



STATE OF NORTH CAROLINA
DEPARTMENT OF TRANSPORTATION

JOSH STEIN
GOVERNOR

DANIEL H. JOHNSON
SECRETARY

3/19/2026

U. S. Army Corps of Engineers
Water Resources Development Act (WRDA)
Transportation Permitting Branch

NC Division of Water Resources
Transportation Permitting Branch

ATTN: NCDOT Coordinator NCDOT Coordinator

Subject: **Reverification of Regional General Permit 31 & 401 Water Quality Certification for the widening of Route NC 24/27 from NC 740 in Albemarle, Stanly County to the Troy Bypass in Montgomery County, Divisions 8 & 10. TIPS R-2530B, B-4974, and R-2527, WBS: 35572.1.1.**

Dear NCDOT Coordinators:

The North Carolina Department of Transportation (NCDOT) hereby requests reverification of the impacts to potential Waters of the United States for the above referenced project that were previously authorized under an expiring Regional General Permit (RGP) and/or Water Quality Certification (WQC).

Previous Authorization Information

USACE Action ID	SAW-2008-02315	NCDWR Project No.	20181416
RGP No.	31	General Certification No.	4135
Date Issued	November 13, 2024	Date Issued	November 4, 2024

The previous permit application and authorization can be found here:
[R-2530B B-4974 R-2527 Stanly Montgomery NC 24-27](#)

Lead Federal Agency:

FHWA USACE

Project Status:

Pre-Let Under Construction

Reverifications Requested:

RGP 31 RGP 50 Individual 401 WQC GC 7679 For the Record Only

Supporting Documentation of Previous Permitting Decision

Topic	Notes / Changes
Permit Drawings	No Change
Impact Summary	No Change
Mitigation	No Change
Endangered Species Act	Change (See table below)
Archaeology	No Change
Historic Architecture and Landscapes	No Change
Tribal Coordination	No Tribes Added

Endangered Species Act

Protected Species listed from IPaC¹ as of the date of this request:

Common Name	Habitat Present	Survey Dates	Biological Conclusion	FWS Concurrence Remarks
Tricolored Bat P ²	Yes	n/a	MA-LAA ³	n/a
Schweinitz's Sunflower	Yes	09/25/2025	No Effect	n/a
Monarch Butterfly P ⁴	n/a	n/a	Not Required	n/a
Red-cockaded Woodpecker	Yes	02/22-25/2026	No Effect	n/a

1 IPaC – Information for Planning and Consultation (US Fish and Wildlife Service)

2 P = Proposed

3 MA-LAA = May Affect, Likely to Adversely Affect (under Eastern Bat PBO/PCO)

4 Monarch butterfly was proposed for federal listing under the Endangered Species Act (ESA) in December 2024. As of December 2025 the final decision has been delayed, and the status has been moved to "long-term action," meaning no final ruling is expected for at least another year. No regulatory protections will take effect until the listing is finalized. Until that time, proposed species do not receive formal ESA protections.

The red-cockaded woodpecker was not previously in range for this project, but the range in IPaC for this species expanded in late 2025. The 2026 survey is attached.

If you have any questions or need additional information, please contact Erin Cheely at ekcheely@ncdot.gov or (919)707-6108.

Sincerely,



Erin K. Cheely

ECAP Western Team Lead

Project Submittal Interim Form



Updated March 16, 2026

*Please note: fields marked with a red asterisk * below are required. You will not be able to submit the form until all mandatory questions are answered.*

Project Type: *

- For the Record Only (Courtesy Copy)
- Modification/New Project with Existing ID
- Other Agency Comments
- Re-Issuance/Renewal Request
- New Project
- More Information Response
- Pre-Application Submittal
- Stream or Buffer Appeal

Is this application for a project associated with emergency response/repairs from Hurricane Helene impacts to your project or property? *

- Yes
- No

Submittal Type: *

Individual

Project Contact Information

Name:

Erin Cheely

Who is submitting the information?

Email Address: *

ekcheely@ncdot.gov

Project Information

Existing ID #: *

20181416

20170001 (no dashes)

Existing Version: *

4

1

Project Name: *

R-2530B B-4974 R-2527 - widening of Route NC 24/27 from NC 740 in Albemarle, Stanly County to the Troy Bypass in Montgomery County

Is this a public transportation project? *

- Yes
- No

Is this a DOT project? *

- Yes
- No

Is the project located within a NC DCM Area of Environmental Concern (AEC)? *

- Yes
- No
- Unknown

Does this project involve maintenance dredging funded by the Shallow Draft Navigation Channel Dredging and Aquatic Weed Fund, electric generation projects located at an existing or former electric generating facility, or involve the distribution or transmission of energy or fuel, including natural gas, diesel, petroleum, or electricity? *

Yes No

Is this project connected with ARPA funding? *

Yes No

Is this application being filed jointly with another party involved with this project? *

Yes No

TIP#:

R-2530B B-4974 R-2527

WBS#:

35572.1.1

(Applies to DOT projects only)

County (ies) *

Stanly

Montgomery

Please upload all files that need to be submitted.

[Click the upload button or drag and drop files here to attach document](#)

R-2530B B-4974 R-2527 2026-03-19 Renewal Request.pdf

5.11MB

Only pdf or kmz files are accepted.

Describe the attachments or add comments:

This is a request for an RGP 31 Renewal for R-2530B B-4974 R-2527.

(This is a phased project. The R-2527 section is the portion of this project not yet completed.)

*

By checking the box and signing box below, I certify that:

- I, the project proponent, hereby certifies that all information contained herein is true, accurate, and complete to the best of my knowledge and belief.
- I, the project proponent, hereby requests that the certifying authority review and take action on this CWA 401 certification request within the applicable reasonable period of time.
- I agree that submission of this online form is a "transaction" subject to Chapter 66, Article 40 of the NC General Statutes (the "Uniform Electronic Transactions Act");
- I agree to conduct this transaction by electronic means pursuant to Chapter 66, Article 40 of the NC General Statutes (the "Uniform Electronic Transactions Act");
- I understand that an electronic signature has the same legal effect and can be enforced in the same way as a written signature; AND
- I intend to electronically sign and submit the online form.

