

STATE OF NORTH CAROLINA DEPARTMENT OF TRANSPORTATION

JOSH STEIN
GOVERNOR

November 7, 2025

DANIEL H. JOHNSON
SECRETARY

U. S. Army Corps of Engineers
 Regulatory Field Office
 151 Patton Avenue, Room 208
 NC Division of Water Resources
 Transportation Permitting Branch
 2090 U.S. 70 Highway

Asheville, NC 28805 Swannanoa, NC 28778-8211

ATTN: Ms. Crystal Amschler, Ms. Amy Annino,
NCDOT Coordinator NCDOT Coordinator

Subject: 1) Section 404 Nationwide Permit 3/33 & 401 Individual Water Quality Certification

for the "Upper Section" of NC 9 (from "Station 37" to the Buncombe County Line).

2) Modification to Site 1 of the previously issued permits for the "Lower Section" (NC 9 from US 74A to Station 37).

3) Additional Information pursuant to questions from the September 5, 2025 project

"walk-thru"

Henderson County, Division 14, WBS 18314.1045061.

Reference: 404 Permit; Action ID: SAW-2025-00325, dated 8/8/2025.

401 Certification; Project No. 20250664, dated 8/4/2025.

Dear Madams:

The North Carolina Department of Transportation (NCDOT) provides the following supplemental information, provided to answer question and provide additional information after the September 5, 2025 "virtual walk-thru" for the above referenced project.

Please find Walkthrough Comments, questions and NCDOT responses noted below. Additionally, drawings have been revised as appropriate.

General

Amy Annino (DWR): Please include the dewatering detail(s) that will be used for the project. The detail(s) do not have to be site specific.

Response: The pump around operation detail for dewatering is included with the Erosion Control Plan Set. A pdf printout of the detail has been included with the supplemental packet for convenience.

Amy Annino (DWR): Please show the path of proposed stream channel along with the post-Helene stream channel or pre-Helene stream channel - differentiate by feature color or label.

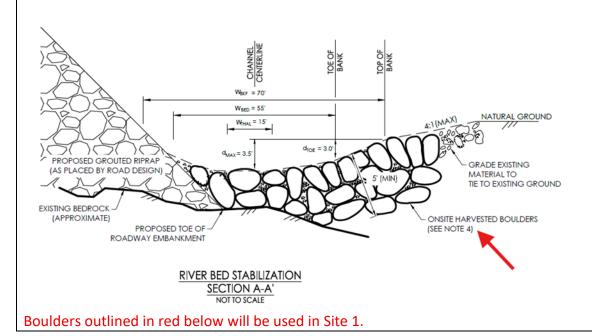
Response: Estimated pre-Helene stream channel has been added to the drawings along with the suspected location of existing pipes using pre-storm LiDAR from NC Spatial Data. A legend has been added to the drawings to indicate the line style and color of the pre-Helene stream channel and existing pipe crossings.

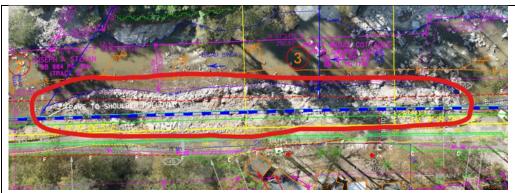
David McHenry (NC WRC): What is the proposed fill material shown in 1st screenshot along and across the river at site 1?

Response: All river material will consist of previously harvested river material which was deposited in upland areas and temporarily used to re-stabilize NC 9, on Sheet 4.

David McHenry (NC WRC): The application mentions the river bed is bedrock, but it also notes; All river material will consist of previously harvested river material which was deposited in upland areas and temporarily used to re-stabilize NC 9, on Sheet 4. Specifically, where is that material coming from? Is it the excavated road bed material in the attached picture (left side) where the single lane NC 9 has been (may still be)? I haven't been down there in a while so I'm not sure what other changes may have occurred down there in last 2-3 months.

Response: Here's an excerpt of the attached in-stream construction detail. Boulders will be harvested on-site along the river including using what's remaining of the temporary berm that was built right after the storm that allowed them to build the temporary gravel "road" right after the storm. Coincidently, the stream morphologists recommended that these boulders be removed because they were causing a high energy concentration that wasn't present in the river pre-Helene so they will be beneficially used to stabilize the river.





Note 4 will allow the contractor to use non-native boulders in the lower layer topped with the harvested layer if there are not enough harvested boulders.

NOTES:

- DIMENSIONS ARE APPROXIMATE AND MAY BE SUBJECT TO CHANGE BASED ON FILED CONDITIONS AND THE DIRECTION OF THE ENGINEER AND/OR THE CLIENT REPRESENTATIVE.
- CONSTRUCT RUN STRUCTURE BEGINNING AT THE DOWNSTREAM END AND MOVING IN THE UPSTREAM DIRECTION.
- PLACE BOULDERS SO THEY ARE TOUCHING AND ORIENTED WITH THEIR DOWNSTREAM END PITCHED UP INTO THE FLOW AS SHOWN.
- 4) NON-NATIVE CLASS VII AND LARGER RIP RAP AND BOULDERS CAN BE USED IN NON-EXPOSED LOWER LAYERS OF THE IN-STREAM CONSTRUCTION WHEN A SUFFICIENT AMOUNT OF ONSITE HARVESTED BOULDERS ARE NOT AVAILABLE.

Crystal Amschler (USACE): How is the stream modification tie-in working?

Response: As discussed in the meeting, the tie-in was left vague since the River Morphologist Engineer would be on site to direct how to tie-in to the existing channel.

Scott Jones (USACE): Where is the debris near the stream mod from?

Response: The debris near the stream modification is all-natural consisting of rocks, trees, and other similar material.

Amy Annino (DWR): No comments on Site 1 from DWR.

David McHenry (NC WRC): Part of my confusion was I didn't notice any rock berm before. I still didn't notice it earlier this week when they were constructing what looks like a construction access and/or embankment base (see photos).

Response: We have been coordinating with Grant Ginn, a River Restoration Engineer hired by NCDOT, to oversee repairs of riverbeds like these damaged by Helene. He was in Bat Cave in September 2025, coordinating with Mike Patton, resident engineer for the projects in the area, and Wright Brothers who is constructing the first 1/4 mile of the project along the river. During his visit, he scouted the river and reported that he believes that there will be enough native boulders to do the in-stream construction. Grant worked directly with our engineers at Stantec to develop the In-Stream construction detail to move the thalweg over at Site 1.

continued



David McHenry (NC WRC): This week they were bringing in rock, I think, but maybe they had already pulled the berm under the embankment (?).

Response: Wright Brothers has a quarry nearby and the roadway embankment came from there.

David McHenry (NC WRC): I did request in my comments leaving some scattered large rock along that wall (aka embankment). That would provide flow disruption and offer some aquatic habitat heterogeneity and channel roughness (at least for awhile), which are particularly needed when hardened walls (in this case grouted rock) are constructed to line a river bank. I still recommend that, and that would be exposed boulders rather than rock that is fully embedded in the "smooth-ish" channel base (presumably also not grouted) as shown in the cross section.

Response: Cory Anderson and Chris Plummer, two stream engineers from Stantec, will be in the Broad River once the permit is approved, directing Wright Brothers to construct the stream realignment alongside Grant Ginn. They will be able to direct Wright Brothers to leave/place boulders along the grouted embankment as requested.

David McHenry (NC WRC): Per note 4, I hope they can obtain enough native alluvial material to top this channel with, much of which is under the road. That would be good if they could recoup some of that as the top-dressing.

Response: As noted above, Grant Ginn believes that there is enough.

Site 2

No comments.

Site 3

No comments.

Site 4

No comments.

Amy Annino (DWR): Please identify and differentiate the LF of proposed impact types (ex. rip rap fill, additional culvert pipe, channel relocation) and include the total LF for each in the impact table. Please differentiate temporary impact types (ex. rip rap fill, culvert pipe, dewatering) and include the total LF for each in the impact table. Please indicate approximate LF of pre-Helene culvert pipe and proposed LF of culvert pipe. Please include a detail showing the stream channel dimensions at the culvert outlet and how this stream will connect to the off-site 24" CMP.

Response: See detail 35. For the quantities, they have been broken out for both the inlet and outlet ends. Changed the verbiage from "Channel Relocation" to "Channel Replacement" since the proposed configuration is establishing the pre-storm streamline as best as possible considering the current existing conditions. The pre-Helene existing LF of the existing culvert has been added as a line item in the summary table. Please note that this estimated value is based solely on LiDAR obtained from NC Spatial Data. We do not have inlet/outlet locations for pipes, therefore, this value is speculative.

Crystal Amschler (USACE) & Amy Annino (DWR): Add outlet channel detail to maintain 2' width.

Response: See detail 35. A note has been added to in the detail to key-in the supplemental rip rap to maintain the existing stream bed.

Revise clip boundary on Section 329/330 sheets to show full sheet instead of only Section 329.

Response: Clip boundary revised to show full sheet.

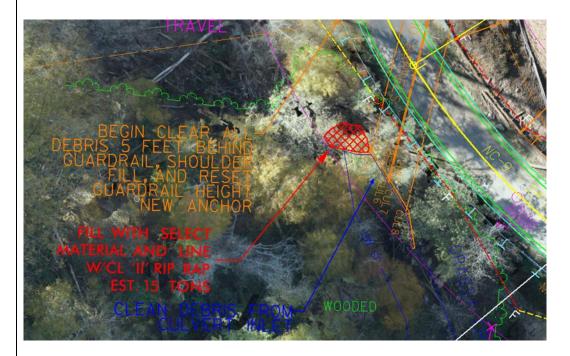
Site 6

Amy Annino (DWR): Please identify and differentiate the LF of proposed impact types (ex. rip rap fill, additional culvert pipe, channel relocation) and include the total LF for each in the impact table. Please differentiate temporary impact types (ex. rip rap fill, culvert pipe, dewatering) and include the total LF for each in the impact table. Please indicate approximate LF of pre-Helene culvert pipe and proposed LF of standard base ditch.

