented by DMS and approved by the Division for the purpose of generating nutrient offset credit. for the purpose of generating nutrient offset credit.

(34) "Nutrient reduction practice" – this definition should more clearly state that it includes all nutrient offset projects and any "type of programmatic effort..."

(35) "Nutrient reduction project" – this definition is unnecessary and can be deleted. All nutrient offset projects are site-specific.

(39) "Provider" means any public or private person or entity that implements a nutrient reduction project and seeks nutrient offset credit for sale, lease, or conveyance in exchange for remuneration, including <u>in-lieu fee programs DMS</u>. Persons or entities other than DMS <u>All</u> providers other than in-lieu fee programs that seek to become a provider of nutrient offset credits become so upon approval of a <u>must have an approved</u> nutrient offset banking instrument by the Division.

15A NCAC 02B .0703

(b)(5) GEOGRAPHIC RESTRICTIONS

The proposed rule added a new restriction under section (b)(5). As currently written, section (b)(5) is unclear.

- The term "Estuarine nutrient strategy" is not defined in the rules.
- The term "assessment unit" is not defined in the rules.
- As currently written, the rule appears to create new mitigation service areas in Neuse 03020204 and the Tar-Pamlico 03020104 and 03020105 cataloging units. DMS would not support creating new and separate service areas in these regions.
- Based on staff conversations with DWR staff, DWR conveyed the intent of the language was to address mitigation projects located in estuarine waters rather than land-based projects. DWR stated that their intent was to focus estuarine projects in areas where they would be most effective and to avoid areas where their benefits would be minimal. DMS supports this concept but the (b)(5) rules currently do not state this. DMS recommends the entire paragraph (b)(5) be rewritten to convey this concept.

(d)(6) QUANTIFYING NUTRIENT OFFSET CREDITS

• (d)(6) –DMS recommends the language be modified to state that the term and permanent credits be tracked "separately" as opposed to "separate ledgers" since it may be necessary to show conversion transactions and all site credits on a single form.

(e)(1 & 3) PROJECT APPROVAL STANDARDS

- (e)(1) NUTRIENT OFFSET BANKING INSTRUMENT Modify language as follows: "Providers except DMS seeking approval of a nutrient offset bank..." DMS reference is unnecessary as edits to .0701 (33) will adequately define who seeks approval for nutrient offset banks.
- (e)(3) FINANICAL ASSURANCES "Providers <u>with mitigation instruments except DMS</u> shall provide the financial assurance..." There are supplemental requirements specific to in-lieu fee requirements in another section and DMS is not a provider with a mitigation bank instrument.

(f) RELEASE AND ACCOUNTING FOR NUTRIENT OFFSET CREDITS

Since only providers with mitigation bank instruments have buffer and nutrient credit releases:

- (f)(1) replace "providers" with "providers with mitigation banking instruments"
- (f)(2) delete reference to DMS and replace "providers" with "providers with mitigation banking instruments."
- "The Division shall release nutrient offset credits from an approved project nutrient offset bank in the following manner."
- In-lieu fee programs (ILF) have a separate section in the rule with additional requirements.

(g) MAINTAINING PERMANENT NUTRIENT OFFSET CREDITS

- (1) An endowment historically has been purposed for long-term monitoring and to ensure that the appropriate conservation easements are protected and enforced. The language here implies that the primary purpose of the endowment is to create future funds to perform maintenance activities. This type of endowment should be <u>limited</u> to project types that require perpetual maintenance. Nearly every nutrient reduction project implemented to date has been to riparian buffer systems that <u>do not require</u> maintenance. DMS recommends that this section be split into two parts with each having language directly focused on the long-term requirements of each type separately. By having them mixed together, the rule is confusing as to what is required for each type. DMS recognizes that subparagraph (5) in this section partly addresses these issues, but the rule language is misleading by implying that the maintenance standards are universal when they are not.
- (g) (1) Clarify that the endowment amount paid to the steward is based on the duties accepted by the steward and not the landowner, who may ultimately be responsible. (g)(1) "The provider shall create and transfer to the perpetual steward a non-wasting endowment or other dedicated financial surety to provide for the oversight of the project's load reductions. The endowment amount shall be proportionate to the duties accepted by the steward."
- (4) DMS recommends that DWR speak with the DEQ Stewardship program regarding the significant increase in liability the rules will force upon the Department's stewardship program. The Department's stewardship program is not a maintenance and restoration operation. As currently written, there may be a significant increase in the costs of endowments to ensure that maintenance and possible project replacement costs are covered. Also, the significant risk this language imposes upon a potential steward will greatly limit stewards that will accept such obligations. This will in-turn negatively impact a provider's ability to protect the mitigation assets. If stewardship entities refuse to take on such liability, it is likely that providers may also be unwilling to take on these liabilities.
- (4) Impacts to an approved nutrient offset project should result in the impactor paying fees sufficient to cover the costs of replacing lost functions. These actions are either a permitted activity which would require mitigation or a regulatory action against an impactor.

(h) RENEWING TERM NUTRIENT OFFSET CREDITS - DMS recommends replacing "proof" with "documentation."

(i) ADDITIONAL PROVISIONS REGARDING THE DIVISION OF MITIGATION SERVICES - The section should be relabeled as "PROVISIONS REGARDING NUTRIENT OFFSET IN-LIEU FEE PROGRAMS." The rules are directed to the operation of in-lieu fee programs. Although DMS currently operates the only nutrient offset in-lieu fee program, there are no assurances there will not be additional ones in the future nor that DMS will remain as the agency tasked with operation of the existing state program.

- Throughout this section and the rules, "DMS" should be replaced by "nutrient offset in-lieu fee programs."
- (i)(2). Remove clause "the requirement due date," as it is synonymous with the preceding clause.



ROY COOPER Governor

MICHAEL S. REGAN Secretary

ivision
rules

The Financial Services Division (FSD) Stewardship Program appreciates the opportunity to comment on the proposed re-adoption of the 15A NCAC 02B rules. The FSD Stewardship Program supports revisions to **15A NCAC 02B** rules however the revisions, as proposed, require clarification of key terms, concepts, and requirements. As a partner program, the FSD Stewardship Program has reviewed the version of the rules currently posted on the Environmental Management Commission website and offers the following comments for your consideration.

For reference the proposed rule language is provide in blue font, the item pertaining to the comment(s) is highlighted in yellow, and Stewardship Program comment(s) immediately follow the relevant paragraph, subparagraph, or part.

15A NCAC 02B .0703 NUTRIENT OFFSET CREDIT TRADING

(g) MAINTAINING PERMANENT NUTRIENT OFFSET CREDITS. A provider shall transfer responsibility for oversight of a completed permanent project to a perpetual steward in accordance with this Paragraph and the approved project plan. A perpetual steward may also transfer responsibility to another perpetual steward in accordance with the terms of this Paragraph, subject to DWR approval. The provider shall ensure that the following mechanisms are in place to ensure that load reductions are sustained in perpetuity:

Comment: As proposed the rule does not define "oversight" or "perpetual steward". It is commonly understood that a perpetual steward (a.k.a. conservation easement holder) is responsible for the oversight and enforcement of conservation easement terms and conditions.



(1) The provider shall create and transfer to the perpetual steward a non-wasting endowment or other dedicated financial surety to provide for the oversight of the project's load reductions.

Comment: Replace "project's load reductions" with "project conservation easement". The language in the rule switches from *oversight of a completed permanent project* in the preceding paragraph to *oversight of the projects load reductions* in this subparagraph. This is confusing and conflates the role of the perpetual steward with the role of the project owner. The oversight of a project's load reductions is the responsibility of the project owner and the regulatory agency; these responsibilities are not conveyed in a conservation easement.

(2) For projects utilizing conservation easements, the provider shall acquire and then transfer a conservation easement to a perpetual steward in accordance with 16 U.S.C. 170(h) and the Conservation and Historic Preservation Agreements Act, G.S. 121-34 et seq. The terms of the conservation easement shall be consistent with a Divisionapproved template or be approved by the Division. Non-governmental perpetual stewards shall be accredited by the Land Trust Accreditation Commission or approved in writing by the Division.

Comment: Conservation easements are legal instruments which convey certain property rights to the easement holder and impose restricted activities on the land surrounding a project. Conservation easements do not convey operation or maintenance responsibilities to an easement holder. Operation and/or maintenance responsibilities of a project are the responsibility of the landowner and/or facility operator. The stewardship of a conservation easement involves the inspection of the conservation easement to determine if the landowner is honoring the terms, conditions, and restrictions defined in the conservation easement.

(3) For projects utilizing stormwater control measures (SCMs), SCMs shall be placed in recorded drainage easements with recorded access easements to the nearest public right-of-way for purposes of operation and maintenance. These easements shall be granted in favor of the person or entity responsible for operating and maintaining the structures, with a note as to the responsible person or entity. Structure operation and maintenance shall be the responsibility of the landowner or easement holder unless the Division gives written approval for another person or entity. Easements shall be of sufficient width for inspection and maintenance of the project.