Signature: *



Submittal Date:

3/19/2026

Red-Cockaded Woodpecker Survey Report

Improvements to NC 24/27 From NC 73
To The Troy Bypass
Montgomery County, North Carolina

TIP # R-2527
WBS Element # 35572.1.1

Prepared For:



NC Department of Transportation
Raleigh, North Carolina

Contact Person:

Tom Fox
Biological Surveys Group
North Carolina Department of Transportation
trfox2@ncdot.gov
1598 Mail Service Center
Raleigh, NC 27699-1598

March 17, 2026

Prepared by:



Engineers | Construction Managers | Planners | Scientists

8601 Six Forks Road, Forum 1 Suite 700
Raleigh, NC 27615

Contact Person:

Neil Medlin
Project Delivery Leader, Natural Resources
nmedlin@rkk.com
919-878-9560

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Figure 3: Forest Stand Map

Appendix B. Qualifications of Contributors

1.0 Introduction

The North Carolina Department of Transportation (NCDOT) proposes to widen NC 24/27 from NC 73 to the Troy Bypass in Montgomery County (Appendix A, Figure 1). As of March 4, 2026, the U.S. Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) webpage listed Red-cockaded Woodpecker (*Dryobates borealis* (Threatened)) as a protected species under the Endangered Species Act (ESA) that potentially may be affected by activities in the project location. The IPaC webpage indicated that there are no critical habitats that overlap with the project location.

A review of the NC Natural Heritage Program (NCNHP) records was conducted by NCDOT staff prior to the start of fieldwork and another by RK&K staff prior to the writing of this report. The reviews indicated that no element occurrences (EOs) existed within the project study area with the nearest EO (EO number 7479) being historical and located approximately 2.13 miles south of the project.

2.0 Red-Cockaded Woodpecker: Species and Habitat Description

The Red-cockaded Woodpecker (RCW) is a small black and white woodpecker with horizontal bars on its back, spotted flanks and a white belly. The cap and chin stripe are black and the male has a small red spot on each side of the black cap. These red spots are typically difficult to see (USFWS 2003).

RCWs are endemic to the southeastern United States where they were historically common in mature, fire-maintained pine forests. Ideal nesting habitat for RCWs includes open, mature southern pine forests dominated by longleaf (*Pinus palustris*), loblolly (*P. taeda*), pond (*P. serotina*), slash (*P. elliotti*) or other southern pine species greater than 60 years old with little or no mid-or understory development. Pine flatwoods and pine-dominated savannas, which have been maintained by frequent fires, serve as ideal nesting and foraging habitat for RCWs. Potential foraging habitat is generally defined as open pine or pine/hardwoods stands 30 years old or older. Much of the species' habitat range wide has been destroyed by logging, fire suppression, and conversion of forestlands for agricultural and other uses (USFWS 2003).

3.0 Methods

NCDOT staff conducted a screening site visit on February 20, 2026, to identify foraging habitat for RCW within the tree cutting boundaries for the proposed project. Potential foraging habitat was defined as stands dominated by pines 30 years old or greater or having a diameter at breast height (DBH) of 10 inches or greater. Where such trees were located within the tree cutting boundaries, a 0.5-mile buffer was established in which to search for potential nesting habitat and nest cavity trees (Figures 2-1 through 2-4). Potential nesting habitat was defined as pine and pine-hardwood stands equal to or greater than 60 years old or younger stands with remnant pines equal to or greater than 60 years old.

Areas within the 0.5-mile buffers were further evaluated by RK&K staff using time-labeled aerial imagery with Google Earth Pro. This process allowed the elimination of blocks of pines

younger than 30 years old as foraging habitat so as to increase search efficiency during the field surveys. Some aerial imagery dated as far back as 1985; however, the quality of much of the oldest imagery was not sufficient to place tree clearing date estimates on tree stands with confidence but still allowed the identification of the oldest stands within the 0.5-mile buffers (Figures 3-1 through 3-4). These oldest stands were visually searched by NCDOT and RK&K staff for trees estimated to be equal to or greater than 60 years old and these trees were then inspected for evidence of RCW activity. This portion of the of the field surveys was conducted February 22 – 25, 2026. In addition to searching for older potential nesting trees during the field surveys, younger stands of trees were randomly observed to confirm the results of the time lapse imagery review.

4.0 Results

Longleaf and loblolly pines estimated to be equal to or greater than 60 years old were sporadically observed within the oldest stands of trees (all were stands of pines/mixed hardwoods) within the 0.5-mile buffer search areas. These oldest stands of trees are shown as Nesting/Foraging Habitat on Figures 2-1 through 2-4. No active or inactive nest cavity trees currently or historically being used by RCWs were observed during the field surveys. Stands of pine trees estimated to be equal to or greater than 30 years old but less than the previously described oldest stands were considered to be RCW foraging habitat and are depicted as such on Figures 2-1 through 2-4.

The most common tree and vegetation species noted within the habitat types depicted in Figures 2-1 through 2-4 and the general tree stand ages depicted in Figures 3-1 through 3-4 are summarized in Table 1 below. Areas regarded as providing no habitat for RCW were typically those that had been clear cut within the last 30 years and subsequently replanted with pines (primarily loblolly) that were very dense, areas composed almost entirely of hardwoods, or a combination of young pines and hardwoods.

Table 1. Species Composition

Type	Nesting/Foraging Habitat	Foraging Habitat	No Habitat
Canopy species	Longleaf pine (<i>Pinus palustris</i>) Loblolly pine (<i>Pinus taeda</i>) Shortleaf pine (<i>Pinus echinata</i>)	Longleaf pine (<i>Pinus palustris</i>) Loblolly pine (<i>Pinus taeda</i>) Shortleaf pine (<i>Pinus echinata</i>)	Southern red oak (<i>Quercus falcata</i>) White oak (<i>Quercus alba</i>) Tuliptree (<i>Liriodendron tulipifera</i>)
Midstory species	Sweetgum (<i>Liquidambar styraciflua</i>) Sourwood (<i>Oxydendron arboreum</i>) Blackjack oak (<i>Quercus marilandica</i>)	Sweetgum (<i>Liquidambar styraciflua</i>) Longleaf pine (<i>Pinus palustris</i>) Loblolly pine (<i>Pinus taeda</i>)	Sweetgum (<i>Liquidambar styraciflua</i>) Red maple (<i>Acer rubrum</i>) Loblolly pine (<i>Pinus taeda</i>)
Understory species	Hickory (<i>Carya</i> spp.) Sunflower (<i>Helianthus</i> spp.) Little brown jug (<i>Hexastylis arifolia</i>)	Hickory (<i>Carya</i> spp.) Sawtooth blackberry (<i>Rubus argutus</i>) Smooth sumac (<i>Rhus glabra</i>)	Broomstraw (<i>Andropogon virginicus</i>)
Acreeage	894.17	1054.35	976.71

No RCW individuals were observed during any of the field survey days. Other woodpecker species that were noted were Pileated (*Dryocopus pileatus*), Yellow-bellied Sapsucker (*Sphyrapicus varius*), Northern Flicker (*Colaptes auratus*), Downy (*Dryobates pubescens*), Red-bellied (*Melanerpes carolinus*), and Red-headed (*Melanerpes erythrocephalus*).

Both suitable foraging and nesting habitat for RCW exist within 0.5 mile of the project corridor; however, no nest cavities were found during a ground survey of the area, therefore no foraging habitat analysis is required. In addition, there are no known RCW trees or clusters within 1.0 mile of the project study area. This project will have no effect on RCW.