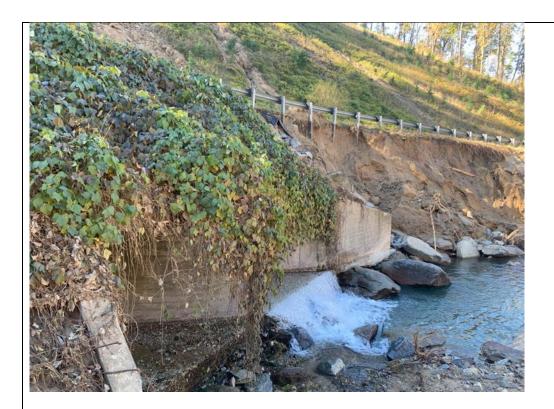
Response: Additional line items added to summary table to denote the different impact types. Existing approximate LF of pre-Helene culvert pipe has been added as a separate line item. Please note that this reported value is based solely on LiDAR obtained from NC Spatial Data. We do not have inlet/outlet locations for pipes, therefore, this value is speculative. The standard base ditch along the flow path of the ditch as shown in the plans is 150 LF, but the existing streamline distance is 131 LF.

David McHenry (NC WRC): Also, at site 7, is that short class II section the fill planned to fix to the RCBC perch (and stabilize the right bank)? Attached is a picture of this area.

Response: At the Inlet, we proposed to place Class II Rip Rap behind the wingwall to repair some Helene erosion.

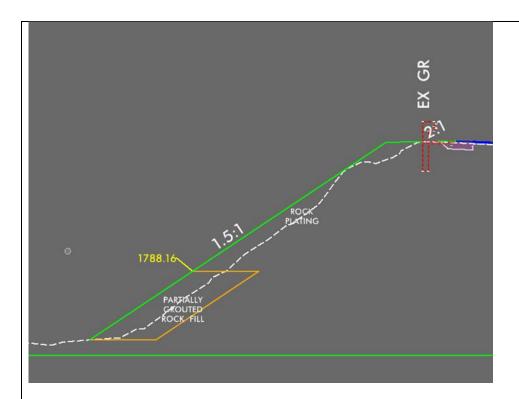


At the Outlet, we propose to place Class II Rip Rap in the creek to repair the perched culvert. As requested in the meeting, we have prepared a detail that will direct the contractor to channelize this rip rap.



David McHenry (NC WRC): And, what is the stabilization material and the profile (x-secs available?) proposed to extend 400 feet of so downstream? I didn't see (but may have missed) a description/detail.

Response: Downstream from the outlet will be repaired using the same method we used along the Broad River. The stabilization material will be grouted Class VII rip rap at the toe of the slope and Class II rip rap on up the slope where it is Rock Plating as detailed in the Geotechnical portion of the plans. See below for a typical cross section at station 62+50.



David McHenry (NC WRC): There wasn't rock slope there before and the toe of the fill slope washed-out, but there's still decent width shoulder along much of this area.

Response: There was a little rock at the toe of the slope before in this area but our designs place more, adds grout, and armors the upslope as requested to make it more resilient.



Amy Annino (DWR): Please include a cross section and a detail showing the proposed fill in the stream channel at the culvert outlet where the scour hole will be addressed.

Response: Detail 32 has been added and plan view callout updated.

Crystal Amschler (USACE) & Amy Annino (DWR): Need cross section (ditch detail typical for culvert outlet stabilization) showing the rip-rap at the culvert outlet.

Response: Detail 32 has been added and plan view callout updated.

Crystal Amschler (USACE): Need to break out quantities for rip-rap, pipe, etc. Add short narrative explaining what the Pre-Helene conditions looked like.

Response: Quantities have been broken out in the table and a short narrative describing how Hurricane Helene changed the area has been added to supplemental site narrative document.

David McHenry (NC WRC): I was somewhat surprised they are constructing a grouted wall on Grassy Creek site 7. For what it's worth that area was not stabilized in 2019 unless somebody went in and did that without coordinating with me – I was out there several times before and during slope construction above the road. There's a lot of bank scour right near the culvert outlet but still a decent amount of road shoulder and remaining fill slope progressing downstream, and the road never washed-out (see attached grassy creek photos). Seems like it is already "resilient" there from that standpoint. Really, a conventional rock fill would certainly be more environmentally benign (and sufficient?) than another grouted rock embankment since the roughness of plain stone would better temper the stream velocity and over time allow some vegetation to grow up through the rock. As many theorize the Broad system is going to cook for awhile, particularly if vegetation can't creep back in naturally and provide some shade where solid structures are on the banks.

Response: Matt Lauffer, NCDOT, and his stream modeling teams reached a decision to grout the embankment along Grassy Creek after extensive stream modeling was completed. See attached response from Matt justifying the grout.

From: Lauffer, Matthew S < mslauffer@ncdot.gov Sent: Wednesday, October 1, 2025 1:59 PM

To: Sarvis, Dean < Dean. Sarvis@stantec.com>; David Markwood, PE

<david.markwood@summitde.com>

Subject: RE: [External] RE: Helene NC 9 | Henderson | Application and Modification | SAW-2025-

00325 and 20250664

Hi Dean,

Please include this statement.

Statement for partially grouted rock fill:

Partially grouted rock fill is specified for this section to increase the effective median stone size (D50), thereby enhancing resistance to the elevated velocities and shear stresses produced by the steep channel gradient. With an average slope of approximately six percent between the culvert outlet and the downstream waterfall, hydraulic forces are significant. The partially grouted treatment provides additional stability, protects the banks from erosion, and ensures long-term performance and protection of habitat under these high-energy flow conditions.

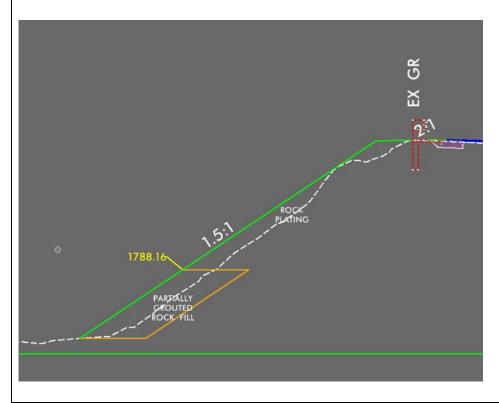
Best Regards,

Matt

Matthew (Matt) Lauffer, PE, CPM

State Hydraulics Engineer Hydraulics Unit Department of Transportation David McHenry (NC WRC): Anyway, if they go with another grouted embankment here, they should replace those very abundant boulders that are in the active channel (see photos) to retain some existing habitat complexity, like the approach recommended at site 1. I'd hate to see that converted to ditch-like cross-section.

Response: As shown in the cross section at Station 62+00 below, it is not NCDOT's intention to disturb the boulders that are in the stream bed of Grassy Creek shown in your photos, only stabilize the roadside fill slope and not go beyond the pre-Helene edge of creek. From your pictures, we believe grass has grown from the hydroseeding and that grass is hiding some of the damage that needs to be repaired underneath. See photos below. The roadway and geotechnical engineers believe that these unstable areas need to be protected with rip rap.





Eroded bank along Grassy Creek looking downstream (11/12/2024).



Eroded bank along Grassy Creek looking upstream (11/12/2024).

Amy Annino (DWR): Please identify and differentiate the LF of proposed impact types (ex. rip rap fill, additional culvert pipe, channel relocation) and include the total LF for each in the impact table. Please differentiate temporary impact types (ex. rip rap fill, culvert pipe, dewatering) and include the total LF for each in the impact table. Please indicate approximate LF of pre-Helene culvert pipe and proposed LF of culvert pipe. Please include a cross section at the culvert outfall showing how the two culverts will interface with the stream channel.

Response: The impact summary table has been broken out to better illustrate the different impact types. The temporary impact types have been separated out as separate line items. Please see supplemental detail 28A for the cross section at the existing culvert outfall.

Look at/remove dual line in XSC view.

Response: The dual line is a top bank line but has been removed for clarity.

Site 9

Amy Annino (DWR): Please identify and differentiate the LF of proposed impact types (ex. rip rap fill, additional culvert pipe, channel relocation) and include the total LF for each in the impact table. Please differentiate temporary impact types (ex. rip rap fill, culvert pipe, dewatering) and include the total LF for each in the impact table. Please indicate approximate LF of pre-Helene culvert pipe and proposed LF of culvert pipe.

Response: Site 9 in the summary table has been broken out as requested. Since the approximate LF of pre-Helene culvert pipe is included with site 8, the line item is missing from this site to avoiding counting it twice.

Site 10

Amy Annino (DWR): The JS cannot be filled without a culvert pipe installed to carry stream flow to downstream waters. Please show how the JS will be placed in a culvert and verify that the stream will be connected to downstream waters located off project.

Response: Please see the response to the "Why is this a JS?" comment below for explanation on the change to the JS line extents for the site. Using the revised JS line, the stream is currently in a stable condition conveying flow down the slope. Therefore, geocells are no longer needed over the footprint of the channel. I reached out to Geotech for confirmation, and they have confirmed that the geocells can wrap around the existing channel footprint leaving the stream undisturbed. In lieu of geocells filling in the channel, supplemental rip rap has been proposed to compliment the boulders currently located along the stream banks.

Amy Annino (DWR): Why is this a JS?

Response: Pre-Helene, this general area has been the site of historical manipulation including spring boxes, channel re-routes, old road alignments, etc. In September 2024 Helene caused a major slump in this valley and continued to be bare through the winter. The original delineation was completed for this project in February 2025 when the site was still bare and somewhat freshly disturbed. Seeps and drainage had begun to carve channels across the slope below the road and Stream SO appeared to begin in a parallel section along NC-9. To better assess this site due to questions regarding geotechnical activities here. Stantec's biologist revisited site 10 on September 15, 2025 (stream SO).

After the effects of a full growing season and some vegetation establishment it appears that the short section parallel to the road is actually a scour channel and does not carry flow sufficient enough to form a jurisdictional intermittent channel. That section does not appear to be fed by groundwater. The current origin of the stream appears to be from a seep downslope from the outlet of the 18" temporary pipe.

The portion of the stream parallel to the roadway alignment has been removed from the plan set and the impacts associated with that portion have been removed as well.

Site 11

Include cross section at outlet of 2 existing 48" pipes to show how pipes will tie-in with the channel.

Response: Please see supplemental detail 26A for the cross section at the existing 2@48" CMP outfall. Quantities in impact summary table have been broken out for clarification between reasoning for temporary and permanent impacts.

Site 12

Amy Annino (DWR): Any permanent fill placed in the stream (as part of the energy dissipation pad at stream culvert outlet) must be properly keyed into the stream bed flowing from the culvert AND in the receiving stream, so as not to disrupt stream flow or block aquatic passage of either stream. Please provide a detail showing how energy dissipator pad will interface with both stream channels. Please indicate whether the culvert will be buried to meet low flow and aquatic passage requirements (Condition 11 of DWR GC 7466).