Comment: Delete "or easement holder". In this context the drainage easement holder does not operate or maintain the SCM. The SCM is operated and maintained by a property owner. In fact, the current DWR-approved conservation easement specifically states the easement holder "…shall not be responsible for any costs or liability of any kind related to the ownership, operation, insurance, upkeep, or maintenance of the property…" (DWR conservation easement template Article VI Miscellaneous E. Obligations of Ownership).

It should be noted drainage easements are deed restrictions designed to ensure drainage pathways can be accessed and maintained free of obstructions. These are typically held by a municipality or utility which routinely inspects the drainage easement to determine if the property owner is honoring the terms, conditions, and restrictions defined in the drainage easement.



(4) The Division may temporarily or permanently invalidate permanent credits if it determines that the bank or project has been impacted due to failure to comply with the terms of an associated project plan, nutrient offset banking instrument, easement, maintenance agreement, or other protective agreement.

Comment: This deviates from the current understanding and practice of mitigation credits/assets delivery and management. Upon the closeout of a mitigation project the mitigation credits are fully released, the provider is released from credit maintenance responsibilities, and the easement holder initiates long-term oversight of the conservation easement terms, conditions, and restrictions. The easement holder has no legal obligation to maintain the mitigation credits.

(5) Notwithstanding the other requirements of this Paragraph, a permanent project may be passively restored exclusively through natural ecological processes after project completion if:

 (A) it is damaged by natural causes that could not have been prevented by the exercise of foresight or caution, and
 (B) the practice employed is designed to restore a natural ecological community at the project site.

Comment: Delete items (A) and (B). These qualifiers are inconsistent with current understanding and practice of mitigation credits/assets delivery and management. If a completed project is restored passively then, by definition, the site is being maintained by natural ecological processes. A landowner should not be obligated to "exercise foresight or caution" in preventing site damage caused natural ecological processes.

Section .0700 – NUTRIENT MANAGEMENT STRATEGIES 15A NCAC 02B .0701 NUTRIENT STRATEGIES DEFINITIONS

Comment: No definition is provided for "Perpetual Steward".

Comment: No definition is provided for "Site Stewardship"

"Non-wasting endowment" is a fund that generates enough interest to cover the cost of perpetual monitoring, maintenance, repair and renovation of a nutrient reduction project.

Comment: The proposed definition of a "Non-wasting endowment" does not conform with the current definition of and practice associated with non-wasting endowments for these types of projects. The current use of stewardship endowments is to fund regular monitoring and enforcement of easement terms and conditions. As currently practiced the stewardship of an easement does not include the perpetual maintenance, repair and/or renovation of a conservation easement or the project protected by that easement.



FISCAL NOTE FOR PROPOSED AMENDMENTS TO THE NEUSE & TAR-PAMLICO NUTRIENT STRATEGY RULES dated DECEMBER 12, 2018

Comment: The success of the proposed rule is dependent upon the establishment and effective financial management of a non-wasting endowment for every permanent credit project installed under the proposed rule. The Fiscal Note does not discuss the criteria for establishing an endowment nor does it analyze the factors influencing the calculation of an endowment for any of the potential project types.

Comment: The Fiscal Note references a previously published fiscal note entitled *Fiscal Analysis for Proposed Nutrient Strategy for Falls of Neuse Reservoir dated June 14, 2010.* The costs of planning, design, and construction of select SCMs are presented however no cost data is provided for the operation, maintenance, repair, or renovation of these measures. If a non-wasting endowment is intended to cover the full costs of construction, operation, maintenance and renovation of a measure **for perpetuity** then it stands to reason that the financial impact would be analyzed for this proposed rule. The Fiscal Note does not adequately analyze all financial impacts of the rule, leaving all parties, developer, owner, and perpetual steward, at significant financial and legal risk if an inadequate endowment is established for a permanent offset project.

Comment: The Fiscal Analysis for Proposed Nutrient Strategy for Falls of Neuse Reservoir dated June 14, 2010 specifically states BMPs (SCMs) require maintenance to continue to work effectively, including establishing desired vegetation, removing undesirable species, removing accumulated sediment, repairing control structures, repairing erosion and other activities. BMP types discussed in the Fiscal Note include:

- Stormwater wetland
- Bioretention
- Wet Detention
- Extended Dry Detention
- Grassed Swale
- Filter Strip/Level Spreader
- Infiltration Devices
- Buffer w/ Level Spreader
- Sand Filter

The note goes on to say developers would not be responsible for maintenance, rather maintenance would be the responsibility of the property owner. This is in direct conflict with the proposed rule language where it suggests operation and maintenance of the BMP would be the responsibility of the perpetual steward.

Comment: The word "endowment" appears once in the Fiscal Note, on page 74, where it is suggested the amount of funding necessary for a non-wasting endowment by the provider is somehow reduced because DWR will not require a buffer to be replanted in the event of damage sustained by a natural disaster. The Fiscal Note does not discuss this same scenario in the context of engineered SCMs.

From: Barrett Jenkins <bjenkins@restorationsystems.com>
Sent: Tuesday, March 26, 2019 1:33 PM
To: SVC_NPS-comments <NPS-comments@ncdenr.gov>
Subject: [External] Comments on Draft: 15A NCAC02B .0703(d)(3) regarding selling nutrient offset credits for work concurrently sold as stream mitigation

Re: Stream mitigation used for nutrient offsets credits

Referenced draft rule language:

" The Commission specifically requests comment on rule language options proposed in 15A NCAC 02B .0703(d)(3) regarding the generation of nutrient offset credits and stream, buffer, or wetland mitigation credits in spatially overlapping areas."

"Note: The Commission seeks public comment on the following options regarding the generation of nutrient offset credits stream mitigation credits in spatially overlapping areas:

(3) OPTION 1: Reductions shall not include those already implemented to satisfy other requirements under the same nutrient strategy; other local, state or federal requirements; or those resulting from state or federal compensatory mitigation requirements. Specifically, a nutrient reduction project shall not generate nutrient offset credits and stream, buffer or wetland mitigation credits in spatially overlapping areas.

OPTION 2: Unless specifically excepted in Rule, reductions shall not include those already implemented to satisfy other requirements under the same nutrient strategy; other local, state or federal requirements; or those resulting from state or federal compensatory mitigation requirements. Specifically, a nutrient reduction project shall not generate nutrient offset credits and buffer or wetland mitigation credits in spatially overlapping areas. However, restored forest buffer areas associated with stream mitigation projects may generate both stream and nutrient offset credits in spatially overlapping areas within 50 feet from the top of the stream bank."

Comments:

Restoration Systems supports Option 1.

In general it makes sense to be able to use a restored forest buffer to generate an environmental credit that can be applied as stream mitigation <u>or</u> nutrient offset. The conflict is when the environmental credit for a specific unit of buffer restoration is sold twice. <u>It is currently possible in NC to restore a buffer and do no other restoration work and literally sell that buffer restoration unit twice, once as stream mitigation and once as nutrient offset under two different environmental permitting programs.</u>

This scenario is similar to some of the issues brought up in the recent NCGA PED report titled *Stream Restoration Projects Receive Duplicative State Funding and Inadequate Performance Management* in that the mitigation provider can, through two regulatory programs, 404 stream mitigation regulated primarily by the USACE, and the nutrient offset program regulated by DEQ, charge and get paid for the same work twice. The mitigation provider will be doing one unit of work and two different government entities would be permitting the mitigation provider to get paid for two units of work and take credit for doing two units of work. This happens currently and is a net loss for the environment. The fact that it is allowed is not an excuse to allow it to continue when you are aware of the implications. Another NCGA PED related report is from December 2009 titled: *Department of Environment and Natural Resources Wetland Mitigation Credit Determinations and the precedent for excluding double crediting on wetlands*. I believe that if this report had more time, it would have concluded similarly that nutrient offset credit derived from a reforested buffer that was an obligation of stream mitigation credit and had previously or concurrently been sold as such, would not be appropriate as it provides no offset. If it is clear that wetland and buffer mitigation <u>cannot</u> concurrently be sold from the same unit of restored buffer that is sold as nutrient offset credit, then why is DEQ considering allowing a unit of buffer restoration to be sold twice as nutrient offset and stream mitigation?

It is sometimes not clear that buffer restoration is typically a requirement of stream mitigation and heavily influences the cost of stream mitigation credits. For reference, the following language is found in the *Stream Mitigation Guidelines* for the Wilmington District published in 2003 and still used today and illustrates that buffer restoration is typically a required component of stream mitigation projects.

"8. BUFFER WIDTHS & RIPARIAN RESTORATION Buffer protection for stream mitigation is intended to enhance the recovery and protection of stream mitigation projects. <u>In most cases, a protected buffer of a</u> <u>minimum of 50 feet on piedmont/coastal plain streams and 30 feet on mountain streams extending</u> <u>landward from the bankfull elevation on each side of the stream will be required at stream mitigation</u> <u>sites</u>." 2003 Wilmington District Stream Mitigation Guidelines.