Biological Conclusion for Red-cockaded Woodpecker: No Effect.

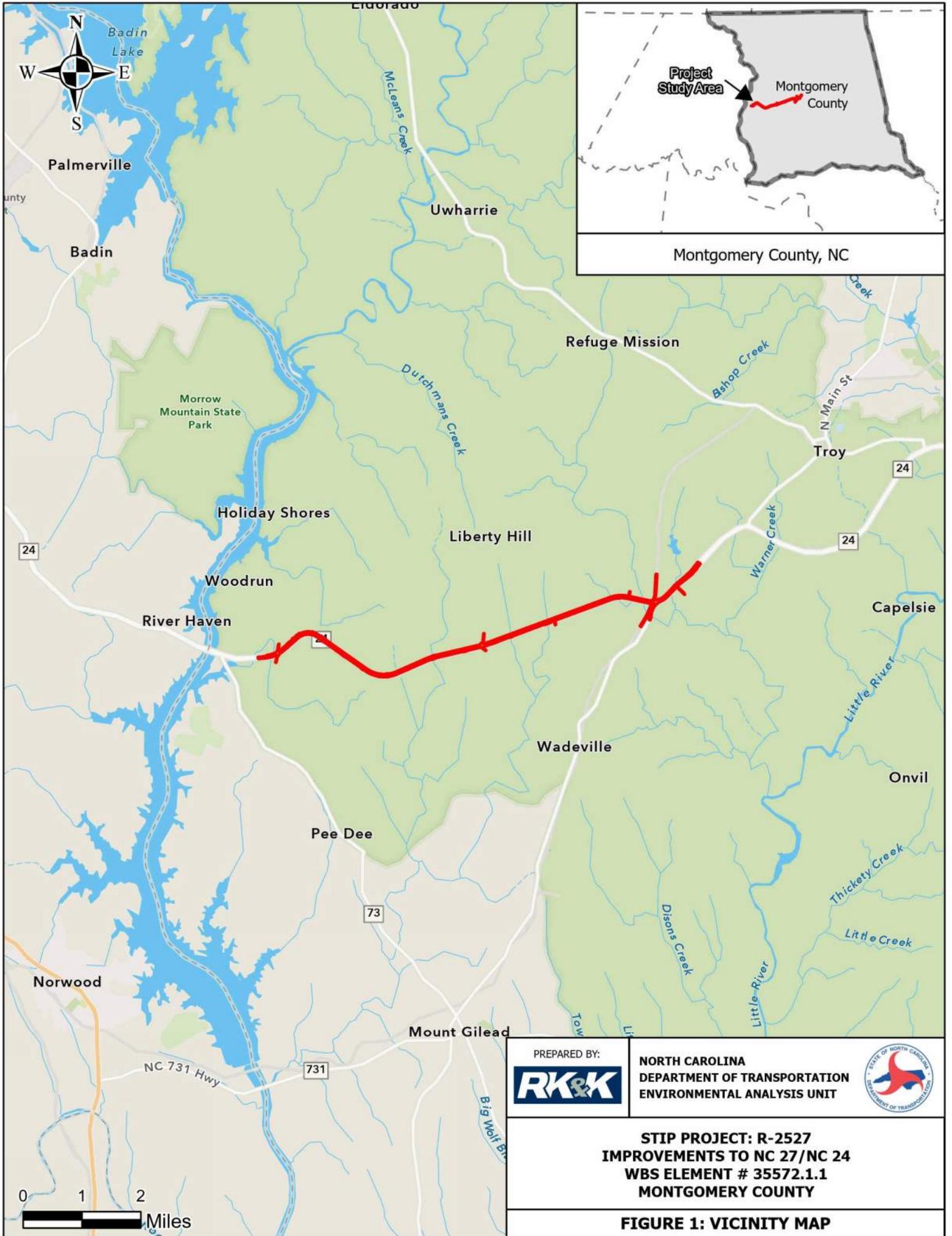
8.0 References

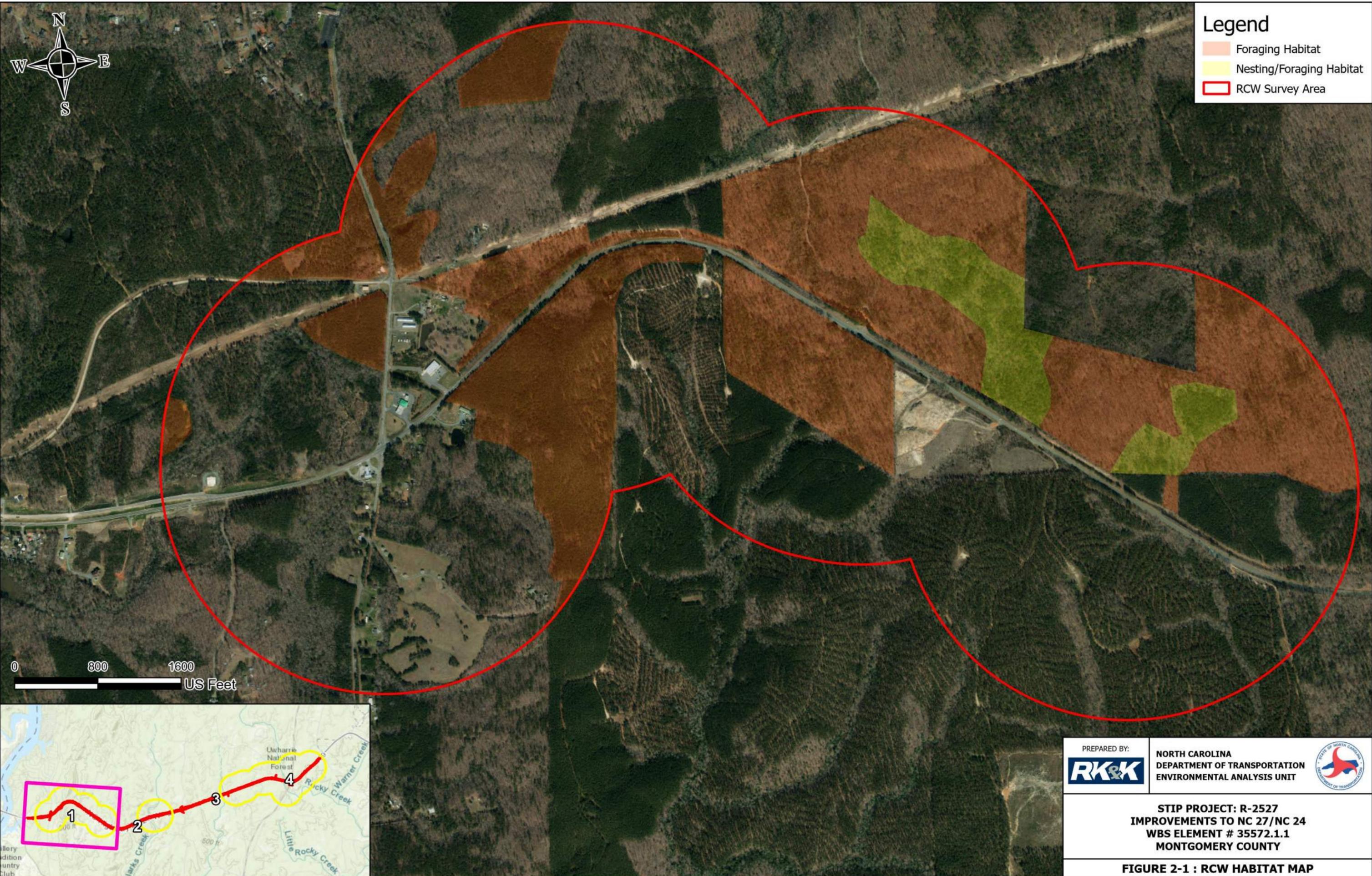
United States Fish and Wildlife Service. 2003. Red-cockaded woodpecker recovery plan: 2nd revision.