Response: Both inlet and outlet pipes have been upsized to account for the burial depth of the pipe. The proper callouts have been added to the plan view for the burial depths. Detail 33 has been added to the detail sheet to show how the pipe will interact with the stream. The detail indicates that the rip rap shall be keyed-in to not disrupt the natural channel dimensions. The quantities provided in the impact summary table have been broken out to show the differences between impacts caused by the rip rap pad versus temporary dewatering for the installation.

Amy Annino (DWR): Please include the LF of additional culvert pipe proposed / LF loss of channel.

Response: This site has been broken out in the summary table for the inlet/outlet locations where the proposed pipe network is causing permanent impacts. The temporary impacts for dewatering has been moved to separate line item as well.

Revised Regulatory Break-Down Tables:

Impact Site	Impact Category	Permanent Fill	Bank Stabilization	Temporary Impacts	Permit Proposed / Impact Description			
	Maintenance Exemption	>>>			The estimated, pre-Helene length of pipe of 115 lf has been noted in the summary table. This estimated value is based solely on LiDAR from NC Spatial Data.			
	Non-Notifying							
Site 5 UT to Broad River	Notification Required (Not After the Fact)	65 lf (26'+39')	62 lf (inlet: 19' Outlet: 43')		NWP 3: Hurricane Helene re-routed this stream system. Prior to the storm, the stream was conveyed through a 42" CMP which was subsequently buried. A temporary 24" HDPE was installed after Helene and currently conveys the stream. A 48" pipe is proposed for the permanent restoration of this crossing. The restoration will result in 65 If (26 + 39) of channel replacement and 62 If (19 + 43) of outlet stabilization impacts.			
	Notification Required (After the Fact)			32 lf	A temporary/ emergency 24" HDPE, 32 lf in length was installed to temporary handle this stream.			
	Maintenance Exemption	>>>			The estimated, pre-Helene length of pipe of 166 lf has been noted in the summary table. This estimated value is based solely on LiDAR from NC Spatial Data.			
	Non-Notifying							
Site 6	Notification Required (Not After the Fact)	6 lf	125 lf		NWP 3 Prior to the storm, this site was conveyed by an existing 42" CMP that would bypass the pipe and overflow to site 5 during high rainfall events. After the storm, this stream flows within the overflow channel/roadside ditch to flow under NC-9 in the temporary 24" HDPE. The existing 42" CMP was buried by the storm. Upon the hydraulic analysis of			
UT to Broad River					the 2 pipes/streams (Site 5 and 6), the drainage area could be consolidated to one crossing (48" CSP). By using a single crossing, the ditch backslopes avoided cutting into the mountainside (the team was asked by NCDOT to avoid cutting into the mountainside where possible). The confluence with site 5 also maintains the existing drainage patterns that are currently present at the site. NWP 33			
				26 lf	We anticipate the contractor using dewatering techniques to construct this site. To account for dewatering, impacts are shown to the PDE line.			
	Notification Required (After the Fact)							

Impact Site	Impact Category	Permanent Fill	Bank Stabilization	Temporary Impacts	Permit Proposed / Impact Description
Site 7 Grassy Creek	Maintenance Exemption	19 lf	379 lf		This site includes Grassy Creek impacts. Hurricane Helene caused the creek to widen into the existing fill slope on NC-9 due to erosion during the high flow periods experienced during the storm. The team was tasked with using the proposed fill slope to recreate the pre-Helene stream banks. The impacts for this are the "rip rap embankment" and "dewatering" line items in the summary table. The team was also asked to repair a scour issue at the outlet of the existing 2@8'x10' RCBC. The impact for this improvement is the "outlet rip rap" line item in the summary table (19 lf).
	Non-Notifying				
	Notification Required (Not After the Fact)			207 lf	NWP 3: This temporary impact is to accomplish the work noted above.
	Notification Required (After the Fact)				

Impact Site	Impact Category	Permanent Fill	Bank Stabilization	Temporary Impacts	Permit Proposed / Impact Description
	Maintenance Exemption	>>>			The pre-Helene existing LF of the existing culvert (48 lf) has been added as a line item in the summary table.
	Non-Notifying				
Site 8 UT to Grassy Creek	Notification Required (Not After the Fact)	41 lf (Inlet: 11 Outlet: 30)	81 lf (Inlet: 44 Outlet: 37)	37 lf (Inlet: 17 Outlet: 20)	NWP 3: The pre-Helene existing drainage pattern included a confluence point between site 8 and site 9 streams on the upstream side of the road. This confluence point was a large 6'-12' hole at the inlet of the existing 36" CMP. Hurricane Helene filled this hole in by about 7 feet. Since the storm, crews were able to dig down to expose the inlet and make it functional until proposed repairs were complete. Upon analysis of this site, the water from the inlet channel currently flows along a moderately steep slope, then drops down into the excavated hole. NCDOT proposes to create a drop structure to provide a more stable transition down to the pipe invert. Due to the steepness of the pipe, burial is not proposed to avoid head cut issues. On the outlet end of the existing 36" CMP, the pre-Helene condition flowed into a roadside channel just as it turned offsite to a downstream driveway crossing eventually flowing into Grassy Creek (Site 7). Hurricane Helene brought much destruction to this area to the point it was unrecognizable. By the start of the project, relief efforts had been made to repair the downstream driveway crossing. In an internal meeting with NCDOT, it was decided the repairs for the channel flowing offsite downstream of NC-9 would be part of a separate stream restoration contract. Therefore, the proposed outlet channel was designed to tie-in to the post-storm channel.
	Notification Required (After the Fact)				

Impact Site	Impact Category	Permanent Fill	Bank Stabilization	Temporary Impacts	Permit Proposed / Impact Description
	Maintenance Exemption				
	Non-Notifying				
Site 9 UT to Grassy Creek	Notification Required (Not After the Fact)	44 ft 13 lf 2 lf	56 lf		NWP 3: In the pre-Helene condition, the channel met the stream from Site 8 at the existing 36" CMP inlet. Hurricane Helene brought much soil and debris from higher in the watershed and deposited it here. Based on the analysis of the drainage area, an additional proposed pipe crossing is needed. To fit the pipe underneath NC-9 with appropriate cover, the proposed 54" WSP would require lowering the channel elevation at the inlet side. To ensure a smooth and stable transition to a lower elevation, a drop structure is proposed. NCDOT does not propose mitigation for the 59 feet of stream in this scenario. There are no transportation improvements proposed to NC 9, and the resulting loss of water impacts are the result of Hurricane Helene and the sizing of pipes using modern drainage recommendations. Additionally, as the previous pipe was undersized, this site corrects deficiencies and provides a more stable hydraulic situation for this stream. Furthermore, this stream valley contains a significant amount of loose material well outside of NCDOT's purview. NCDOT is constructing an area to help contain this upstream material to help ensure system stability.
				24 ft	NWP 33: Dewatering for the installation of the above-described impacts.
	Notification Required (After the Fact)				

Impact Site	Impact Category	Permanent Fill	Bank Stabilization	Temporary Impacts	Permit Proposed / Impact Description
	Maintenance Exemption				
	Non-Notifying				
Site 10 UT to Grassy Creek	Notification Required (Not After the Fact)		46 lf		NWP 3: In the pre-Helene condition, most of the flow for the stream came from a wet weather seepage in the slope as well as very minimal non-jurisdictional flow coming from the poorly functioning 18" cross pipe underneath NC-9. A soil nail wall is being proposed at the existing crossing. Pipes cannot be installed in areas where soil nail walls are present due to the location of the nails not being known until they are built in the field. The nails typically extend all the way across the road where it is being placed. Though the existing crossing could not be replaced, the existing drainage pattern for the area did not change as the existing pipe does not function as intended with most of the mountainside non-jurisdictional flow bypassing the existing cross pipe and continuing downhill along NC-9. The proposed drainage pattern follows the behavior of the existing condition and continues to direct the stormwater to flow along NC-9. The proposed slope stake lines beyond the soil nail wall show the extents of the proposed geocells to be installed to protect an unstable slope caused by a landslide that occurred during Hurricane Helene. After consultation with Geotech, the geocells will be able to be wrapped around the footprint of the channel. Supplemental rip rap has been included to compliment the boulders along the stream banks for stability in lieu of the geocells filling in the channel.
	Notification Required (After the Fact)				

Impact Site	Impact Category	Permanent Fill	Bank Stabilization	Temporary Impacts	Permit Proposed / Impact Description
Site 11 Grassy	Maintenance Exemption	51 lf	1	+	In the pre-Helene condition, the existing 2 @ 48" CMP was perched above the existing bed at the outlet indicating scour issues. Hurricane Helene worsened the scour issues and increased the perched elevation between the existing bed and the existing pipe outlet inverts. The existing crossing was analyzed, and the existing pipes were determined to be sized appropriately and in good condition. The team was asked to help mitigate the scour issues by raising the streambed by filling in the existing scour hole with rip rap. Detail 26A has been added to the detail sheet to show how the outlet of the existing 2 @ 48" CMP will tie-in with the scour hole repair. The detail includes verbiage to key-in the rip rap.
Creek	Non-Notifying				
	Notification Required (Not After the Fact)			16 lf	NWP 33: It is anticipated the contractor will either use impervious dikes or a pump around operation to dewater the site. To account for this activity, impacts are shown to the PDE line.
	Notification Required (After the Fact)				

Impact Site	Impact Category	Permanent Fill	Bank Stabilization	Temporary Impacts	Permit Proposed / Impact Description
	Maintenance Exemption				
	Non-Notifying				
Site 12 UT to Broad River	Notification Required (Not After the Fact)		4 lf	15 lf	In the pre-Helene condition, the existing 24" CMP had remnants of an older rip rap pad at the outlet. Hurricane Helene further washed out the existing rip rap pad. For the proposed condition, the crossing was analyzed and the existing 24" CMP was found to be undersized. The crossing was analyzed as a 36" RCP and was upsized to a 42" RCP to account for the burial depth. Burying the proposed outlet of the system ensures the crossing would be compliant with Condition 11 of DWR GC 7466. At the proposed outlet, a rip rap pad was proposed for energy dissipation. Detail 33 has been added to indicate how the pipe will interact with the stream. The detail specifies that the rip rap must be keyed-in.
	Notification Required (After the Fact)				

