Roy Cooper Governor

J. Eric Boyette Secretary of Transportation



R. Preston Hunter Executive Director

## STATE OF NORTH CAROLINA Global TransPark Authority Foreign Trade Zone 214

August 25, 2023

Mr. Tommy Fennel Chief, Regulatory Division Wilmington District Corps of Engineers 69 Darlington Avenue Wilmington, North Carolina 28403-1343

Dear Mr. Fennel:

This correspondence is related to the letter which the North Carolina Global TransPark (NCGTP) Authority received from the U.S. Army Corps of Engineers (USACE) on April 17, 2023 concerning the Section 404 permit for the NCGTP (Action ID. SAW 1992-02851), currently set to expire in October 2028. In this letter, the USACE stated that the approved wetland mitigation credits developed for the NCGTP could be at risk. To avoid such risk, the USACE recommended that the NCGTP Authority move to include the existing wetland mitigation credits under the North Carolina Department of Transportation (NCDOT) Umbrella Mitigation Banking Instrument (UMBI) so that they would be protected in the future. The NCGTP Authority intends to pursue this recommendation and seeks authorization for this action. Enclosed, please find the UMBI Addendum documentation prepared by NCDOT Environmental Analysis Unit. NCGTP Authority requests that USACE review the proposed documentation and provide any comments so that this action can be finalized. If you have any questions or need additional information, please contact LeiLani Paugh at <a href="https://lipaugh@ncdot.gov">lypaugh@ncdot.gov</a> or 919-215-0746. Thank you for your help in protecting these valuable mitigation assets.

Sincerely,

Docusigned by:

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Presson Hunter

Presson Hunter

Executive Director

North Carolina Global TransPark Authority

CC: Tom Steffens, USACE LeiLani Paugh, NCDOT

# GLOBAL TRANSPARK MITIGATION SITES ADDENDUM TO THE NCDOT UMBI

DATE: August 2023

#### 1.0 BASELINE INFORMATION

The N.C. Global TransPark (NCGTP) Mitigation Sites are comprised of approximately 4566 acres, distributed across three properties, as follows:

Dover Bay 3100 acres Frog Hollow 1100 acres Stonyton Creek 366 acres

Two of the properties (Dover Bay and Frog Hollow) are located in Craven County, North Carolina, while the Stonyton Creek property is located on-site at the NCGTP facility in Lenoir County (Figure 1). The Dover Bay and Stonyton Creek properties are owned fee simple by the NCGTP Authority. In addition, a conservation easement was placed on the Dover Bay property and transferred to the NCWRC. The Frog Hollow site consists of a conservation easement which was acquired by the NCGTP Authority and subsequently donated to the N.C. Coastal Land Trust. These three properties were acquired to provide compensatory wetland mitigation to offset impacts resulting from construction of the NCGTP airport and facilities.

All three sites (as well as the NCGTP airport) are in U.S Geological Survey (USGS) Hydrologic Unit (HUC) 03020202 of the Neuse River Basin.

#### 2.0 BANK SITE SELECTION

The NCGTP Mitigation Sites were acquired by NCGTP Authority starting in 1999.

### 3.0 BANK SITE PROTECTION INSTRUMENT

A Compensatory Mitigation Plan was prepared for the three NCGTP Mitigation Sites and included in Appendix K of the Final Environmental Impact Statement (FEIS) for the NCGTP, as amended by the modified schedule submitted to the U.S. Army Corps of Engineers (USACE) on October 12, 1997 and February 5, 2009. The NCGTP Mitigation Sites will be subject to the terms of the NCDOT UMBI, as well as the Compensatory Mitigation Plan included in the FEIS. Any conflict in terms or conditions of the documents listed above will be superseded by the NCDOT UMBI dated April 2009.

#### 4.0 OBJECTIVES

The goals of the NCGTP Mitigation Sites were to restore, enhance and preserve wetland systems on the three properties to offset permitted impacts associated with the NCGTP. Degraded wetland sites were returned to a natural condition through hydrologic restoration and vegetation replanting. Wetland restoration activities attempted to restore the highest level of wetland functioning practicable on the property within current constraints.

#### 5.0 MITIGATION WORK PLAN

The Dover Bay site consists of a large, non-riparian Carolina Bay and included components of wetland restoration, preservation, and enhancement. The Frog Hollow site consists of riparian wetland preservation in the floodplain of the Neuse River. The Stonyton Creek site includes components of riparian wetland restoration, preservation, and enhancement along the floodplain of Stonyton Creek, adjacent to the NCGTP facility.