United States Fish and Wildlife Service. 2025. Information for Planning and Consultation (IPaC). Available: <https://ecos.fws.gov/ipac/>. (March 2026).

Appendix A

Figures

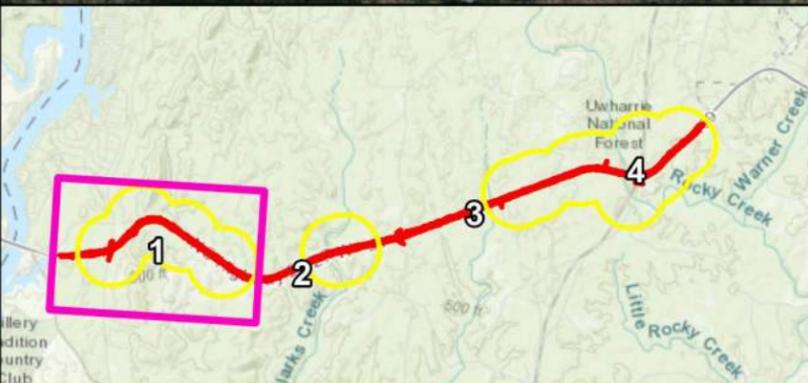




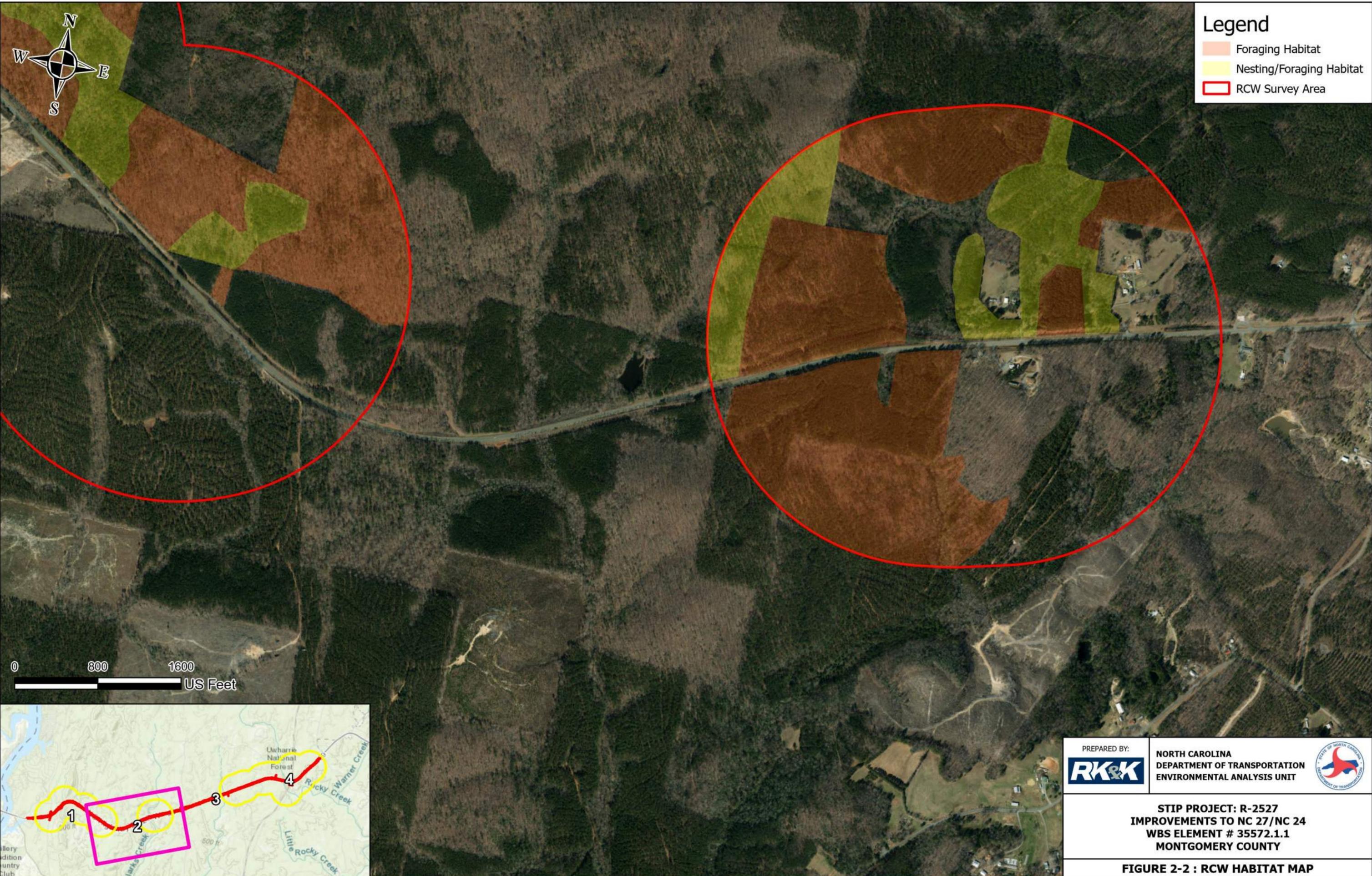
Legend

- Foraging Habitat
- Nesting/Foraging Habitat
- RCW Survey Area

0 800 1600
US Feet



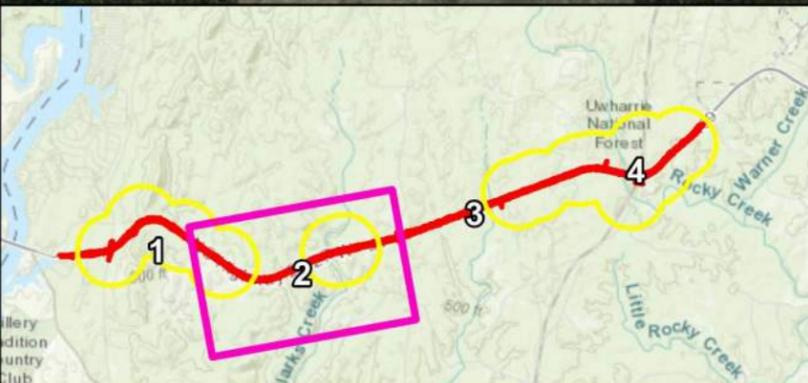
PREPARED BY: 	NORTH CAROLINA DEPARTMENT OF TRANSPORTATION ENVIRONMENTAL ANALYSIS UNIT
STIP PROJECT: R-2527 IMPROVEMENTS TO NC 27/NC 24 WBS ELEMENT # 35572.1.1 MONTGOMERY COUNTY	
FIGURE 2-1 : RCW HABITAT MAP	