Impact Site	Impact Category	Permanent Fill	Bank Stabilization	Temporary Impacts	Permit Proposed / Impact Description
	Maintenance Exemption				
	Non-Notifying				
Site 13 UT to Broad River	Notification Required (Not After the Fact)	13 lf (3 lf on the inlet side of the 36" pipe & 42" pipe, and 10 lf on the inlet side of the 36" pipe)			NWP 3: In the pre-Helene condition, the existing 24" CMP behaved as a normal driveway pipe. Hurricane Helene did not destroy the channel, but it did bring excessive debris that piled up on the inlet side. Analyzing the crossing indicated that the existing pipe was undersized. The pipe was analyzed as a 30" unburied and was upsized to a 36" to account for the burial depth. Burying the proposed inlet of the system ensures the crossing would be compliant with Condition 11 of DWR GC 7466. The impacts shown for the portion of the stream in between the existing 24" driveway pipe and the 24" pipe under NC-9 (Site 12) has been added as a line item for this site. NCDOT does not propose mitigation for the 13 feet of stream in this scenario. The are no improvements proposed to NC 9, and the resulting loss of water impacts are the result of Hurricane Helene and the sizing of pipes using modern drainage recommendations.
				10 lf	NWP 33: It is anticipated the contractor will use dewatering techniques for the site. To account for the dewatering, impacts have been extended past the area needed for installation.
	Notification Required (After the Fact)				

		Permanent Fill	Bank Stabilization	Temporary Impacts
	Maintenance Exemption	Site 7: 19 Site 11: 51 70 lf	Site 7: 379 379 If	
		4	449 lf	
	Non-Notifying			
Category Totals	Notification Required (Not After the Fact)	Site 5: 65 Site 6: 6 Site 8: 41 Site 9: 59 Site 13: 13	Site 5: 62 Site 6: 125 Site 8: 81 Site 9: 56 Site 10: 46 Site 12: 4 374 If	Site 6: 26 Site 7: 207 Site 8: 37 Site 9: 24 Site 11: 16 Site 12: 15 Site 13: 10
			335 lf	
	Notification Required (After the Fact)			Site 5: 32 5 lf*
NC 0	Unnau Section Totals	254 lf	753 lf	240 If
NC 9	Upper Section Totals	1	340 lf	

NC 9 Lower Section Totals	1,821 lf	1,200 lf
NC 9 Project Totals	2,828 lf	1,540 lf*

^{*}When comparing this table with the Impact Summary Table, there is a 5 lf difference, as the "after the fact" impact is not shown in Impact Summary Table

The information above is provided in accordance with the "US Army Corps of Engineers, Wilmington District's Information for Hurricane Helene Recovery and Repair Work Conducted by the North Carolina Dept of Transportation in Waters of the US" dated February 10, 2025.

The total permanent and temporary impacts at Site 1 remain 2,295 linear feet of stream impact. However, the division of impacts has changed. New values are shown in red.

Impact Site	Impact Category	Permanent Fill	Bank Stabilization	Temporary Impacts	Permit Proposed / Impact Description
Site 1	Maintenance Exemption	-	1,073 lf (0.278 ac) 1,129 ft (0.300 ac)		See above explanation for in channel work.
	Non-Notifying				+
Broad River	Notification Required (Not After the Fact)			1,222 lf (1.029) 1,166 lf (1.064 ac)	NWP 33: This impact includes an update to impacts requested within the original permit. Adjustments are based on the stream stabilization measures.
	Notification Required (After the Fact)				

The remaining sites on the lower section (Sites S2, S3 and S4) have not changed.

Endangered Species Act: Protected Species listed from IPaC¹ as of the date of this application:

Common Name	Habitat Present	Survey Dates ²	Proposed Biological Conclusion	FWS Concurrence Remarks
Gray bat Northern long-eared bat Tricolored bat (Proposed)	Yes	2/24/2025	May Affect, Likely to Adversely Affect (under PBO/PCO) ³	Concur ⁴
Bog turtle	No	n/a	Not Required	n/a
Monarch butterfly (Proposed) ⁵	Unknown	n/a	n/a	n/a
Rock gnome lichen	No	n/a	No Effect	n/a
White irisette	No	2/24/2025	No Effect	n/a
Small whorled pogonia	No	2/24/2025	No Effect	n/a

- 1 IPaC Information for Planning and Consultation (US Fish and Wildlife Service)
- 2 Original delineation and habitat survey conducted 2/24/2025.
- 3 There is a total of 0.34 acre of tree clearing over the entire project.
- 4 Section 7 consultation was completed for the entire project on July 7, 2025, and included using the NCDOT Bat Programmatic Biological Opinion.
- 5 Due to the recent listings of monarch butterfly within the proposed action area, NCDOT does not have complete information at this time. It is anticipated that construction will be complete by the timeframes proposed for full listing, should the species be formally listed.

Historic Resources Summary (documentation included)

106 Topic	Findings						
Historic Architecture	No Historic Properties Present						
Archaeology	No Surveys Required						
Tribal Coordination	Tribe	Response					
Tribal Coordination Letters were sent to the following Tribes on March 10, 2025:	Catawba Indian Nation	March 27, 2025					
	Cherokee Nation	No response received					
	Eastern Band of Cherokee Indians	No response received					
	Muscogee (Creek) Nation	No response received					
	United Keetoowah Band of Cherokee Indians in Oklahoma	No response received					

Based on this additional information, NCDOT requests resumption of the processing of the environmental permits for this project.

If you have any questions or need additional information, please contact Michael Turchy, at maturchy@ncdot.gov or (919) 707-6157.

Sincerely,



Michael A. Turchy

Environmental Coordination and Permitting Group Leader



North Carolina Department of Transportation

Highway Stormwater Program



Version 3.02; Released April 23, 2024) FOR NCDOT PROJECTS													
WBS Element:	18314.1045	TIP/Proj No:	NC-9		County(ies):				Pag	ie 1	of 2		
VVDO LIEMENT.	10014.1040	Til /i Toj No.	110-5	_					1 05		01 2		
		100111015005			eneral Project I	ntormation		_			E///000E		
WBS Element:		18314.1045035		TIP Number:	NC-9		Project		Roadway Widening	Date:	5/1/2025		
NCDOT Contact:	Address	Josh Deyton				Contractor / Desig	ner: Address:		esign Group, PA				
Address		200 11000101 11000	253 Webster Road				Address:	000 0000	Franklin Rd				
		Sylva, NC 28779						Raleigh, N	C 27606				
		200 004 5044							240				
		828-331-5211					919-859-22						
City/Town:	Email:	jbdeyton@ncdot.go	jbdeyton@ncdot.qov Bat Cave				Hende		ingatedesign.com	_			
River Basin(s):		Broa		Cave		County(ies): CAMA County?	Nende						
Wetlands within Proj	iact Limite?	No	au			CAWA County?	IN	J					
Wetlands Within 1 10	ject Lillits:				Project Desc	rintion							
Project Length (lin. r	niles or feet):	1.9	7	Surrounding		Residential, Woode	d Conservation	n Forest					
Project Length (iiii. i	illes of feet).	1.9	<u> </u>	Proposed Project		rtoolaontaal, vvoodo	Existing Site						
Project Built-Upon A	roa (ac)		14.0	rioposeu riojec	ac.			5.8	ac.				
Typical Cross Section		NC-9: Southbound la		paved lane with 4' sh		+ 2' grass from 10+12	Existing NC-9		lane with 3' shoulders (1' pave	d + 2' grass	in each direction.		
. , p	2 000	to 91+00 -L-)(4' gras	s from 91+00 to 1	13+77 -L-). Northbou	nd lane includes a	10' paved lane with 3'	Varying cut ar			u · 2 g.uss,	iii odoii dii oolioiii		
				+12 to 91+00 -L-)(3'		to 113+77 -L-).							
		varying cut and till si	iopes (see XSC III	e for detailed informa	uon).								
Annual Avg Daily Traffic (veh/hr/day):		Design/Future	e:	1000	Year	2025	Existing:		1000	Ye	ear: 2025		
General Proje	ct Narrative:		ne North Carolina Department of Transportation (NCDOT) has proposed repairs to NC-9 from US 74 ALT to the Henderson County Line. The project, NC-9, was proposed in										
(Description of Min									roject (2@8'x10' RCBC) that is				
Quality In	mpacts)		proposed design. There have been 2 repiars proposed to the structure fixing erosion issues on either end of the culvert (see PSH 08 for inlet/outlet improvements). Erosion and										
			Sediment Control measures to preserve water quality for instream construction activities will include floating turbidity curtains and/or impervious dikes. Rip rap has been added to putlets in jurisdictional features in order to dissipate energy and reduce velocities.										
		outlets in jurisdiction	mai leatures in o	idei to dissipate en	lergy and reduce	velocities.							