Specific examples of relevant credit transaction scenarios are available upon request.

Sincerely, Barrett Jenkins Restoration Systems, LLC From: Barrett Jenkins

sent: Thursday, March 28, 2019 10:36 AM
To: SVC_NPS-comments <NPS-comments@ncdenr.gov>
Subject: [External] Comments on proposed 15A NCAC02b .0703 (b)(4)

The following is a recommended clarification to the proposed rule language for nutrient offsets.

Rule: 15A NCAC 02B .0240 (proposed to change to .0703 Nutrient Offset Credit Trading (b)(4))

Currently proposed rule language:

(4) Nutrient offset credits may be used to satisfy regulatory obligations incurred in the Neuse 01 8-digit cataloguing unit, as designated by the U. S. Geological Survey, below the Falls Lake watershed only if they were generated by a nutrient reduction project within that same geographic area.

We recommend amending the rule language to read as follows:

(4) Nutrient offset credits may be used to satisfy regulatory obligations incurred in the Neuse 01 8-digit cataloguing unit, as designated by the U. S. Geological Survey, <u>outside of</u> the Falls Lake watershed only if they were generated by a nutrient reduction project <u>located outside of the Falls Lake watershed</u>.

Purpose: The recommended language follows the intent of the rules while allowing the statute to govern. If the statute is changed with the intent to provide relief for the Neuse 01 wastewater dischargers there will be no conflict with the related rules. If the statute does not change there will be no conflict with the related rules.

For further discussion please reach out.

Sincerely, Barrett Jenkins Restoration Systems, LLC O: 919.334.9118 From: Cara Conder <cara@waterlandsolutions.com>
Sent: Friday, March 29, 2019 11:03 AM
To: SVC_NPS-comments <NPS-comments@ncdenr.gov>
Subject: [External] Neuse & Tar-Pamlico Rules Readoption - Comment

WLS had one comment pertaining to the Neuse & Tar-Pamlico Rules Adoption and appreciates the opportunity to comments on these rule changes.

The comment applies to Rule 15A NCAC 02B .0703 (d) (3): WLS is in favor of Option 2 regarding the spatially overlapping areas, which is the current rules that are in place. This allows nutrient or buffer credits to be generated in the first 50 feet of a stream restoration project, which is what DWR and the USACE have allowed/approved in the past due to 404/401 permitting process and overlapping impacts.

Thanks, Cara

Cara Conder Senior Project Manager Water & Land Solutions www.waterlandsolutions.com 7721 Six Forks Rd., Suite 130 Raleigh, NC 27615 Direct (843) 446-2312 | Email cara@waterlandsolutions.com



From: Michael Herrmann <mike_herrmann@hotmail.com>
Sent: Wednesday, April 03, 2019 9:59 PM
To: SVC_NPS-comments <NPS-comments@ncdenr.gov>
Subject: [External] Nutrient Rule Re-adoption Comments

DWR Planning Staff:

The following comments are offered regarding the re-adoption of the nutrient strategy rules. Thank you for their consideration. Mike Herrmann

Overall, I support the need to protect our state's waterways, estuaries, and reservoirs from the negative effects and associated costs of nutrient related water quality impacts. I support the goals of these rules and the need to continue implementation of nutrient strategies in our State. I offer the following comments specific to the proposed rules.

15A NCAC 02B .0733 - TAR-PAMLICO NUTRIENT STRATEGY: NEW AND EXPANDING WASTEWATER DISCHARGER REQUIREMENTS

Comment: New dischargers in the Tar Pam and Neuse should have equal Technology-Based Nitrogen treatment concentrations. Item (4)(b)(i-ii) – Due to their comparable geographies it would reason that "Technology-based limits" for nitrogen discharge from new facilities in the Tar would equal those for the Neuse. Proposed rules respective targets are 3.0 mg/L TN compared with 3.5 mg/L for municipal facilities.

15A NCAC 02B .0711 NEUSE NUTRIENT STRATEGY: 13 BASINWIDE STORMWATER

Comment: Shouldn't Lenoir County should be a listed County. OSBM estimates 2020 Greene County population at 21,301 while Lenoir is 57,004. The former is included as subject to this rule while the latter isn't. I'd argue that Lenoir should be subject due to its central location in the lower Neuse watershed, potential growth related to development of Interstate-42 outside of Kinston's current city limits and the county's existing population levels.

15A NCAC 02B .0712 Agriculture

Comment – Collectively, agriculture should achieve a 30% reduction of the N loading from existing agricultural operations. Conversion of agriculture land to urban development shouldn't be sufficient for meeting reduction goals. Research supports this comment. A USGS study of nutrient flows to the Neuse River found that Bear Creek, a largely agricultural waters in Green, Wayne, and Lenoir counties contributed disproportionately to nitrogen loads to the estuary (Spruill et al., 2004). A separate study published in by Lebo and Paerl in 2012 found the Trent River, a largely agricultural watershed in Jones County to disproportionately contribute nutrient pollution to the Neuse Estuary with an increasing trend. If ag sources of pollution continue under the status quo, it will be difficult to achieve nutrient load reduction goals.

15A NCAC 02B .0703 NUTRIENT OFFSET

 What temporal criteria should be used for allowing qualified reductions? Consider adding an Item on to clarify the temporal criteria used to qualify sites. For example, should farmland created after the baseline of a strategy be eligible for land conversion to a lower loading land use? I would suggest that it should as long as it has been in that use for a nominal period of time (e.g., 10 years). This temporal criterion can become restrictive if qualified reductions are based on the baseline period and the strategy is 30 years old. You would not, however, want to encourage deforesting sites to make them immediately eligible for increased nutrient offset reductions.

- Item (b)(5) While it may be desirable to allow sub-items (A) and (B), it's unclear what constitutes an "assessment unit" and the area draining to it. This is the only use of this term in the rule I could find.
- Item (d)(3) –Note: Prefer Option 1. Most compensatory mitigation projects are designed beyond federal requirements and credit generation should be allowed for the portion of compensatory mitigation projects that exceed minimum Federal project criteria. For example, buffers may extend beyond the required 50 feet from stream channel. In such cases where projects exceed requirements, nutrient reductions credits should be allowed but not when overlapping with buffer.
- Item (f)(2) Consider alternative language to "until they are exhausted" for when ledgers are required to be submitted to DEQ. Maybe "until bank closure". I could foresee providers closing a bank prior to exhausting credits. For instance, if nutrient offset requirements are stripped by legislative action and the provider no longer wants to maintain its ledgers in disgust.
- Item (f)(3) Restrictions under this item seem like they could be overly broad. Would existing Ag cost-share funding of exclusionary fencing (i.e., state funding) preclude a streamside reforestation project from being eligible for offset credit generation? Could a similarly funded 20-ft buffer be expanded to 100-ft? Maybe changing the wording to "The Division shall not release any credits for a project if those credits were generated"
- Item (j)(4) I support the inclusion of a margin of safety the rules. To my knowledge, there's no commonly accepted number. The 10% used here is on the low end of what should be considered but is an improvement over what's currently being used.
- Item (j)(4) Specific to the Jordan Strategy, I believe the use of delivery factors does not to
 enhance the strategy and I support their elimination. Generally, they encourage offsets to be
 generated closer to the reservoir at the expense of watershed investments upstream closer to
 where the impacts may have occurred. This deprives upstream communities of much of the
 nutrient strategy benefits. The factors also add complexity to the offset transaction and
 accounting process. Further, existing factors used in Jordan have been contradicted in
 subsequent studies raising the question over whether they are accurate.

From: Steve Tedder <tedderfarmconsulting@gmail.com>
Sent: Friday, February 15, 2019 12:30 PM
To: Huisman, John <john.huisman@ncdenr.gov>
Subject: [External] RE: Neuse & Tar-Pamlico Rules Readoption - 60 Day Public Comment Period Now Open

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to <u>report.spam@nc.gov</u>

John,

I find the statement below to be totally confusing and cannot see your logic. When we know that the point sources have ceased trading or sell of credits within the basin, how can you make such a statement? Those "allocations" are for a specific discharge who is permitted at a specific flow. Those allocations are "forever" at the facility. If one adds a new or expanded facility, they would have to procure sufficient credits before the permit could be issued. I still say the statement is misleading and not accurate and does not in any way reflect reality.

The fiscal note would have been more accurate by just stating what the credits would cost (per/ mgd) for a new or expanded. You do not have to try and guess when one will expand but only lay out the real credit cost per the rule if and when one expands. That would have presented the facts much more accurately.

I'll be honest, how this fiscal note ever got out of the Division or the Department is beyond me. It's a good thing that legislature folks wanted me off the EMC due to my environmental leaning on issues. But, had I been on the EMC I would have unloaded on everyone in the Division associated with this fiscal note. The tone, the undercutting of the EMC, and the misleading information. Not a good way to do business.