Legend

- Foraging Habitat
- Nesting/Foraging Habitat
- RCW Survey Area

0 800 1600
US Feet

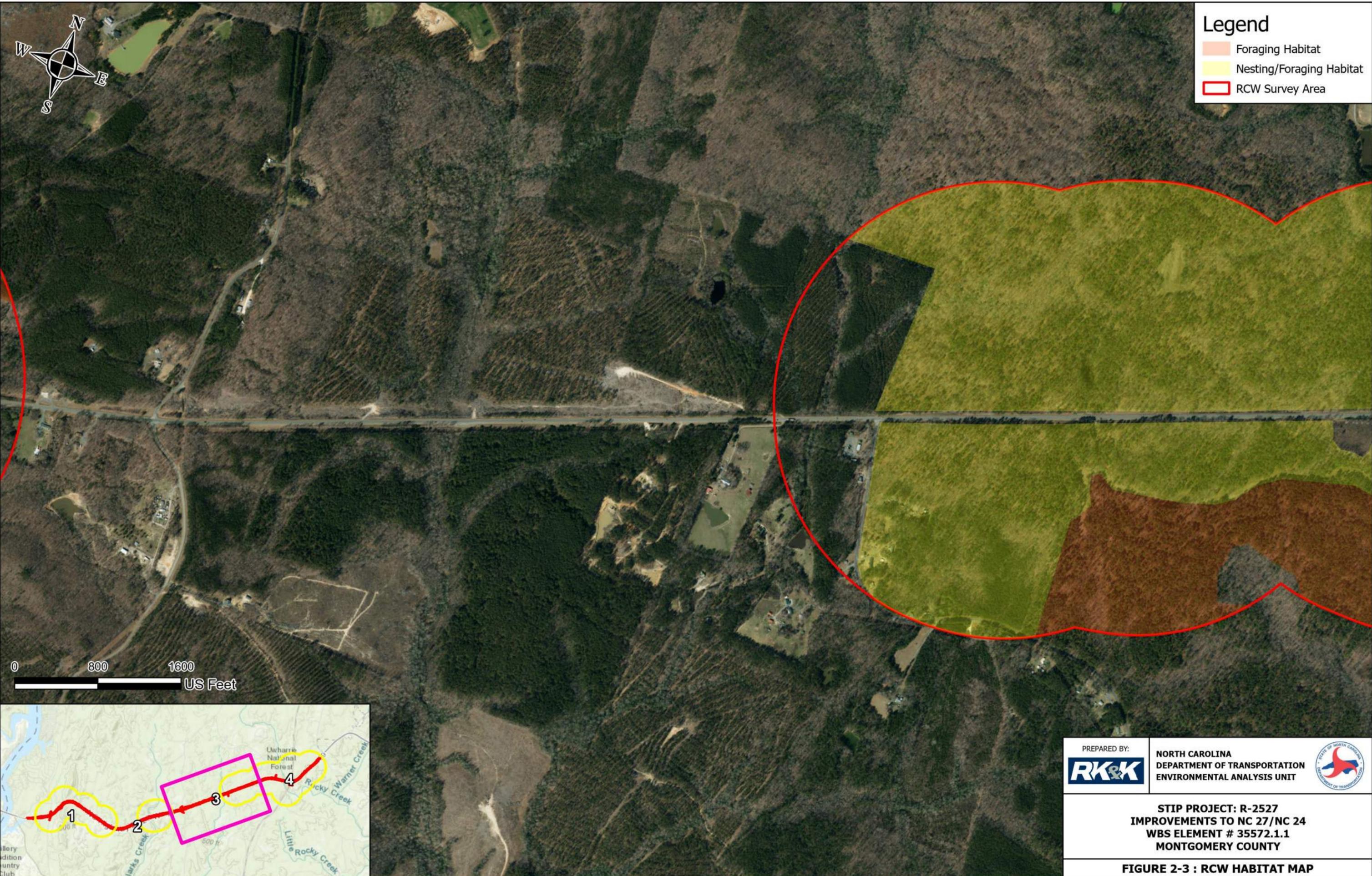


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FIGURE 2-2 : RCW HABITAT MAP	