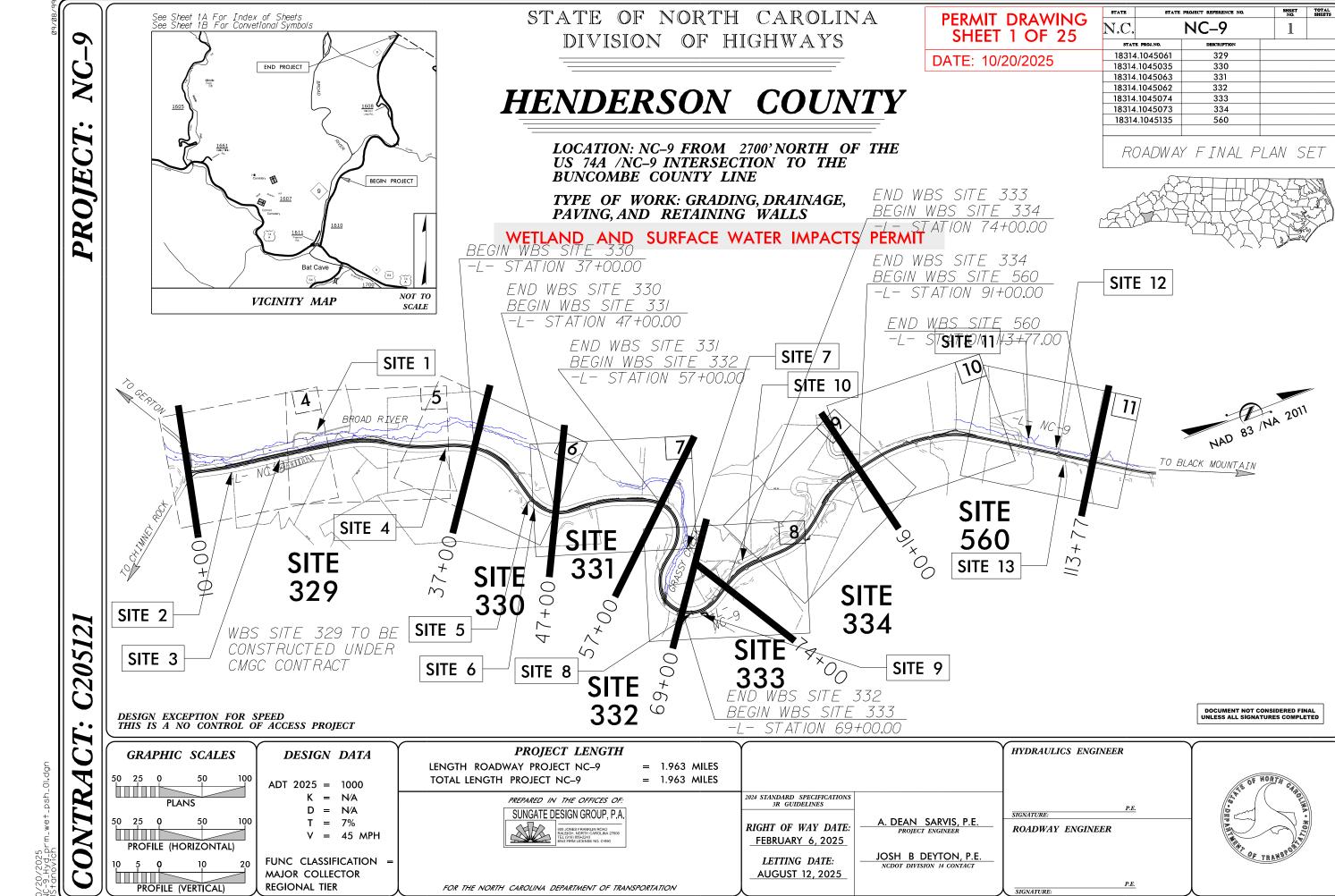


North Carolina Department of Transportation



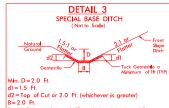
Highway Stormwater Program STORMWATER MANAGEMENT PLAN

(Version 3.02; Released April 23, 2024)			FOR NCDOT F	PROJECTS						
WBS Element: 18314.1045	TIP/Proj No.:	NC-9	County(ies):		Page	2	of	2		
			General Project	Information						
Waterbody Information										
Surface Water Body (1):		I River	NCDWR Stream In	idex No.:		9-(1)				
NODWD Confees Water Classification for Water Dark			Primary Classification:	Class (С					
NCDWR Surface Water Classification for Water Body			Supplemental Classification:	Trout Water	rs (Tr)					
Other Stream Classification:	Noi	ne					1			
Impairments:	Noi	ne								
Aquatic T&E Species?		Comments:								
NRTR Stream ID:						Buffer Rules in Effect:		N/A		
Project Includes Bridge Spanning	Water Body?	No	Deck Drains Discharge Over Buffer? N/A			Dissipator Pads Provided in Buffer?			N/A	
Deck Drains Discharge Over Wate	ck Drains Discharge Over Water Body?		(If yes, provide justification in the General Project Narrative)			(If yes, describe in the General Project Narrative; if no, justify in the				
(If yes, provide justification in the General Project Narrative)		Ī	General Project Narrative)							
Surface Water Body (2):		Grassy	/ Creek	NCDWR Stream Index No.:						
NCDWR Surface Water Classification for Water Body		Primary Classification:	Class C							
		Supplemental Classification:	Trout Water	rs (Tr)						
Other Stream Classification: None						1				
Impairments:	: None									
Aquatic T&E Species?		Comments:								
NRTR Stream ID:	Grassy Creek			Buffer Rules in Effect:		N/A				
Project Includes Bridge Spanning	ncludes Bridge Spanning Water Body?		Deck Drains Discharge Over Buffer? N/A			Dissipator Pads Provided in Buffer? N/A				
Deck Drains Discharge Over Wate		N/A	(If yes, provide justification in the General Project Narrative)			(If yes, describe in the General Project Narrative; if no, justify in the				
(If yes, provide justification i				Gene	eral Project Nar	rative)				
Surface Water Body (3):			NCDWR Stream Index No.:							
NCDWR Surface Water Classification for Water Body		Primary Classification:								
		Supplemental Classification:								
Other Stream Classification:						1				
Impairments:										
Aquatic T&E Species?	Comments:									
NRTR Stream ID:				Buffer Rules in Effect:						
Project Includes Bridge Spanning			Deck Drains Discharge Over Buffer?			Dissipator Pads Provided in Buffer?				
Deck Drains Discharge Over Water Body?		(If yes, provide justification in the General Project Narrative)			(If yes, describe in the Ge			no, justify	y in the	
(If yes, provide justification in the General Project Narrative)]	General Project Narrative)						





FROM STA. 14+00 TO STA. 17+50 -L- RT



Type of Liner = Grouted Class 'B' Rip-Rap, Keyed-In



FROM STA. 41+67 TO STA. 42+00 -L- RT

DETAIL 9

Type of Liner = Class 'B' Rip-Rap, Keved-In

FROM STA. 31+50 TO STA. 32+50 -L- RT

DETAIL 10 TOE PROTECTION (Not to Scale)

Type of Liner = Grouted Class 'B' Rip-Rap, Keyed-In

DETAIL 11 STANDARD BASE DITCH (Not to Scale)

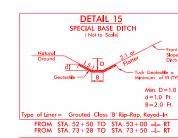
Min. D=2.0 Ft

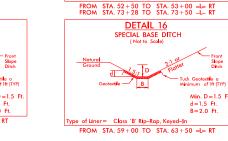
FROM STA. 35+00 TO STA. 35+47 -L- RT



















ope of Liner = Grouted Class 'B' Rip-Rap, Keved-In FROM STA. 75+50 TO STA. 77+68 -L- RT

FROM STA. 80+00 TO STA. 82+00 -L- RT FROM STA. 83+00 TO STA. 85+50 -L- RT





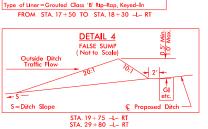
DATE: 10/20/2025

PROJECT REFERENCE NO. SHEET NO. ROADWAY DESIGN HYDRAULICS ENGINEER ENGINEER

DOCUMENT NOT CONSIDERED FINAL UNLESS ALL SIGNATURES COMPLETED

SUNGATE DESIGN GROUP, P.A.





STA. 19+75 —L— RT STA. 29+80 —L— RT STA. 39+57 —L— RT STA. 64+86 —L— RT STA. 81+76 —L— RT STA. 82+50 —L— RT



FROM STA. 20+00 TO STA. 22+00 -L- RT



FROM STA. 22+00 TO STA. 22+50 -L- RT FROM STA. 32+50 TO STA. 33+50 -L- RT FROM STA. 86+50 TO STA. 87+14 -L- LT



FROM STA. 22+50 TO STA. 29+72 -L- RT FROM STA. 33+50 TO STA. 35+00 -L- RT





SPECIAL BASE DITCH

FROM STA. 90+70 TO STA. 93+50 -L- RT

STA, 107 + 52 -L- LT

DETAIL 27 SPECIAL 'V' DITCH (Not to Scale)

FROM STA. 111+00 TO STA. 113+00 -L- RT

DETAIL 29 SPECIAL 'V' DITCH (Not to Scale)

FROM STA. 98 + 50 TO STA. 99 + 00 -L- RT

Min. D = 0.5 Ft.

Type of Liner= CL I Rip-Rap - Keyed-In

PIPE OUTLET CHANNEL STABILIZATION (Not to Scale)

d=1.5 Ft. B=2.0 Ft.

FROM STA. 64+41 TO STA. 65+00 -L- RT FROM STA. 95+50 TO STA. 97+36 -L- RT FROM STA. 99+00 TO STA. 101+50 -L- RT



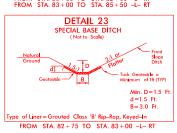
FROM STA. 65+00 TO STA. 66+50 -L- RT



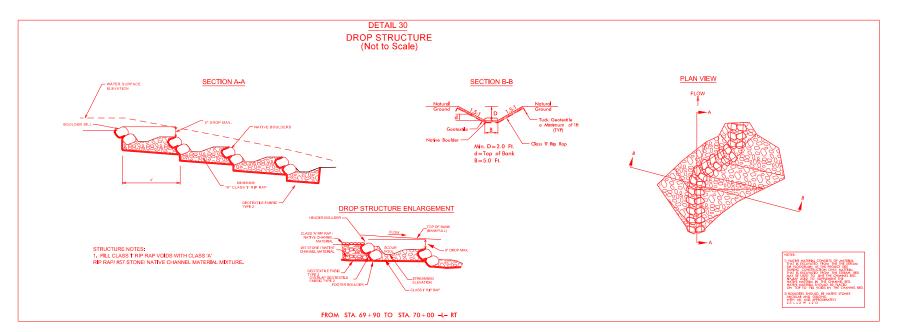


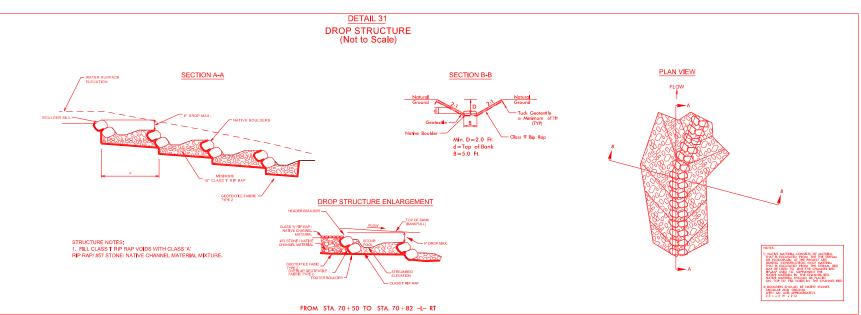






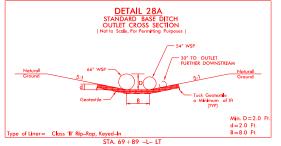


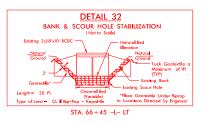


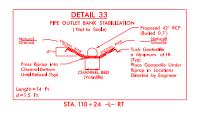


SUPPLEMENTAL DITCH DETAILS FOR PERMITTING

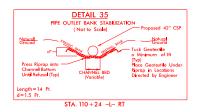












PROJECT REFERENCE NO.