## **6.0 MONITORING REQUIREMENTS**

Monitoring was required at the Dover Bay and Stonyton Creek sites. Dover Bay monitoring was completed in 2009, and Stonyton Creek was completed in 2011. No monitoring was required at the Frog Hollow preservation site. All three sites have been successfully closed out with the regulatory agencies.

#### 7.0 DETERMINATION OF CREDITS AND CREDIT RELEASE SCHEDULE

The Department of Army Section 404 permit for the NCGTP (Action ID No. SAW-1992-02851), issued on October 21, 1998, authorized impacts to approximately 871 acres of jurisdictional wetlands. Condition 7 of this permit required the NCGTP to implement the Compensatory Mitigation Plan found in Appendix K of the FEIS to offset these impacts. Thus, the three NCGTP Mitigation Sites, in total, were authorized as compensatory mitigation for 871 acres of wetland impacts associated with this facility. The distribution of credits between Riparian and Non-riparian wetland types is shown in Table 1.

Table 1. Wetland Mitigation Quantities Generated at the NCGTP Mitigation Sites

Mitigation Site Component	Impact Credits
Riparian Wetlands	106.40
Non-riparian Wetlands	764.50
Total	870.90

All wetland mitigation credits have been released and are presently authorized for debiting. To date, approximately 217 acres of wetlands have been debited from the NCGTP Mitigation Sites for various permitted activities prior to inclusion in the NCDOT

UMBI. Exact credit amounts debited and remaining wetland credits are provided in Appendix B.

#### 8.0 GEOGRAPHIC SERVICE AREA

All wetland mitigation credits from the three NCGTP Mitigation Sites are reserved exclusively for permitted impacts associated with the NCGTP airport and facilities, as documented in the Department of Army Section 404 permit (Action ID No. SAW-1992-02851).

#### 9.0 MAINTENANCE PLAN

The NCGTP Mitigation Sites will be held by NCGTP Authority and placed on the NCDOT Environmental Analysis Unit mitigation geodatabase. If an appropriate third party recipient is identified in the future, then transfer of the property to such a recipient will include conservation easement covenants to protect the natural features of the site in perpetuity.

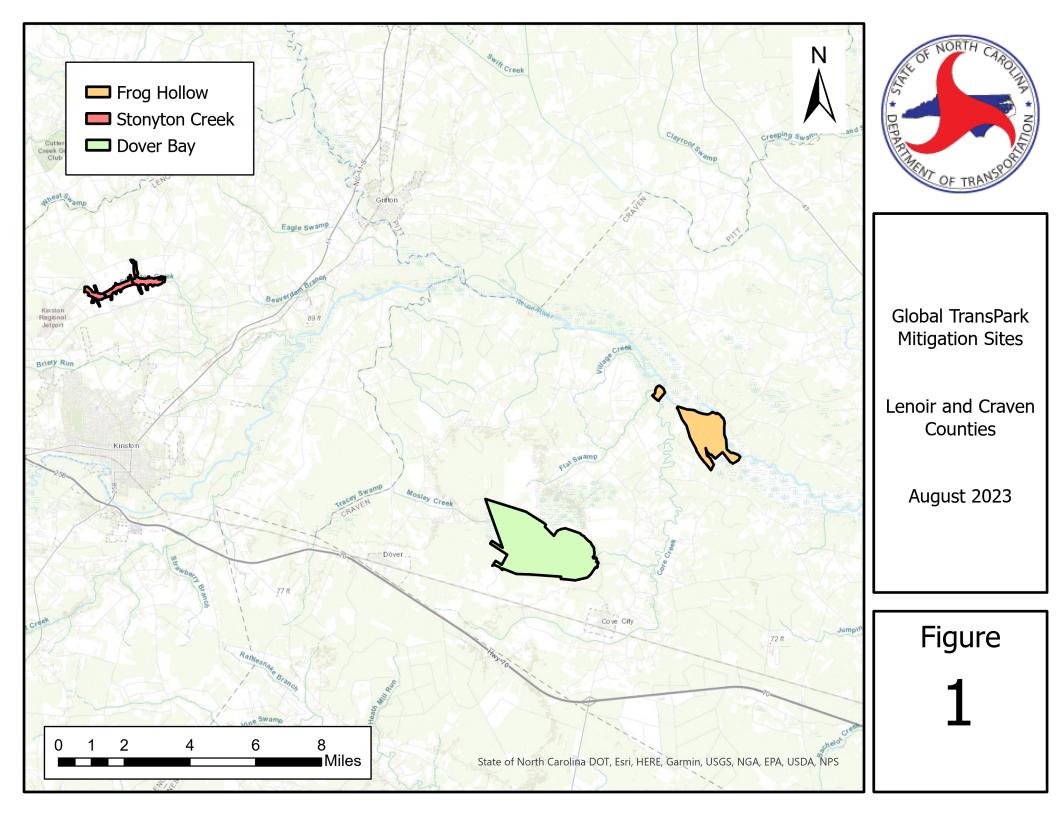
### 10.0 LONG TERM ADAPTIVE MANAGEMENT PLAN