Legend

- Foraging Habitat
- Nesting/Foraging Habitat
- RCW Survey Area

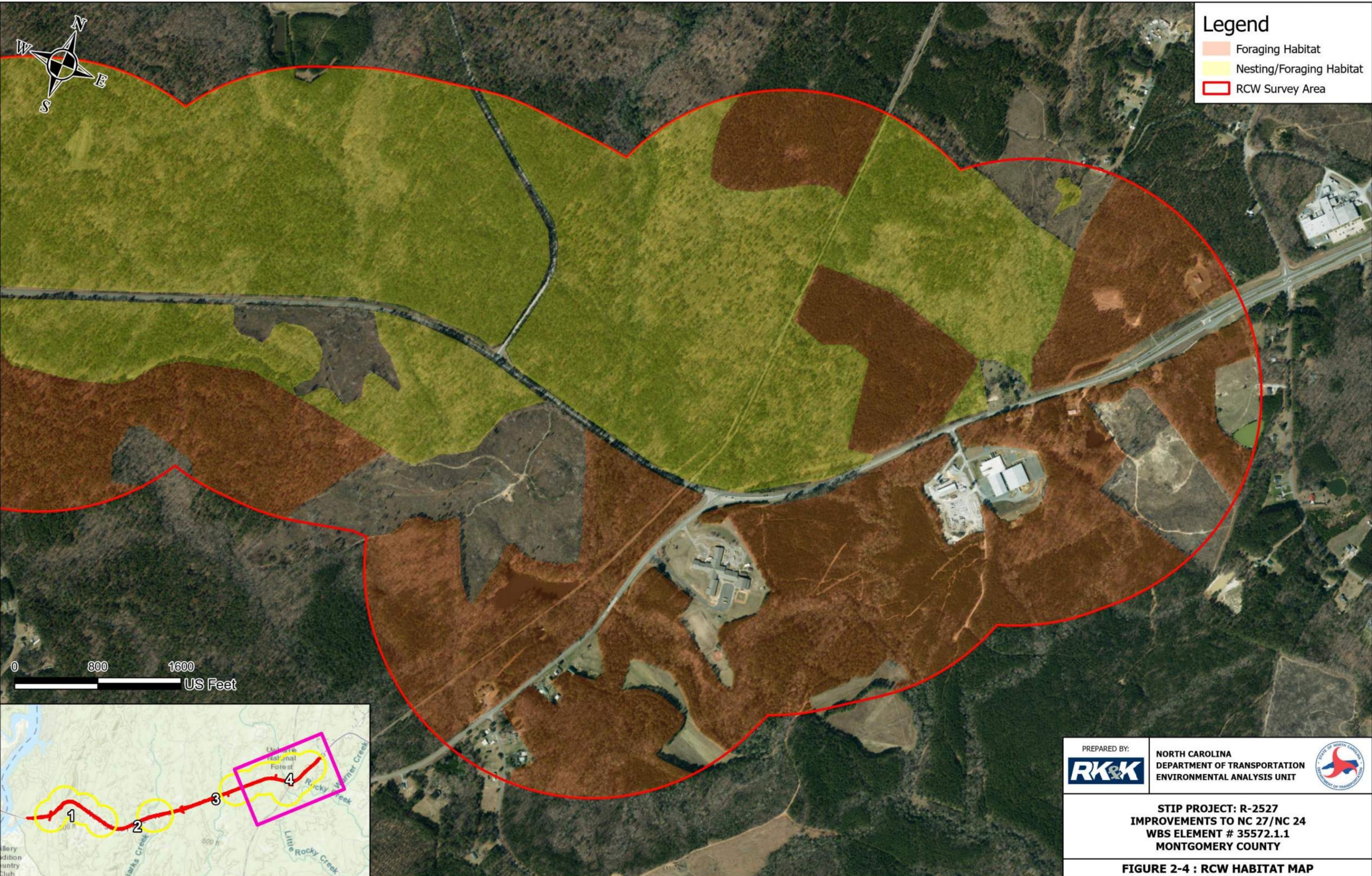


PREPARED BY: RK&K	NORTH CAROLINA DEPARTMENT OF TRANSPORTATION ENVIRONMENTAL ANALYSIS UNIT	
STIP PROJECT: R-2527 IMPROVEMENTS TO NC 27/NC 24 WBS ELEMENT # 35572.1.1 MONTGOMERY COUNTY		
FIGURE 2-3 : RCW HABITAT MAP		

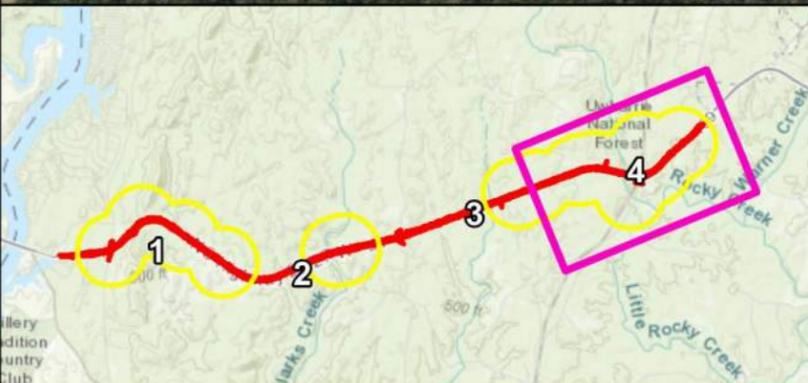


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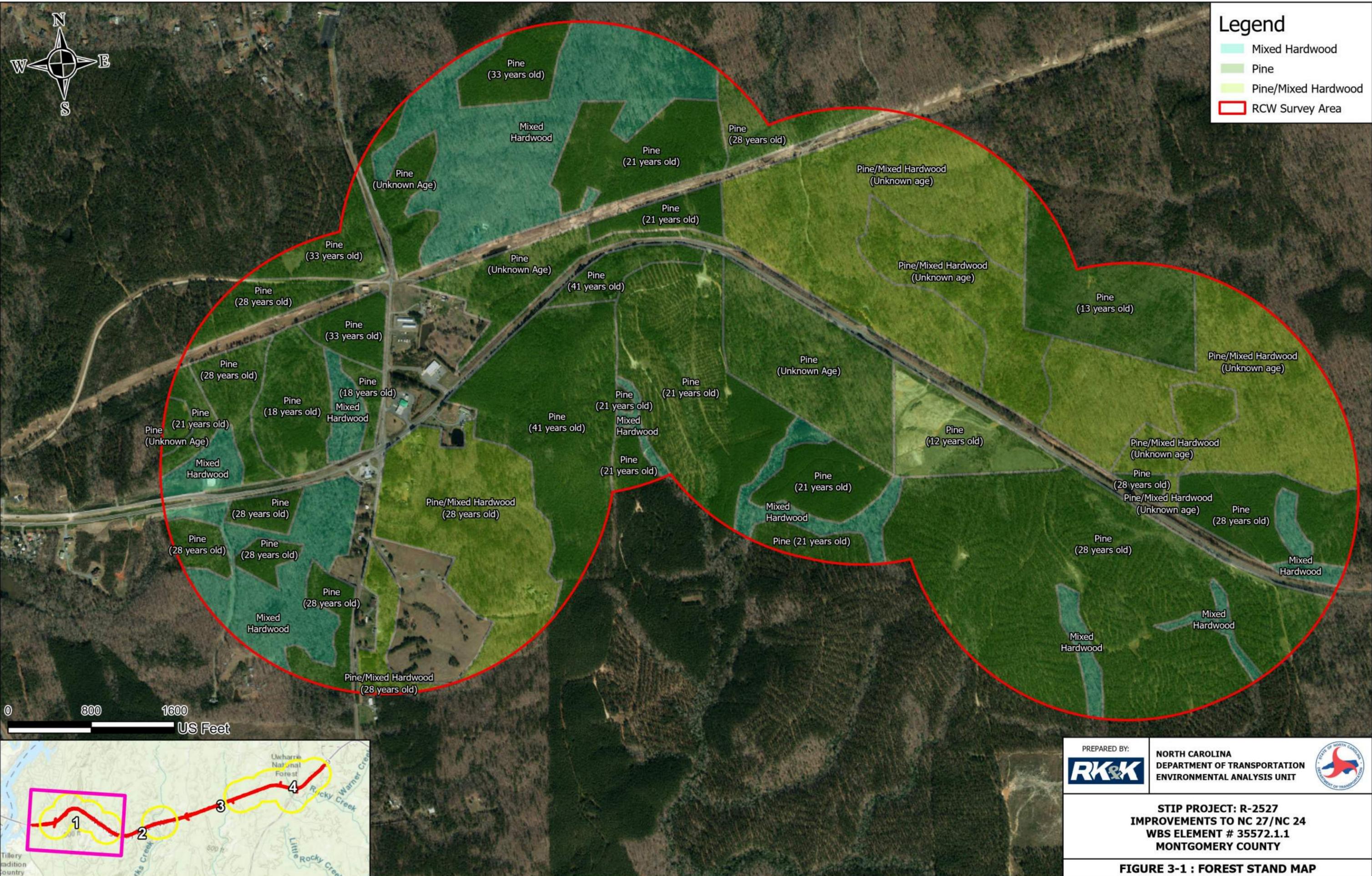
- Foraging Habitat
- Nesting/Foraging Habitat
- RCW Survey Area