NC-9

ROADWAY DESIGN
ENGINEER

PROJECT REFERENCE NO.

ROADWAY DESIGN
ENGINEER

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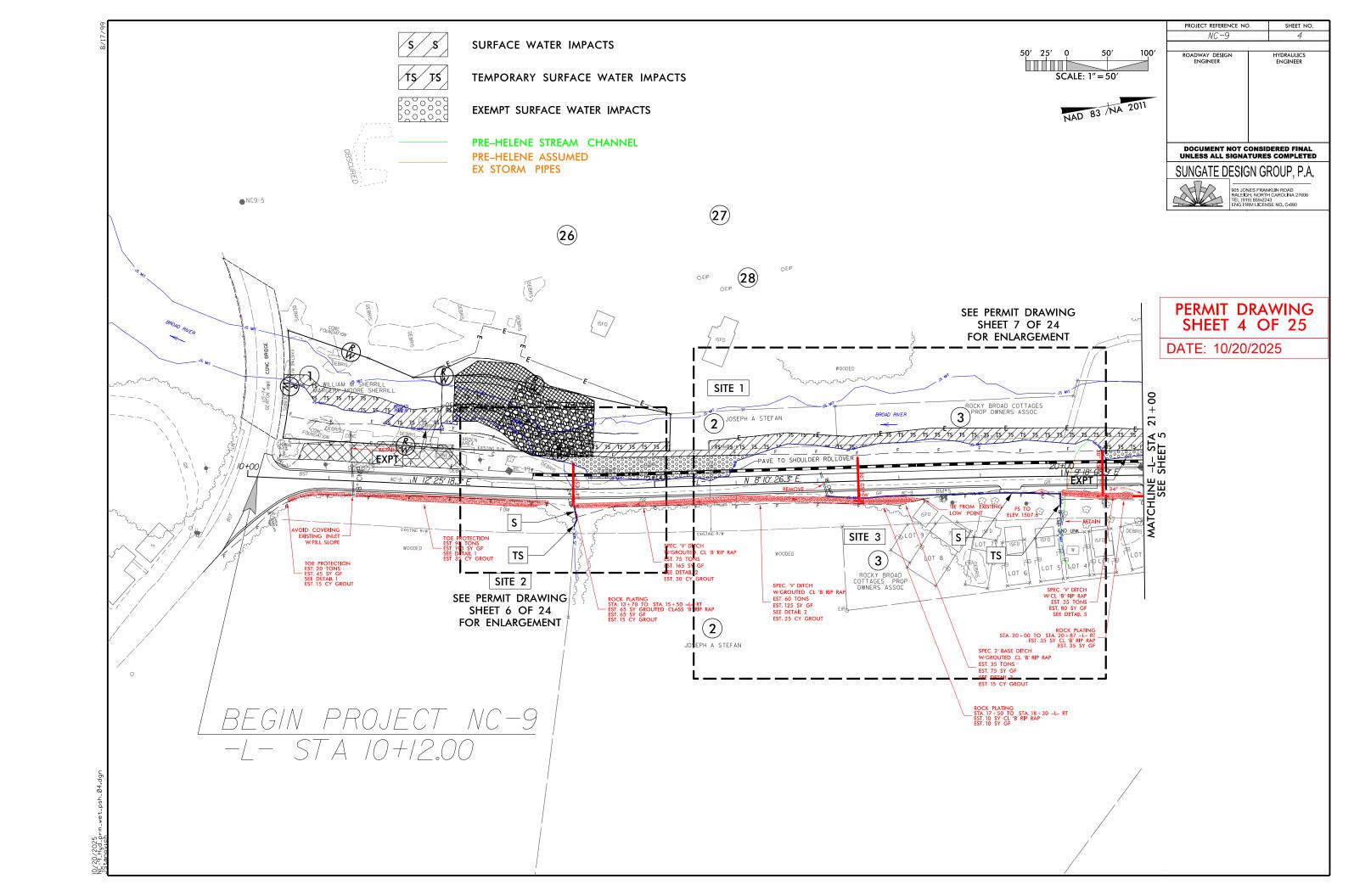
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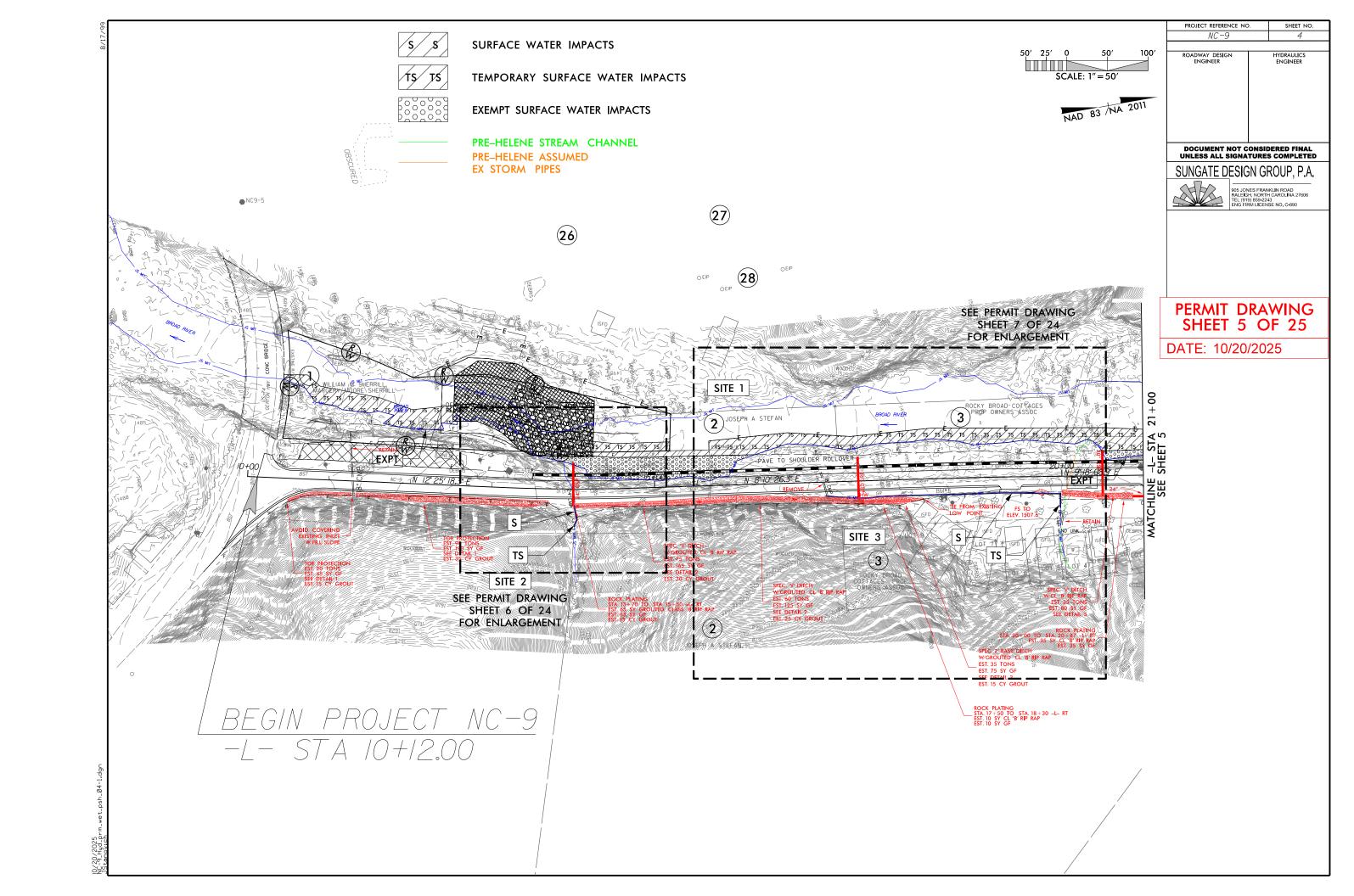
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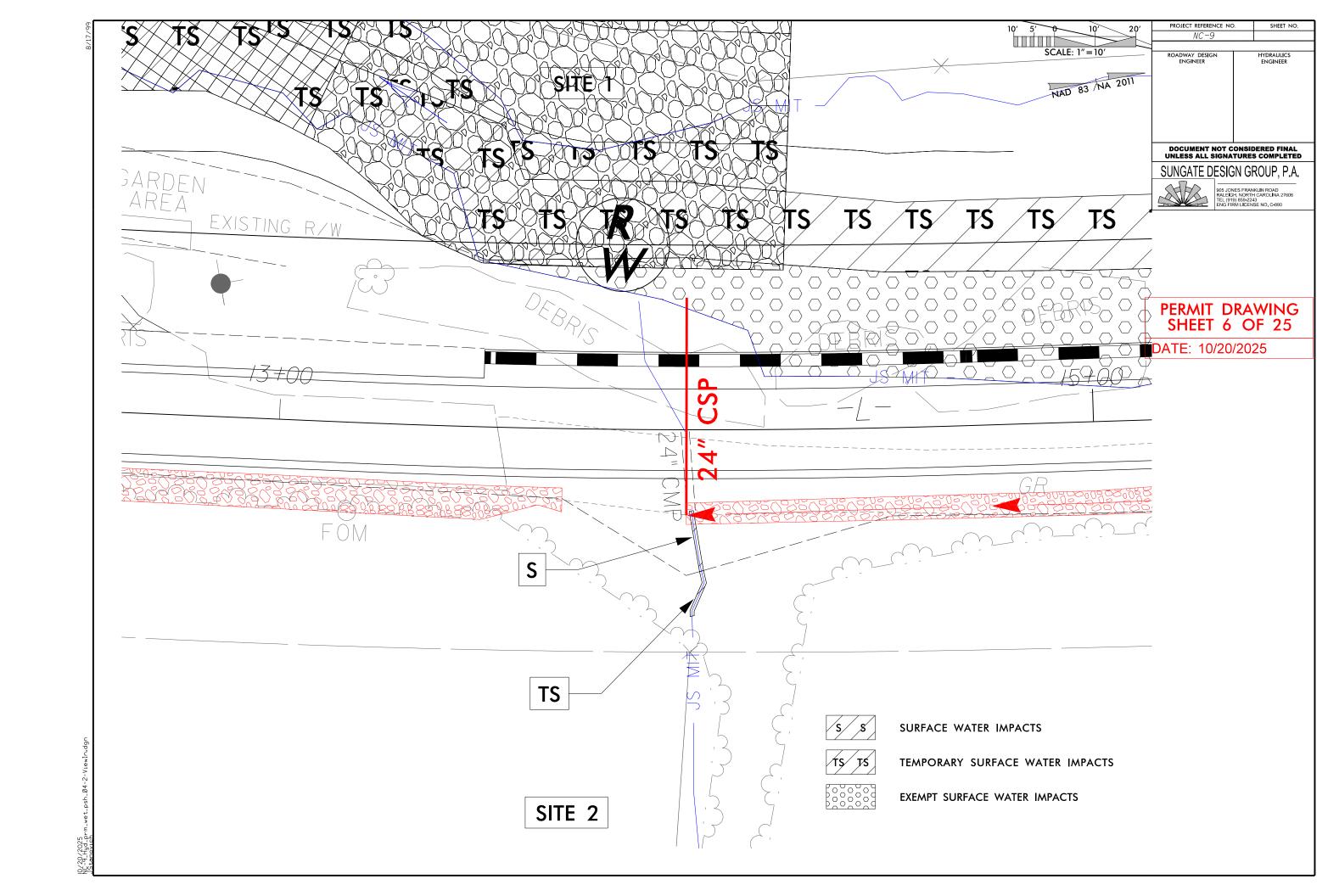
PERMIT DRAWING SHEET 3 OF 25