Tedder

Very little information is available to project how allocation pricing may change in the future. With rapid population growth and increasing wastewater flows in the Neuse basin, many facilities may see increased nutrient inputs into their facilities. On the other hand, nutrient loading still has not seen a substantial uptick since total nitrogen limits became effective in 2003 due to increasing wastewater treatment efficiencies. With half or more of the waste load allocation unused in the Neuse basin each year, there appears to be considerable room to accommodate new or expanding facilities in the foreseeable future. As with nutrient offset costs, it is difficult to project with confidence whether costs associated with allocation acquisition deviate significantly from future estimates of inflation and therefore no specific adjustment is provided for this analysis.



April 16, 2019

Delivered via Electronic Mail to nps-comments@ncdenr.gov

NCDEQ/Division of Water Resources Nonpoint Source Planning Branch Attention: Mr. John Huisman 1611 Mail Service Center, Raleigh, NC 27699-1611

Re: Neuse and Tar-Pamlico Nutrient Rules Package

Please accept these comments from Sound Rivers, American Rivers, NC Conservation Network, Haw River Assembly, and Waterkeeper Alliance regarding the Neuse and Tar-Pamlico nutrient rules package, or the rules cited as 15A NCAC 02B .0701 and .0703 and the proposal to readopt those rules with substantive changes as 15A NCAC 02B .0229, .0232, .0234-.0240 and .0255-.0258. Commenters represent thousands of members who use and enjoy the Neuse, Tar-Pamlico, Jordan Lake, and other watersheds impaired by nutrient pollution in North Carolina. Our members who support watershed health in North Carolina use these watersheds for fishing, on water recreation, and as sources of drinking water.

Background for Neuse and Tar-Pamlico

The Neuse and Tar-Pamlico nutrient rules were broadly put in place to attain the designated uses of the Pamlico River and Neuse River estuaries by meeting nutrient-related water quality standards. The Clean Water Act requires that states set water quality criteria to support designated uses, evaluate waterways to see if they are meeting criteria, and, if they fail to meet criteria, to pursue restoration through TMDLs or other measures to bring the waterway back to a state to support those uses.¹

Since at least the 1980s excessive nutrient pollution has impaired the water quality of the Neuse and Tar-Pamlico estuaries, leading to algal blooms, low dissolved oxygen, and fish kills.² In 1988 and 1989 respectively the EMC designated the Neuse and Tar-Pamlico as

² DEQ, DWR, Final Neuse River Basinwide Water Quality Plan § 24.1 (2009)(observing that "[e]utrophication became a water quality concern in the lower Neuse River basin in the late 1970s and early 1980s" and that "severe fish kills, algal blooms, and correspondingly high levels of chlorophyll a" led to inclusion of the Neuse River estuary on the 1994 303(d) list of impaired waters.); DEQ, DWR, Tar-Pamlico River Basinwide Water Quality Management Plan § 6.1. (2010)(observing that the entire Tar-Pamlico basin was classified as nutrient sensitive waters in 1989 and that "[c]ontrol of nutrients is necessary to limit algal growth potential, to assure protection of the instream chlorophyll a standard, and to avoid anoxic conditions and fish kills in the state's waterways."



P.O. Box 1854 Washington, NC 27889



¹ See 33 U.S.C. § 1313; see also N.C. Gen. Stat. § 143-214.1 (discussing the EMC's role in establishing classifications and standards to protect water resources).

Nutrient Sensitive Waters.³ The EPA approved a TMDL for the Tar-Pamlico in 1995 which identified an initial goal of reducing nitrogen loading by 30% from 1991 levels and no increase in phosphorus loading from 1991 levels. Similarly, the EPA approved the second phase of the Neuse TMDL in 2002 that identified a target nitrogen load reduction of 30% from 1991-1995 baseline levels. Both TMDLs contain language regarding the use of adaptive management to monitor and update the effectiveness of the TMDL in the event that the measures were not sufficient to achieve load targets to support designated uses.⁴ Nutrient Management Strategies

With the implementation of the rules, at this time all sectors including agriculture, municipal stormwater, and wastewater dischargers identify that they are meeting or exceeding their load reduction targets. However the impairment of both estuaries continues today, and data and models indicate that the problem is in fact growing more severe rather than getting closer to meeting the goals set 22 years ago.

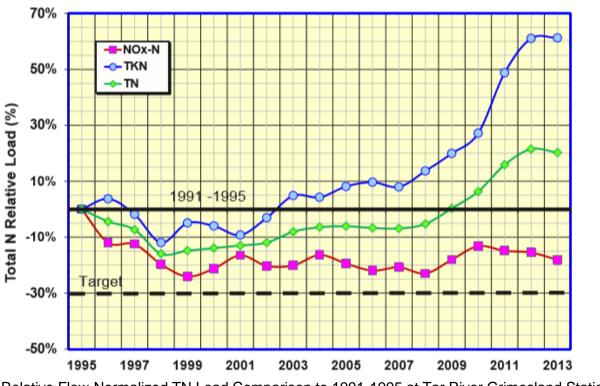
were adopted through rulemaking by the EMC to effectuate the goals of these TMDLs.⁵

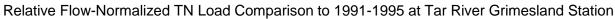
To provide a visual example of the progress controlling excess nutrient pollution, below are two graphs from DEQ's 2014 Nutrient Sensitive Water Strategy section of the Tar-Pamlico River Basin Plan.

³ Id.

⁴ See, e.g., DEQ, Tar-Pamlico NSW Implementation Strategy: Phase II (December 8, 1994)("This level of reduction was selected because it resulted in most of the predicted change in chlorophyll-a and DO that was observed under TN reduction scenarios applied to the model. However, it is likely that further TN reduction will be required, but a more exact target can be established once the model is calibrated to lower nutrient loading conditions.").

⁵ This rulemaking also furthered compliance with the Clean Water Responsibility and Environmentally Sound Policy Act, passed by the North Carolina legislature in 1997. *See* N.C. Sess. Laws 1997-458 § 6.1 (Aug. 27, 1997).

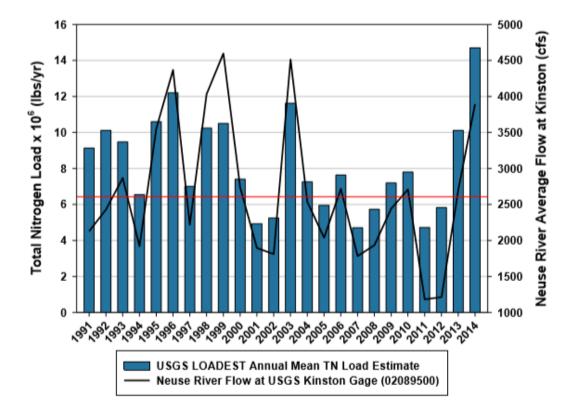




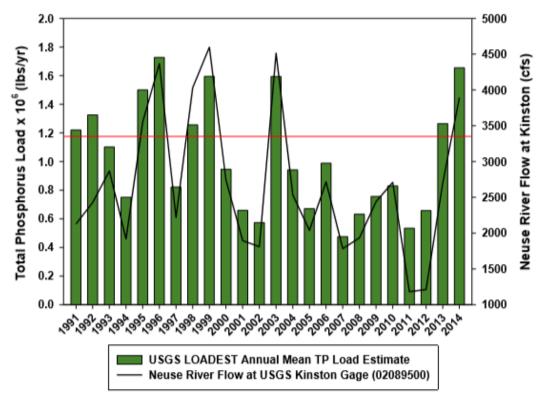


Grimesland Station

The graphs clearly show the increasing nutrient loads to the Tar-Pamlico. DEQ staff are currently working to produce a similar analysis for the Neuse River using current data, but the LOADEST graphs⁶ below show a similar lack of progress in the Neuse.



⁶ Provided by DEQ staff 4/4/2019 produced using USGS LOAD ESTimator (LOADEST)



When seeking an up to date analysis, DEQ staff confirmed in communications this month that, "we aren't seeing any signs that these trends have changed since 2013, I would consider the analysis to still be a current representation."⁷

Background for Jordan Lake

Potential trades in the Jordan Lake watershed would also be subject to some components of these rules as the ratios are now designed to be referenced and used in other trading schemes. Jordan Lake was designated by the EMC as nutrient sensitive in 1983, and has a set of rules⁸ focused on controlling nutrient loading there. Initial goals of 30% reductions in total Nitrogen have been deemed inadequate by the NC Policy Collaboratory for controlling biomass⁹

Improvements in the rule

We're pleased to see several things in this rules package that we support and hope will help put the implementation of these rules on the path towards improving conditions in the Neuse and Tar-Pamlico basins.