0 800 1600 US Feet



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FIGURE 2-4 : RCW HABITAT MAP		



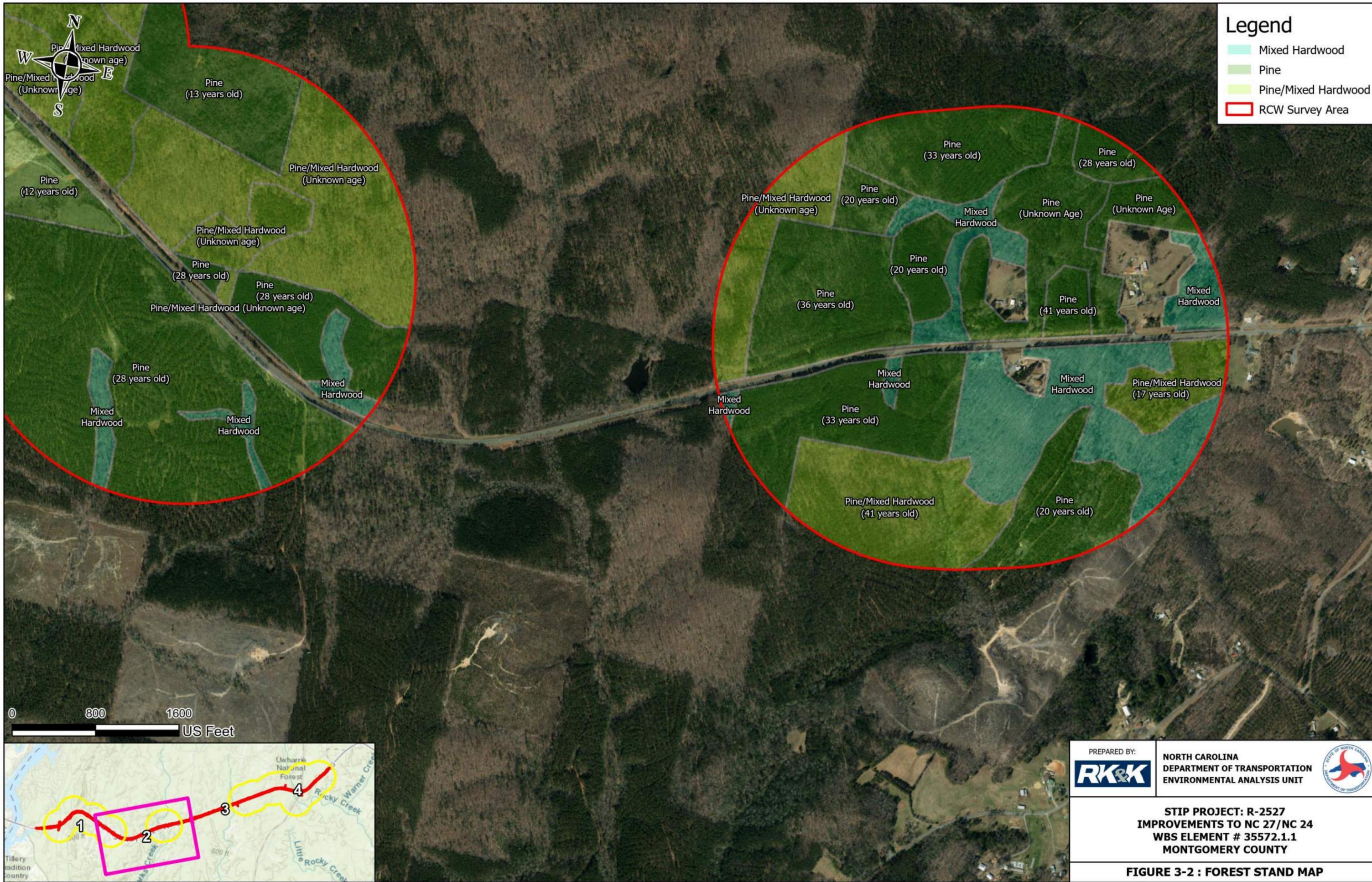
Legend

- Mixed Hardwood
- Pine
- Pine/Mixed Hardwood
- RCW Survey Area

0 800 1600
US Feet



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STIP PROJECT: R-2527 IMPROVEMENTS TO NC 27/NC 24 WBS ELEMENT # 35572.1.1 MONTGOMERY COUNTY	
FIGURE 3-1 : FOREST STAND MAP	



Legend

- Mixed Hardwood
- Pine
- Pine/Mixed Hardwood
- RCW Survey Area

0 800 1600
US Feet



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STIP PROJECT: R-2527 IMPROVEMENTS TO NC 27/NC 24 WBS ELEMENT # 35572.1.1 MONTGOMERY COUNTY	
FIGURE 3-2 : FOREST STAND MAP	



Legend

- Mixed Hardwood
- Pine
- Pine/Mixed Hardwood
- RCW Survey Area

Pine
(Unknown Age)

Mixed
Hardwood

Mixed
Hardwood

Pine
(28 years old)

Pine/Mixed Hardwood
(Unknown age)

Pine
(6 years old)

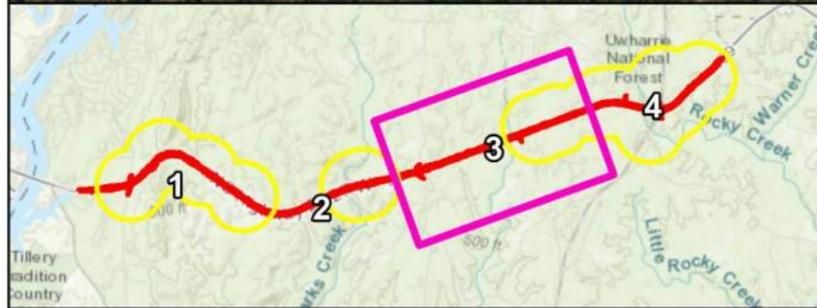
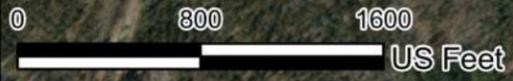
Pine
(28 years old)