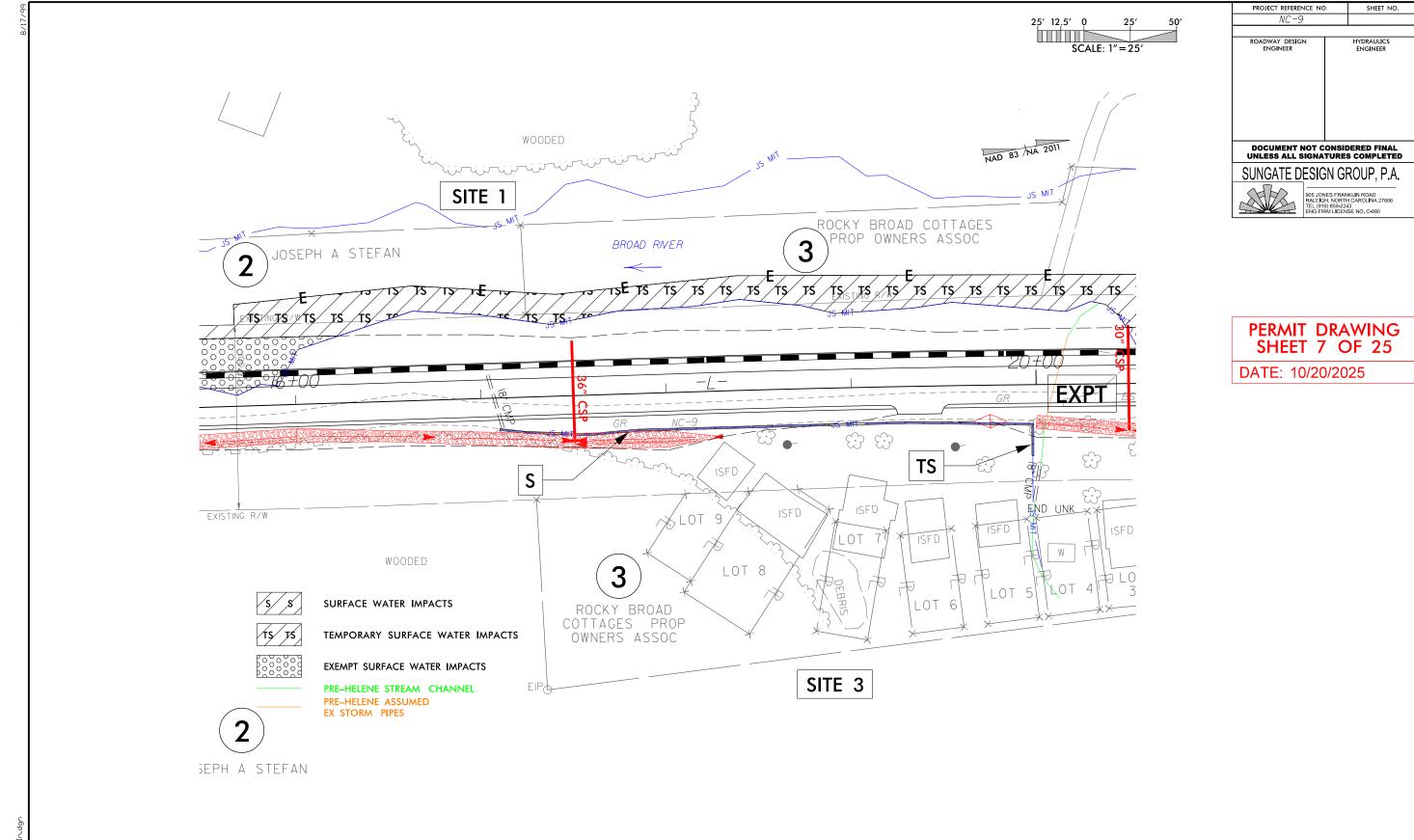
DATE: 10/20/2025

10/29/2023 10/-9_Hyd_prm_wet_psh_02B2.dgn

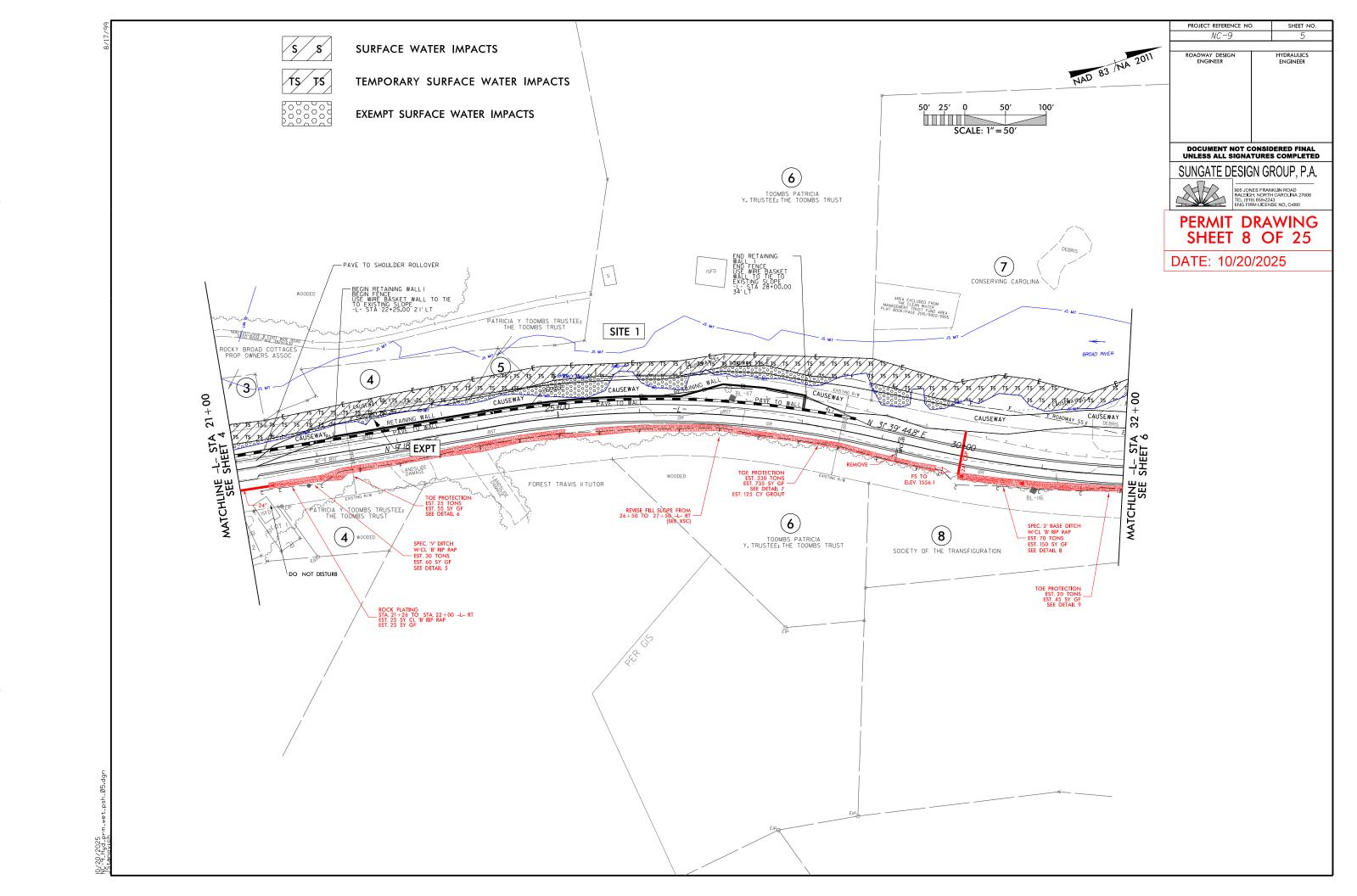