The biggest improvement in this rules package is the upfront acknowledgement of the failure of these rules to achieve the nutrient reductions needed to restore the health of both

⁷ Email communication with Nora Deamer, DWR Basin Planner

⁸ 15A NCAC 02B.0262-.0273 and modified by session laws 2009-216 and 2009-484

⁹ Paerl, Hans, et. al. (2019). Nutrient Limitation Dynamics In Jordan Lake Reservoir: Management

Implications [11-12]. Retrieved from https://ie.unc.edu/files/2019/04/3-Hans-Paerl.pdf

basins, and the discussion of steps towards fixing that through adaptive management identified in .0730(4) and .0710(e). We strongly support the recognition that the rules as currently implemented aren't doing what is needed to see true lasting water quality improvement in the basins, and support the Department in doing sufficient analysis to determine what management changes can be made to get there.

Since Department staff and the rule language already acknowledge that there is an ongoing problem and that current modeling does not forecast meeting nutrient reduction levels, we urge the EMC to shorten the time frame for delivery of analysis and recommendations by the Department from 3 years to a sooner date, and change "shall seek to complete" to "shall complete" on page 4 line 10 and page 34 line 38 of the proposed rule package to ensure that the analysis and recommendations are completed. The nutrient rules went into effect in 1997, it is now 22 years later and it is urgent that we get things on track to fix the problem.

Additionally, we support the inclusion of additional local governments identified in .0711 and .0731 to implement stormwater management requirements for each basin. It is important to recognize the impacts, and growth that the region is experiencing and adding additional local governments does this.

Lastly, we are glad to see that the Director shall now "establish more stringent limits for nitrogen or phosphorus upon finding that such limits are necessary to protect water quality standards in localized areas" for both existing and new dischargers in both the Neuse and Tar-Pamlico. Should the rules on a whole leave gaps where localized water quality impairments exist, this backstop is a critical tool to addressing those potential problems.

Trading ratio- 15A NCAC 02B .0703(j)(4)

An effective nutrient trading program can theoretically enable point sources, which often face higher pollutant control costs, to effectuate nutrient management strategies by funding nonpoint source reductions at lower relative costs, thereby achieving more cost-effective improvements in water quality.¹⁰ However, in environmental markets where buyers want to minimize the price of purchasing an offset credit, and sellers want to minimize the cost of producing them, the likelihood that a transaction improves water quality depends on the design and enforcement of trading rules by the regulating agency. In contrast to the measurable, technological reductions achieved by point sources, there is a considerable risk of overestimating nonpoint source reductions when authorizing a trade. Trading ratios provide a mechanism to manage uncertainty associated with the effectiveness of nonpoint source controls.

The ratios proposed in this rule package will have impact on other nutrient impaired waterways that are or may be subject to trading including Jordan Lake and potentially other future waterbodies. The restructuring of the rules so that .0703 is now explicitly inclusive and is

¹⁰ EPA, Water Quality Trading Toolkit for Permit Writers 4 (June 2009), *available at* <u>https://www.epa.gov/sites/production/files/2016-04/documents/wqtradingtoolkit_fundamentals.pdf</u>.

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designed to create a single reference for trading programs for any North Carolina waterbody raises the stakes for getting this right.

Trading ratios must be designed to ensure that the level of reductions required from a point source are offset with a commensurate level of reductions from nonpoint source practices. EPA cautions that, "In developing point source–nonpoint source trading programs and associated NPDES permits, extra care should be taken to ensure that nonpoint source load reduction uncertainty is addressed."¹¹ Appropriate trading ratios account for the variability in effectiveness of practices used to generate offsets as well as the uncertainty regarding whether and when such practices will result in water quality benefits. According to the EPA's National Center for Environmental Economics, "the most common trading ratio for programs that are trading nutrients between point and non-point sources is 2 to 1."¹² Indeed, the vast majority of jurisdictions with established trading ratios for point-nonpoint source nutrient trading ratios have set them at or above 2:1, with multiple jurisdictions setting the ratio at 3:1.¹³

Notwithstanding, the EMC proposes a 1.1:1 ratio if the nonpoint source reductions are not monitored and 1:1 ratio when using "monitored nonpoint source reductions" to generate offsets. These low ratios not only represent a sharp departure from the national norm; they inadequately account for the uncertainty associated with practices intended to reduce nonpoint source pollution, and threaten the ultimate effectiveness of North Carolina's nutrient management strategies. We recommend use of at least a 2:1 trading ratio.

In practical terms, we are asking the EMC to retain the trading ratios incorporated into the existing markets created under the Neuse and Tar-Pamlico nutrient management strategies. The current Neuse rules effectively incorporate a 2:1 point-nonpoint source trading ratio.¹⁴ The Tar-Pamlico rules effectively incorporate a 2.1:1 trading ratio.¹⁵ We are concerned that by drastically relaxing the trading ratios, the EMC is disregarding laws designed to protect against

¹¹ *Id.* at 17.

¹² Cynthia Morgan & Ann Wolverton, EPA, National Center for Environmental Economic, *Water Quality Trading in the United States* (June 2005), *available at* https://www.epa.gov/sites/production/files/2014-12/documents/water_quality_trading_in_the_us.pdf.

¹³ See Jennifer Vogel & Leon Szeptycki, Environmental Law and Conservation Clinic, A Survey of *Trading Ratios Used for Generation of Credits in Water Quality Trading Programs* (July 2012).

¹⁴ The required offset charge for new or expanding dischargers in the Neuse rules is 200% of the cost at which the State has been obtaining reductions from nonpoint sources. 15A N.C. Admin. Code. 02B .0234(7)(b), (8)(d). "Thus, if we were to assume that a payment . . . has the effect of increasing the State's spending on nonpoint source BMPs by a similar amount, the offset rate would have a 2:1 trading ratio embedded into it." Environomics, *A summary of U.S. effluent trading and offset projects* (1999) (prepared for Dr. Mahesh Podar, U.S. Environmental Protection Agency, Office of Water), available at *http://www.environomics.com/Effluent-Trading-Summaries_Environomics.pdf*.

¹⁵ (identifying a range of costs for nonpoint source BMP installation and explaining that "[t]o estimate a single trading value, NCDEM multiplied the median of this range (\$13/kg N) by a safety factor of 2 and then added a 10% administrative cost.").

the weakening of existing water quality protections, especially when those protections are part of a federally-approved strategy to restore designated uses.¹⁶

The EMC's proposed ratios place far too much faith in the effectiveness of nonpoint source monitoring to confirm loading reductions. It is often difficult to evaluate the effectiveness of nonpoint sources controls through monitoring.¹⁷ For instance, nonpoint source pollution is highly weather-driven.¹⁸ Yet, the proposed rules make no attempt to address this seasonality through monitoring requirements.¹⁹ Nonpoint source pollution reductions can also take years to manifest as changes in instream water quality, cautioning against over-reliance on monitoring to confirm effective implementation.²⁰

Relying on monitoring is particularly unjustified when the relevant rules fail to clarify the nature of monitoring that is required. We are concerned that, although the proposed rule refers to "monitored nonpoint source controls" the use of which can reduce the trading ratio, they are silent as to the requisite monitoring frequency, location, and duration. The rules also do not specify monitoring standards. Ultimately, this creates considerable confusion regarding the type of monitoring sufficient to relax the trading ratio. The EMC cannot confidently assert that monitoring accounts for uncertainty when the rules fail to articulate the requisite monitoring.

https://www.epa.gov/sites/production/files/2019-02/documents/trading-policy-memo-2019.pdf.

¹⁶ See, e.g.. 33 U.S.C. § 1342(o) (guarding against backsliding by generally prohibiting issuance of permits containing "effluent limitations which are less stringent than the comparable effluent limitations in the previous permit"); 33 U.S.C. § 1313(d)(4)(A) ("For waters identified under paragraph (1)(A) where the applicable water quality standard has not yet been attained, any effluent limitation based on a total maximum daily load or other waste load allocation established under this section may be revised only if (i) the cumulative effect of all such revised effluent limitations based on such total maximum daily load or waste load allocation will assure the attainment of such water quality standard, or (ii) the designated use which is not being attained is removed in accordance with regulations established under this section.").

¹⁷ Adena R. Rissman & Stephen R. Carpenter, Progress on Nonpoint Pollution: Barriers & Opportunities 144 Dædalus, the Journal of the American Academy of Arts & Sciences, Vol. 3, at 36 (2015) ("[A] growing number of studies from around the world show that it is extremely difficult to determine the efficacy of interventions aiming to reduce nutrient runoff from watersheds."), *available at*

http://labs.russell.wisc.edu/rissman/files/2011/12/Rissman-Carpenter-2015-Nonpoint-Pollution-Challenges-Opportunities-Daedalus.pdf; David P. Ross, EPA, Updating the Environmental Protection Agency's (EPA) Water Quality Trading Policy to Promote Market-Based Mechanisms for Improving Water Quality 3 (Feb. 6, 2019)(noting that the environmental benefits of nonpoint source reductions "may not be immediately or precisely measurable in the resource"), *available at*

¹⁸ S.A Dressing et. al, EPA, Monitoring and Evaluating Nonpoint Source Watershed Projects 2.2.1.3 (May 2016).