The NCGTP Mitigation Sites will be managed by the NCGTP Authority according to the Compensatory Mitigation Plan and UMBI. In the event that unforeseen issues arise that affect the management of the site, any remediation will be addressed by NCGTP Authority in coordination with the Interagency Review Team (IRT).

#### 11.0 FINANCIAL ASSURANCES

The NCGTP Mitigation Sites are proposed to be managed as part of an umbrella mitigation bank, which will have its own distinct cost center number within the NCGTP budgeting and financial tracking system. Therefore, all accounting for revenues, contract encumbrances, fund transfers, and expenses, will be performed and reported independent from other capital budget or operating budget accounting.

# APPENDIX A Figures



# APPENDIX B Debit Ledger

Activity	Permit Area	Date of Application	Approval Date	Riparian Impact Total (Acres)	Non-Riparian Impact Total (Acres)	Delineation Map #	Wetland ID #
Runway Extension	Α	05/31/91	10/21/98	22.700	0.000	5	F8A
ALSF	Α	05/31/91	10/21/98	0.000	12.400	2	F20
Crescent Road	В	02/13/01		0.000	5.910	1,2,4,5,8\$,9	F23, F25F, F26; F31
Hardstand	В	07/30/99	01/04/00	0.000	8.600	2	F15
Cargo Bldg & Access Road	В	05/21/01	07/10/01	0.000	0.420	2,3	F15
Utility Line Construction	В	09/18/01	11/07/01	0.000	2.170	2,4	F14, F15
Stonyton Creek Stream Restoration	В	08/21/02	10/23/02	0.000	0.000	10	F39
Runway Clearing & Grubbing	В	09/04/02	10/23/02	0.000	13.500	4,6	F5, F16
John Mewborne Rd. Relocation	В	05/15/03		0.000	3.000	4	F16
Glideslope Grading & ALSF Rd	В	10/15/03	01/15/04	0.000	53.000	1,2	F19, F20, F25
Access Taxiway	В	06/17/04	07/30/04	0.240	0.000	5	F10A
Institute Rd	В	02/28/05	06/17/05	0.000	0.003	6	F5
Institute Rd*	В	02/28/05	06/17/05	0.000	4.917	6	F6
Spirit AeroSystems - Roads	В	9/16/2008; 3/12/2009	11/17/2008; 6/1/2009	0.040	0.000	5	F12
Railroad Spur	IND/B	06/30/09; 03/25/2014	02/17/10; 3/29/2014	1.230	5.980	4,5	F22, F23
Airport Security Fence	В	08/12/09	10/20/09	0.000	1.400	6	F5
J. Mewborne & Rouse Rd Culvert	В	1/19/2010; 12/5/2011	3/31/2010; 12/5/2011	0.153	0.000	5	F12
Cargo Apron/Access Rd	В	01/19/10	03/31/10	0.227	0.000	5	F10A
Site 3 - AWOS	В	03/23/23	04/17/23	0.000	26.400	2	F15
Site 5 - Runway & Fence Line Clearing	В	03/23/23	04/17/23	0.000	9.900	3	F14
Site 7 - Runway & Fence Line Clearing	В	03/23/23	04/17/23	0.000	24.400	6	F4, F5
Site 4 - Clearing Along Fence Line & Adjacent to Runway	Α	03/24/23	04/18/23	0.000	7.500	3	F14
Site 6 - Clearing Along Fence Line & Adjacent to Runway	Α	04/02/23	06/13/23	0.000	12.800	3	F11
TOTAL				24.590	192.300		

(Information updated through July 2023)

\*Delayed debit (authorized in 2005, debited in 2023)

IMPACT SUMMARY (Acres)	Riparian*	Non-Riparian*	Total
Total Impacts Permitted	106.400	764.500	870.9
Impacts To Date	24.590	192.300	216.89
Balance: Impacts Remaining	81.810	572.200	654.010

<sup>\*</sup>These assets are strictly for future use to offset aquatic impacts on the original NCGTP Site