Mixed
Hardwood

Pine
(Unknown Age)

Pine
(Unknown Age)

Mixed
Hardwood

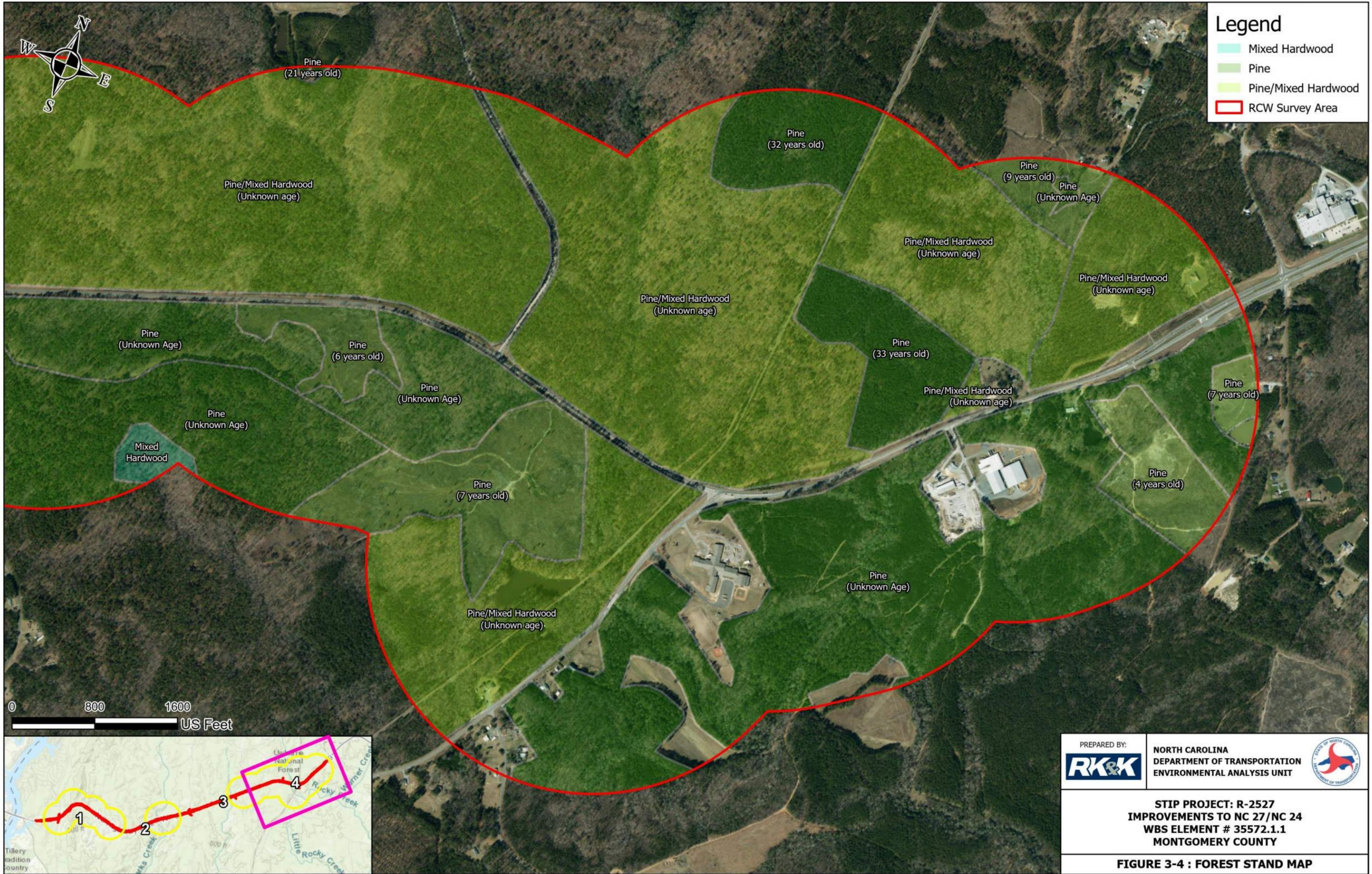


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STIP PROJECT: R-2527 IMPROVEMENTS TO NC 27/NC 24 WBS ELEMENT # 35572.1.1 MONTGOMERY COUNTY	
FIGURE 3-3 : FOREST STAND MAP	



Legend

- Mixed Hardwood
- Pine
- Pine/Mixed Hardwood
- RCW Survey Area



0 800 1600 US Feet



PREPARED BY: RK&K	NORTH CAROLINA DEPARTMENT OF TRANSPORTATION ENVIRONMENTAL ANALYSIS UNIT	
STIP PROJECT: R-2527 IMPROVEMENTS TO NC 27/NC 24 WBS ELEMENT # 35572.1.1 MONTGOMERY COUNTY		
FIGURE 3-4 : FOREST STAND MAP		

Appendix B

Qualifications of Contributors

Qualifications of Contributors

Investigator: Neil Medlin, RK&K
Education: M.A. Biology, Appalachian State University, 1986
B.S. Biology, Appalachian State University, 1984
Experience: Project Delivery Leader, RK&K, 2018-Present
Project Manager, RK&K, 2017-2018
Senior Environmental Scientist, RK&K, 2016-2017
Biological Surveys Group Leader, NCDOT, 2012-2016
Environmental Supervisor, NCDOT, 2004-2012
Environmental Specialist, NCDOT, 2002-2004
Environmental Biologist, NCDENR, 1990-2002
Environmental Biologist, FLDER, 1986-1990
Responsibilities: Field survey, reporting, QA/QC, Project Management

Investigator: Hal Bain, RK&K
Education: M.S. Coastal Ecology Track, UNC Wilmington, 1989
B.S. Biology, Campbell University, 1985
Experience: Senior Environmental Project Scientist, RK&K, 2009-Present
Natural Resources Team Leader, ARCADIS, 2003-2008
Biological Surveys Group Leader, NCDOT, 1995-2003
Senior Biologist, NCDOT, 1992-1995
Biology Teacher/Coach, Wake County Public Schools, 1989-1992
Responsibilities: Field survey

Investigator: Gordon Marsh, RK&K
Education: Master of Environmental Assessment, NC State University, 2019
B.S. Environmental Science, UNC Wilmington, 2017
Experience: Project Manager, RK&K, 2023-Present
Project Scientist, RK&K, 2022-2023
Associate Environmental Scientist, RK&K, 2017-2022
Responsibilities: Field survey, GIS mapping, reporting

Investigator: Nat Blackford, RK&K
Education: M.E.M. Coastal Environmental Management, Duke University, 2023
M.F. Forest Management, Duke University, 2023
Certificate in Applied GIS, University of Southern Maine, 2020
B.A. Environmental Studies, Middlebury College, 2016
Experience: Environmental Scientist, RK&K, 2024-Present
Responsibilities: Field survey, GIS mapping, reporting