¹⁹ S.A Dressing et. al, EPA, Monitoring and Evaluating Nonpoint Source Watershed Projects 2.2.1.3 (May 2016) ("In cases where available water quality data are not sufficient to assess seasonality in a specific watershed, it may be necessary to perform seasonal synoptic surveys . . . , collect year-round samples initially, or rely on watershed modeling to better define seasonality and facilitate fine-tuning of the monitoring design.").

²⁰ Suzie Grenhalgh & Mindy Selman, *Comparing Water Quality Trading Programs: What Lessons Are There to Learn*?, 42 Journal of Regional Analysis & Policy, Vol. 2, 104 (2012)("[W]here there are long time-lags between reduced nutrient discharges and observed improvements in water quality, additional metrics may be needed to demonstrate progress towards water quality goals.").

Finally, when authorizing water quality trades, uncertainty is not the only factor that can or should inform trading ratios.²¹ For instance, we recommend consideration, particularly in the context of point-nonpoint source trading, of equivalency ratios adjusting for the fact that the composition of point and nonpoint sources discharges can differ with respect to the forms of the nutrients discharged. As observed by EPA,

For nutrients, the effect on water quality is related to the percent of the nutrient that is biologically available in the source's discharge. Biologically available nutrients are readily available for uptake by the biota. Nutrients can be present in forms that are immediately biologically available and in forms that are less accessible to the biota. Excess biologically available nutrients contribute to eutrophication and degradation of water quality. Those forms of nutrients that are not immediately biologically available can become accessible to the biota (biologically available) through different biological and chemical cycling mechanisms. Hence, nutrients can be present as readily biologically available or bound to sediment, and depending on environmental factors, such as climate, apparent geology, residence time, and so on, have different effects on the waterbody of concern. The relative biological availability of nutrients in the trading sources' discharges should be incorporated into the equivalency ratio.

In addition, it is important to consider the location of the facilities involved in the trade.²² We appreciate efforts to geographically restrict trading markets in 15A NCAC 02B .0703(b) to ensure that credits are purchased within appropriate subwatersheds. However, we lament the lack of clear standards to account for the relative location of the seller and the water body the relevant strategy is designed to improve. It is imperative to account for the watershed features and distance between a pollutant source and the water body in need of protection. While the proposed 15A NCAC 02B .703(j)(5) states "Delivery factors shall be applied to estimate nutrient reductions to an impaired water body subject to a nutrient strategy *if required under rules of this Subchapter for that strategy*," we recommend development and application of delivery or transport factors to inform any nutrient trading.²³

²¹ EPA, Water Quality Trading Toolkit for Permit Writers 30 (June 2009)"Although existing trading programs use various types of trading ratios and different terms to describe them, the basic categories of trading ratios are delivery, location, equivalency, retirement, and uncertainty.")

²² EPA, Water Quality Trading Toolkit for Permit Writers 12 (June 2009)("Inappropriate trading across geographic or hydrologic units (i.e., where the dischargers are not both contributing to the same water quality problem) will not improve, and could worsen, water quality downstream of the credit purchaser. Water quality trading is intended to provide opportunities for efficiently achieving and maintaining water quality standards within watersheds, as opposed to cleaning up one watershed at the expense of another.").

²³ Notably states like Virginia use ratios to account for the relative location of the point source buyer and the nonpoint source seller and their relative contributions to instream impairment. 9 VA Admin. Code § 25-820-70 (II)(B)(1)(b).

Agriculture rules- 15A NCAC 02B .0238; 15A NCAC 02B .0256

Although rules in both the Neuse and the Tar-Pamlico nutrient management strategies purport to address contributions from various types of agriculture,²⁴ in practice their application is limited to cropland agriculture, meaning they fail to account for the proliferation of industrial animal agriculture and the resulting water quality impacts.²⁵ The EMC's failure to effectively regulate large sources of nutrients dooms nutrient management strategies in the Neuse and Tar-Pamlico to failure. We cannot expect the targeted improvements in water quality to be achieved until the agency gets serious about targeting these sources of nutrient loading.

A substantial and growing body of scientific evidence demonstrates that animal feeding operations contribute significant nutrient loads to water bodies in Eastern North Carolina.²⁶ Indeed, DWR basin planners have consistently observed that industrial animal operations "are having a significant negative impact on the Neuse River water quality"²⁷ and repeatedly noted the adverse impact of these operations on water quality in the Tar-Pamlico watershed.²⁸ A nutrient management strategy has no hope of reducing loading that is effectively ignored. We urge the EMC to conduct a long overdue analysis of the contributions of industrial swine and poultry operations to nutrient loading in the Neuse and Tar-Pamlico watersheds.

Ignoring animal agriculture²⁹ compounds the inherent limitation stemming from the failure to consider atmospheric deposition of nitrogen when developing these nutrient

²⁴ See, e.g., 15A N.C. Admin. Code 02B .0236 (asserting that the Neuse Rules apply to "[a]II persons engaging in agricultural operations in the Neuse River Basin, including those related to crops, livestock, and poultry").

²⁵ See NCDA&CS, 2018 Annual Progress Report (Crop Year 2017) on the Neuse Agricultural Rule (15 A NCAC 2B.0238) (reporting "calculations of nitrogen loss from cropland agriculture adjusted for acreage in the basin" and noting that "livestock-related nitrogen and phosphorus reducing BMPs" are not evaluated); NCDA&CS, 2018 Annual Progress Report (Crop Year 2017) on the Tar-Pamlico Agricultural Rule (15A NCAC 02B .0256) (same).

²⁶ Stephen L. Hardin, U.S. Geological Survey Sci. Investigations Report 2015-5080, Surface-water Quality in Agricultural Watersheds of the North Carolina Coastal Plain Associated with Concentrated Animal Feeding Operations 50 (2015), www.pubs.usgs.gov/sir/2015/5080/pdf/sir2015-5080.pdf (remarking that the higher nutrient ion concentrations in watersheds with CAFOs indicates "the influence of swine-waste manure storage or applications at the SW sites and swine- and (or) poultry-waste manure storage or applications at the SP sites" on surface water quality); Michael A. Mallin et al., *Industrial Swine and Poultry Production Causes Chronic Nutrient and Fecal Microbial Stream Pollution*, 226 Water, Air, & Soil Pollution 407 (2015), *available at* http://link.springer.com/article/10.1007/s11270-015-2669-y (detailing chronic nutrient pollution from CAFOs).

²⁷ DEQ, DWR, Final Neuse River Basinwide Water Quality Plan § 17.1.4 (2009), *available at* https://deq.nc.gov/about/divisions/water-resources/planning/basin-planning/water-resource-plans/neuse-2009.

²⁸ DEQ, DWR, Tar-Pamlico River Basinwide Water Quality Management Plan § 7.1. (2010), available at https://deq.nc.gov/about/divisions/water-resources/planning/basin-planning/water-resource-plans/tar-pamlico.

²⁹ The proposed .0732(c)(2) language identifies that if three annual reports show that the Basin did not meet its nitrogen and phosphorus reduction goals, that the Basin Oversight Committee shall work with Soil and Water and other partners to seek reduction actions and bring agriculture back into compliance. All parties are aware of the ongoing impairment, and current reporting and accounting methods state that all sectors have exceeded reduction goals for years, this type of corrective action should be required in the event of only a single year if agriculture does not meet reduction goals.

management strategies.³⁰ Approximately 80% of ammonia emissions in the country originate from livestock waste.³¹ Nutrients from animal waste can enter surface waters through atmospheric deposition following manure spraying or spreading.³² Yet, despite a sizable number of large hog and poultry operations in both the Neuse and Tar-Pamlico watersheds, there is no attempt to evaluate, much less regulate, ammonia emissions or their impacts on chlorophyll-*a* levels.³³

The EMC cannot improve water quality in the Neuse or the Tar-Pamlico basis without meaningful evaluation and reduction of pollution from industrial animal agriculture. We urge the agency to acknowledge its failure to do so, and to take steps to collect and evaluate data to inform overdue action on that front rather than continue to rely on a paper exercise focused solely on row crop agriculture.

Generation of nutrient offset credits and stream mitigation credits in spatially overlapping areas- 15A NCAC 2B .0703(d)(3)

The EMC specifically solicited feedback through this rulemaking process on the concept of using the same locations to generate different types of credits for various regulatory frameworks on the same site.

North Carolina already has a history grappling with the issues presented here when EBX sold water quality credits to NC DOT to offset wetland impacts, and then turned around and without any additional management activities or justification sold credits to NC DENR to offset nitrogen impacts to the Neuse Basin.³⁴ This sale ignored the role that wetlands serve in treating nutrients naturally, something that is already part of the functions and services that wetland mitigation is required to replace.³⁵

³⁰ See 15A N.C. Admin. Code. 02B .0256(a)(2)("This Rule may not fully address the agricultural nitrogen reduction goal of the Tar-Pamlico Nutrient Sensitive Waters Strategy in that it does not address atmospheric sources of nitrogen to the Basin, including atmospheric emissions of ammonia from sources located both within and outside of the Basin."); 15A N.C. Admin. Code 02B .0238(8)(g) ("The Environmental Management Commission acknowledges that best management practices under the standard management practice option of this Rule do not fully address nitrogen loading, including atmospheric emissions and deposition, from animal operations.").

