

State of North Carolina  
Department of Environment,  
Health and Natural Resources  
Division of Environmental Management

James B. Hunt, Jr., Governor  
Jonathan B. Howes, Secretary  
A. Preston Howard, Jr., P.E., Director



June 13, 1995

Ms. Robin Little  
NCDOT  
Division of Highways  
Planning and Environmental Unit  
P.O. Box 25201  
Raleigh, NC 27611-5201

Dear Ms. Little:

**SUBJECT: Seven Springs Mitigation Bank  
Wayne County**

I have reviewed the subject mitigation proposal which is being proposed as compensatory mitigation for the loss of 4.27 acres of swamp hardwood and bottomland hardwood wetlands adjacent to the Neuse River associated with the construction of TIP # R-2422 in Wayne County. Based on the review of this proposal dated May 1, 1995 and the site visit conducted on May 4, 1995 the following comments concerning this proposal are offered:

- The document indicates that the mitigation is "in-kind", however, based on the information contained in this proposal it appears that this will be "out-of-kind" mitigation. This determination is based on the differences in frequency and duration of flooding and sources of water between the Neuse River wetlands and the mitigation site. The document indicates that the primary source of water for the Neuse River wetlands is overbank flooding whereas the source of hydrology for the mitigation site is primarily precipitation and groundwater.
- The document states that the present hydrology of the site meets jurisdictional criteria, i.e. saturation within twelve inches on soil surface for fourteen consecutive days during the growing season. The Corps of Engineers-Wilmington District guidelines for bottomland hardwoods specifies that the soil should be "saturated within 12 inches of the surface, ponded, or flooded at least 12.5% of the growing season.." In addition, the success criteria described on page 40 of this document states that "the hydrological parameters will overlap those of the reference site greater than 80% of the time after five years." Based on the submitted data and observations during the site visit it is unlikely that the mitigation site will meet the success criteria or the COE guidelines without plugging and/or filling the existing drainage ditches on the site. Therefore it is recommended that these ditches be plugged at a minimum of two locations as discussed during the site visit.
- It was apparent during the site visit that the access road has altered the movement of surface water across the mitigation site. If this road is to remain in place provisions may be needed to facilitate the movement of surface water from the eastern to the western portion of the site.

- Appendix IV states that the soils of the mitigation site are Torhunta. This was also stated during the site visit. The DRAINMOD calculations used Tomotley soils. The effect of using Tomotley and Torhunta soils in these calculations must be clarified.
- The number of monitoring stations is not specified in the proposal. The COE guidelines specify a minimum of one 0.05 acres sample plot/2 acres for sites greater than 10 acres in size.
- What is the total acreage of this site? The document states 25 acres on page 7 and elsewhere, 26.69 acres in Appendix IV, and 23 acres in Appendix V. Specify the number of acres of the entire site that will be used as mitigation, the number of acres that have been planted, and the number of acres that have been allowed to naturally regenerate.
- The details concerning the final disposition and long term management of this site must be completed prior to accepting this proposal as compensatory mitigation for TIP # R-2422.
- These comments should not be interpreted as an endorsement of the Conservation Easement or the Mitigation Banking Agreement as proposed in Appendices VII and VIII, respectively.
- Although this proposal is for "out-of-kind" compensatory mitigation, I will recommend to Mr. John Dorney, by copy of this letter, that this proposal be accepted as compensatory mitigation for the loss of 4.72 acres of wetlands associated with the construction of TIP # R-2422 upon receipt of a revised proposal addressing the concerns outlined in this letter.

Thank you for the opportunity to provide comments concerning this proposal. If you have any questions concerning these comments I can be reached at 919-733-0026.

Sincerely,



Ron Ferrell

cc: John Dorney  
Doug Frederick, Triangle Wetland Consultants  
Mike Bell, COE-Washington Field Office