³¹ EPA, Review of Emission Factors and Methodologies to Estimate Ammonia Emissions from Animal Waste Handling (April 2002).

³² See JoAnn Burkholder et al., *Impacts of Waste from Concentrated Animal Feeding Operations on Water Quality*, 115 ENVTL. HEALTH PERSP. 308, 309 (2007), *available at*

https://www.ncbi.nlm.nih.gov/pmc/articles/PMC1817674/pdf/ehp0115-000308.pdf ("Inorganic N forms are added to the atmosphere during spray practices, and both ammonia and phosphate can also adsorb to fine particles (dust) that can be airborne. . . . [A] significant proportion of the total ammonium from uncovered swine effluent lagoons and effluent spraying . . . reenters surface waters as local precipitation or through dry fallout.").

³³ Atmospheric deposition of ammonia is still nonpoint source pollution that should be considered in nutrient management strategy development. Under federal law, any source of water pollution that does not meet the definition of "point source" under the Clean Water Act is considered a nonpoint source. See 33 U.S.C. § 1362 (defining "point source"); see also S.A Dressing et. al, EPA, Monitoring and Evaluating Nonpoint Source Watershed Projects 1.1 (Feb. 2016) ("Atmospheric deposition, the wet and dry deposition of airborne pollutants onto the land and into waterbodies, is also considered to be nonpoint source pollution.").

 ³⁴ Dan Kane, *EBX Is Paid Twice for Wetlands Work*, News & Observer (Dec. 8, 2009)
 ³⁵ 33 CFR § 332.3

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Of the options proposed in this rulemaking, we would support option 1. In other words, we do not support any caveats to the requirement that "reductions shall not include those already implemented to satisfy other requirements under the same nutrient strategy; other local, state or federal requirements; or those resulting from state or federal compensatory mitigation requirements."³⁶ The ability to essentially double dip for credit generation on the same spatial area would undermine the full ecosystem benefits intended for various credit and mitigation schemes. The consequence of any such caveat would be to limit the net loading reduction required under these rules. Moreover, were the EMC to permit such credit stacking, it would exacerbate our concerns about the failure to account for uncertainty in proposed point-nonpoint source trading ratios. Various types of mitigation and offset credits should be generated by practices and areas dedicated solely to a single program.

Other issues

Currently, new and expanding dischargers must purchase 30 years of offsets prior to obtaining NPDES permit coverage.³⁷ The draft rule proposes to reduce the requirements for up front securing of credits from 30 years to 10 years. The 30 year requirement should remain in place. The facilities seeking these types of offsets are not designed around a 10 year time frame of operation. Moreover, DEQ would likely not reject a permit application something like a municipal sewage treatment plant if after 2 NPDES permit renewal cycles there was some delay in securing credits for the next 10 years.³⁸ We urge the EMC to require the type of longer term thinking that operating these types of facilities requires and retain the original 30 year requirement.

The limits for regulation of point source discharges should be dropped below the current 0.5 mgd amount. Often these smaller operators are the ones that have the highest concentrations of nutrients in their effluent and are least capable of managing their system due to limited resources. The rules should develop a path for bringing all permitted point source dischargers into the regulatory framework. This will improve nutrient inputs into the estuary and will have additional watershed wide benefits for the river systems as a whole.

Considering the similarities between watersheds, EMC and the Department should clarify the rationale behind the differing mass load equivalent concentration requirements for new dischargers. The Neuse identifies a 3.5 mg/L nitrogen monthly average limit for new municipal sources, and 3.0 mg/L for the Tar.

³⁶ 33 N.C. Reg., Issue 16 at 1700 (Feb. 15, 2019), *available at*

³⁷ 15A N.C. Admin. Code. 02B .0240(e)(4)("The offset payment shall be an amount sufficient to fund 30 years of nutrient reduction.")

³⁸ For example, EPA estimated the Expected Useful Life (in years) of 23 components of a water treatment system; 20 out of 23 components had an expected useful life of 10 or more years, and more than half of the components had an expected useful life of 30 or more years. EPA, *Asset Management: A Handbook for Small Water Systems* 9 (Sept. 2003).

Industrial dischargers should not be exempt from the conditions of .0733(5) based on a demonstration that their waste stream only has nitrogen and phosphorus at or below background levels. Current levels are too high, adding at that background level may exacerbate impairment.

Stormwater continues to be the most significant source of pollution to the waters of the U.S. and the State. Whenever possible policies should be adopted to reduce the impact of stormwater pollution from both existing and new development and run-off from other managed landscapes like agricultural lands. It is important that the stormwater rules are expanded to the smaller but growing communities within the watershed so that they can develop responsible stormwater management programs. Numerous scientific studies have shown that water quality and quantity impairment begins when as little as 8% of a catchment has been converted to impervious surface, requirements for stormwater management should be set to begin when that threshold has been exceeded. Runoff volume matching is a good way to minimize the impact that stormwater has on an ecosystem and we support that addition to the rules. A continuing oversight of the rule is its inability to address existing development's stormwater impact. At a minimum the Local Program should require that incentives be developed for implementing projects in already developed areas on both public and private property that would reduce the contributions of stormwater pollution from those landscapes.

The greater purpose of resolving the impairment is to improve the ecosystem health of the full river systems, this would be best addressed through a watershed management approach which is not envisioned in this rule package. The goals should be focused on creating actions throughout the watersheds that build a system that will- in perpetuity- improve water quality for people and nature. The Department should strive to set up metrics within the rules that drive point source dischargers to improve their treatment capabilities in line with the latest cost effective treatment practices and ensure that facility operators are appropriately trained to manage their systems. The control of nonpoint source pollution, primarily through stormwater, should take the same approach of developing metrics that encourage the replication of the natural processes as much as possible and the restoration of degraded landscapes throughout the watershed. And lastly, a watershed approach must account for the full scope of activities that are creating the impact; if the rules do not do that it will force those that are subject to the rules to unfairly carry the burden of the pollution created by others.

Conclusion

We want to especially acknowledge the addition of language that recognizes that the rules have not successfully reduced impairment in either the Neuse or Tar-Pamlico in the 22 years since implementation began, and that starts the process of re-evaluating measures needed to effectively do so. We hope that this process will begin promptly and that agency staff will include all sources of nutrient pollution in that evaluation, and recommend steps to truly get us on the path toward restoration and removing the impairment from these basins.

However, we are also very troubled by a concerted focus to reduce potential environmental benefits from current and future trading programs by reducing the ratios required for point to non-point source offsets. This goes against all guidance from EPA and flies in the face of the best available science. It is especially troubling as the demand for these types of trades is expected to increase in both basins in the near future as well the applicability for trading programs in Jordan Lake and other watersheds.

We urge the EMC and DEQ staff to finalize and implement rule language which can truly lead to a healthy Neuse and Tar-Pamlico and will serve as a model framework for the restoration of other watersheds in North Carolina.

Sincerely,

Forrest English, Pamlico-Tar Riverkeeper Matthew Starr, Upper Neuse Riverkeeper Katy Langley Hunt, Lower Neuse Riverkeeper Sound Rivers

Peter Raabe American Rivers

Emily Sutton, Haw Riverkeeper Haw River Assembly

Grady McCallie NC Conservation Network

Will Hendrick Waterkeeper Alliance Public Hearing – Neuse/Tar-Pam rules March 26, 2019 Kinston, NC Hearing Officer: EMC Commissioner Steve Keen

DEQ staff present:

John Huisman Linda Culpepper Mike Templeton Jim Hawhee Trish D'arconte Julie Ventaloro Rich Gannon

Hearing began: 6:05 p.m.

Intro by Commissioner Keen [see script]

Presentation by DWR staff John Huisman [see .ppt slides]: 6:11 p.m. – 6:33 p.m.

Speakers:

1. John C. Hall – Tar Pamlico Basin Association

It's a pleasure to come to NC. Going to give comments on Tar-Pam new and expanding rule, .0229, .0773, I believe. I represent the Tar-Pam Basin Association. Been representing them for 28 years. Original point source-nonpoint source trading program is concept I came up with in 1990. The other person in the room that has this same long history as I do is Steve Tedder. I convinced him to set up the first water quality credits trading program in this state. We have a concern with rule that's being amended. We requested it not be adopted. The prior rule recognized that new and expanding discharge requirements only apply to non-association members. Association members were not to receive any limits upon expansion. Association is governed by a specific agreement negotiated 4 times over 28 years. Governed by specific agreement with a load cap, which association members have met and exceeded, doing better than the targets for 28 years. Phase 4 agreement that just finished 4 years ago, and 2015 permits. Mike Templeton, Rich Gannon, John Huisman were all on the team getting new agreement into place. That agreement ensured degradation would not occur. Association by its establishment and working with state has provided major benefits on monitoring. We developed TMDL for this system. We paid for modeling to be done to ensure targets were reasonable and appropriate. We have worked hard to make sure we met our end of the deal and the state was appropriately served by having this program in place. Expansions and new members are covered by the load cap in the agreement. Does not establish that we go to 3 nitrogen on new expansion. In our view, the new rule eliminates the benefit of what the association is established for. By imposing separate requirements on new and expanding facilities, establishes non-cost effective approach. There would be no need for this association anymore. In short, it's unfortunate but we would be forced to challenge this rule if it were

adopted. It would be a real shame. We've worked cooperatively for decades and met and exceeded our requirements. I had follow up discussions with staff. I'm not pointing fingers. Staff believed they were doing something that was in our interest. When I looked at it more closely from technical and legal perspective, creates complications and conflicts that were not apparent at first and does damage to how load cap is structured. I do not believe there would be an objection by staff to going back to the old way, meaning we are controlled by the load cap. If a non-association person wants to expand or become new discharger, they would have to meet limits of technology – that's fine. As far as association is concerned, we would appreciate if this could be reconsidered and go back to where we were. We think all would benefit by that approach. If you, Commissioner Keen, have any questions as to historical perspective about association, benefits, where we are in creating improvements to the estuary, I'm here.

2. Adam Waters - City of Washington

I am the public works director for the City of Washington and vice chair for the Tar-Pam Basin Association. City of Washington concurs with comments made by John Hall. Specific to Washington – Rule 02B .0229. Washington is located in Beaufort County, on banks of Tar, where Tar and Pamlico meet. Citizens of Washington love the river. They've come to expect a high quality water because we have a lot of recreation, swim, fish. River is important to the citizens. It is, in fact, second most important resource behind the people. However, Washington is in a Tier 1 county. We are low on the economic benefits totem pole. Washington is also unique in basin in fact we will be one of the first members of basin association that will have to expand its plant. These rules will affect us at that time. In 2018, Washington's flow into plant reached 73% of its permitted capacity, a growth of 7% over the previous year. We are planning the next expansion. If these rules are in place, our allocation will be cut in half for nitrogen and even more so for phosphorus. Without these rules, we will retain same allocation when we expand – we won't be granted any additional nitrogen. Our parts per million will decrease, but would have same poundage. Citizens and rate payers of Washington will have to bear expense of that additional treatment costs as associated with these rules. Our current estimates to increase capacity in plant is between 9 and 10 million dollars – that is without these rules in place. Neighboring communities will also be impacted. City of Washington is in opposition of these rules as presented.

3. David Springer – Greenville Utilities and TPBA

Assistant Director of Water Resources for Greenville Utilities and current chairman of Tar Pam Basin Association. Opposed in regard to inclusion of members of Tar Pam Basin Association – commenting on rules [notetaker note: I missed the first two rules Mr. Springer listed] 02B .0229 .0733. Sent email to staff previously to object to rules along with reasons. Nutrient compliance strategy is collective effort to retain nutrient levels below TMDL. Strategy has been proven to work over 30 years it has been in place. We have funded efforts that contribute to the protection. Current strategy was recognized by our predecessor. It's an advantageous way for point source discharges to maintain nutrient levels below TMDL. This model continues to be best way for our community to maintain this strategy. New rules undermine strategy that was developed with state for point source discharge in the basin. We have been told that impacts to our government were not taken into account by staff. We were told by staff that staff was not opposed to excluding us from these rules. That is our request – to be excluded from these rules.

4. Sam Davis – farmer Declined to speak

Last speaker concluded at 6:52 p.m.

Commissioner Keen closed hearing at 6:52 p.m.

Public Hearing – Neuse/Tar-Pam rules March 28, 2019 Clayton, NC Hearing Officer: EMC Commissioner JD Solomon

DEQ staff present:

John Huisman Linda Culpepper Mike Templeton Jim Hawhee Nora Deamer Julie Ventaloro Rich Gannon Ricchi [don't know his last name]

Hearing began: 6:03 p.m.

Intro by Commissioner Solomon [see script].

Recognized: Rep. Donna White, NC General Assembly Adam Lindsay, Clayton Town Manager

Presentation by DWR staff John Huisman [see .ppt slides]: 6:11 p.m. – 6:30 p.m.

Commissioner Solomon opened it up to a few questions:

- Q. Will DEQ consolidate the SNAP tools for ease of use by developers, local governments?
- A. [notetaker missed the answer]
- Q. The model plan will be ready in 4 months will there be a comment period for that too?
- A. We will collaborate with LG's to develop it. It's 4 months after rules go into effect.
- Q. Waste load allocations will any come down in the future for certain sectors?
- A. We have no plans to do so.

Q. Have you coordinated with Phase 2 program? A lot of LG's are already implementing.

A. We have been talking with Stormwater Permitting Unit and we took that into consideration. Stormwater doesn't always address nutrients specifically.

Commissioner Solomon - These rules were passed around 1999. It's 20 years later. We need your comments, including about costs and benefits. -- Recognized former commissioner Butch Lauder.

Speakers:

- James Warren Town of Clayton wastewater treatment superintendent. Have been in that
 position for 25 years. LNBA, Neuse River Compliance Association executive boards. I'm
 speaking to rules 02B .0234 and .240 [sic]. Clayton supports revisions as written. Will help
 mitigate costs of mitigation offsets for new and expanding wastewater facilities by allowing tenyear permit purchases at 1:1 point ratio. Due to time constraints of this hearing, will be brief.
 Town will submit written comments to clarify comments in fiscal note. Clayton, Johnston
 County and towns and cities of Wake County have experienced positive growth after past few
 decades. We are faced with economic challenges to provide quality of life for citizens and
 industrial partners. Clayton population has grown by a significant jump. Based on population
 and industrial growth, we've had to develop other wastewater capacity resources. Town
 operates 2.5 mgd wastewater reclamation facilities, treat up to 2.34 mgd of bulk wastewater.
 Contract with Raleigh is due to expire in 2027. So we're going to have to expand. Nutrient
 offsets will be a big part of this cost. In a nutrient study we commissioned, construction
 estimated around 100 million dollars and additional 70 million dollars for nutrient offset credits.
 We feel these changes will help us mitigate some of those burdens.
- 2. Barry Parks, vice chair of Neuse River Compliance Association and City of Wilson. Been 37 years in the water and wastewater business. We would like to thank EMC for its attention to our concerns. We support revisions to wastewater rule as pertains to Neuse estuary. Will also provide written comments. NRCA formed in 2002 and received NPDES permit NCC00001[sic]. There are 22 organizations in the organization, represent 25 NPDES permitted facilities. We are united as an organization. There are 5 here tonight. We have Wilson, Town of Clayton, Johnston County, City of New Bern, City of Raleigh. NRCA has been in compliance with its permit for 15 years. Members achieve average end-of-pipe discharge of 2.54 on average. Wilson had discharge of 1.98 mg/l. Capital investment exceeds 429 million from 1997 to 2014. We're still paying two different loan payments back for wastewater improvements. Expensive for our customers. Continued millions of dollars of investments since 2014. In 2018, we had 6 members had to lease nitrogen – small members. Nitrogen is a commodity, there is really no nitrogen available. We have additional nitrogen that we could sell, but Wilson has to retain that for its own growth. It's really not for sale. It's like asking to sell one of my children. Permitted flow of members of NCRA was 178 mgd. At end of 2018, permitted flow was 193 mgd. Making expansions to allow for growth is a wise investment.
- 3. Forrest English with Sound Rivers. Tar Pam Riverkeeper with Sound Rivers. [notetaker notes hard to hear speaker] Appreciate adaptive management, would be opposed to credit double dipping. Biggest thing is ratios for point source to nonpoint source 1. Gist is those ratios are far too low and fail to recognize ongoing impairment of the estuary. Other states have gone with ratios generally in 2:1 or 3:1. EPA has stepped in to address programs that are insufficient. Strongly recommend ratios be raised at least to 2:1. Also concerned with state being exposed to legal risk, anti-backsliding and anti-degradation. Relates to adaptive management and goals talking about 3 years in both cases. Since we're already aware of impairment, confused why that would wait 3 years and not shorter timeframe. Will submit written comments.

4. Shandra Farmer, Johnston County public utilities. In order to meet our near term growth demands, county is designing 4 mgd expansion to wastewater plant. Our permit provides effluent limits for up to 13.5 mgd, however county's nitrogen allocation is only sufficient for 11.5 mgd. We have been seeking leasing or purchase nitrogen allocation. 1,000 pounds per year is only we have found. We have been unable to identify any other additional allocation. County must secure this additional nitrogen allocation in order to obtain a modified NPDES permit and begin our construction by 2020. These are immediate needs of industrial, institutional, and residential developments. Results in new system development fees that far exceed every other area of the state and country. Puts additional burden on point source discharges. County supports wastewater rule revisions, in particular wastewater percent reduction.

Last speaker concluded at 6:56 p.m.

Commissioner Solomon closed hearing at 6: p.m.