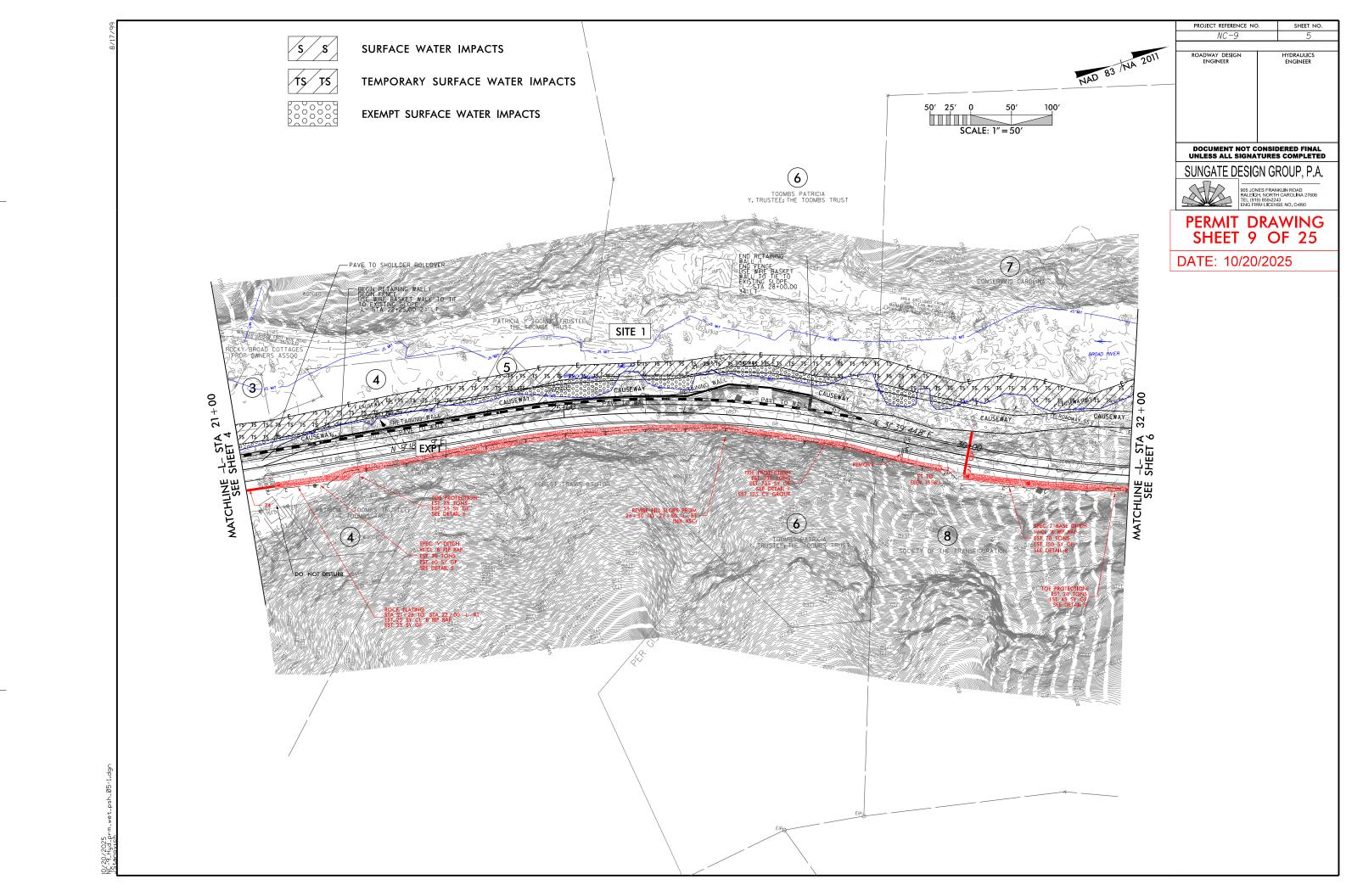


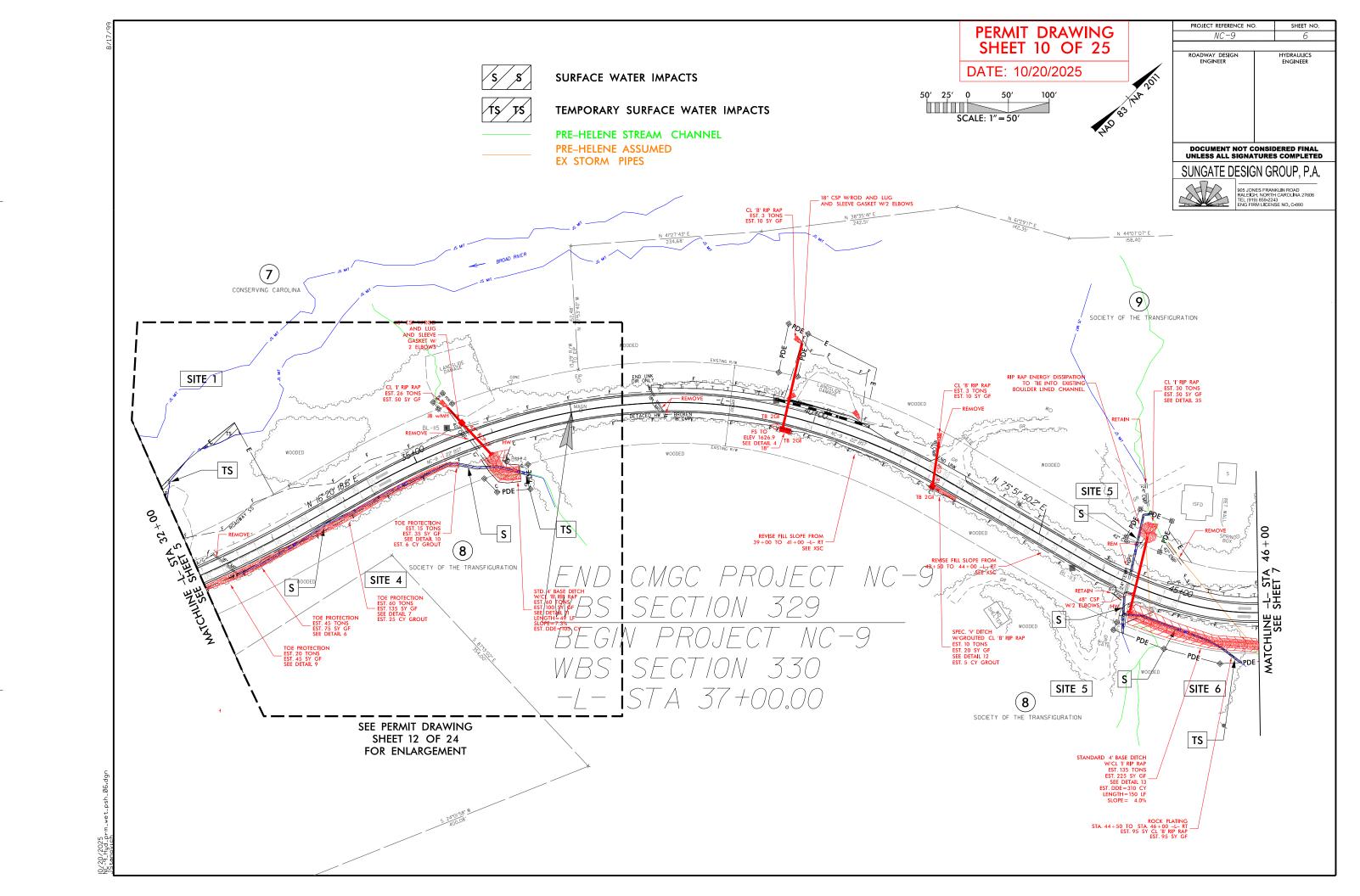


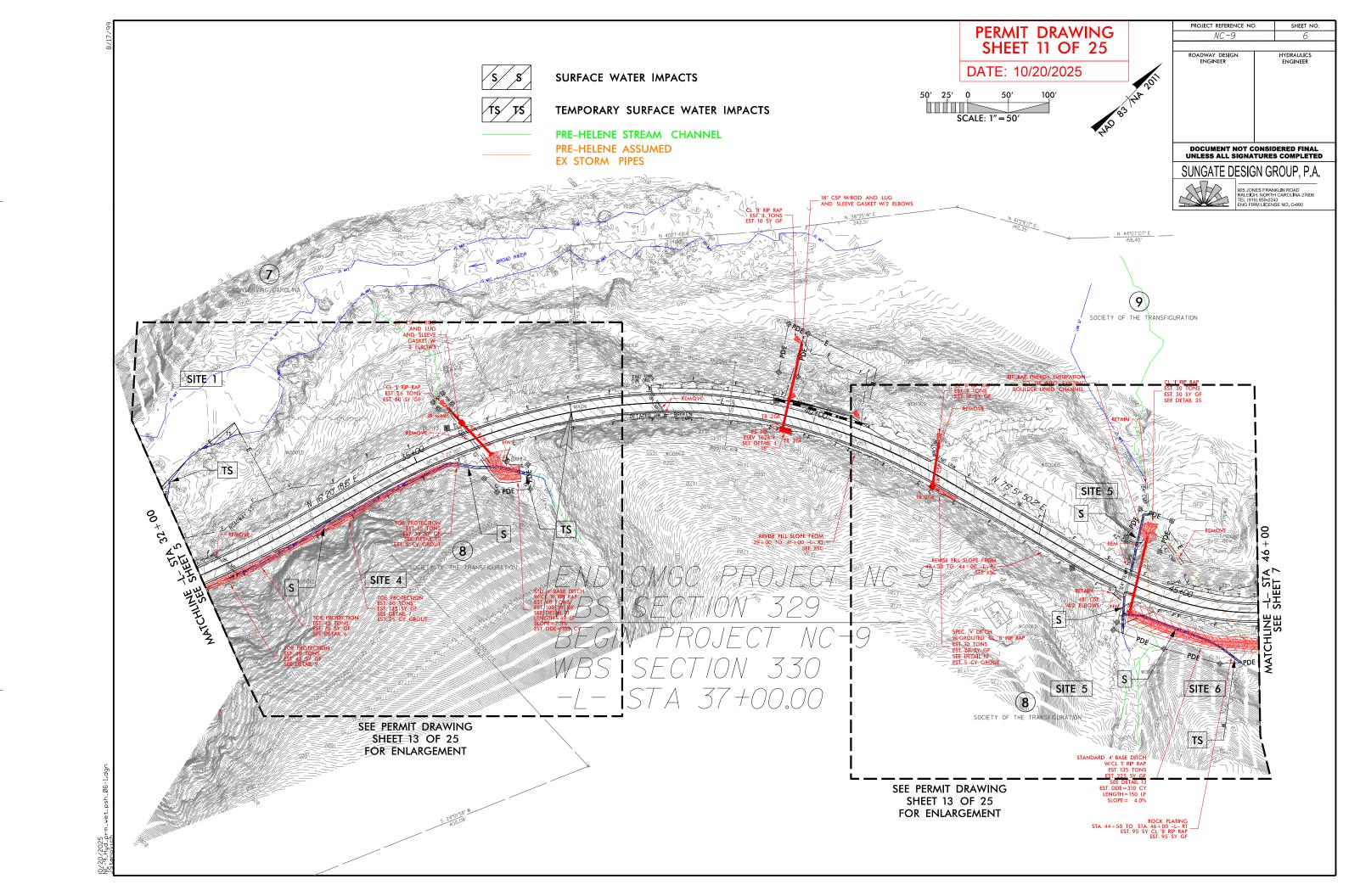


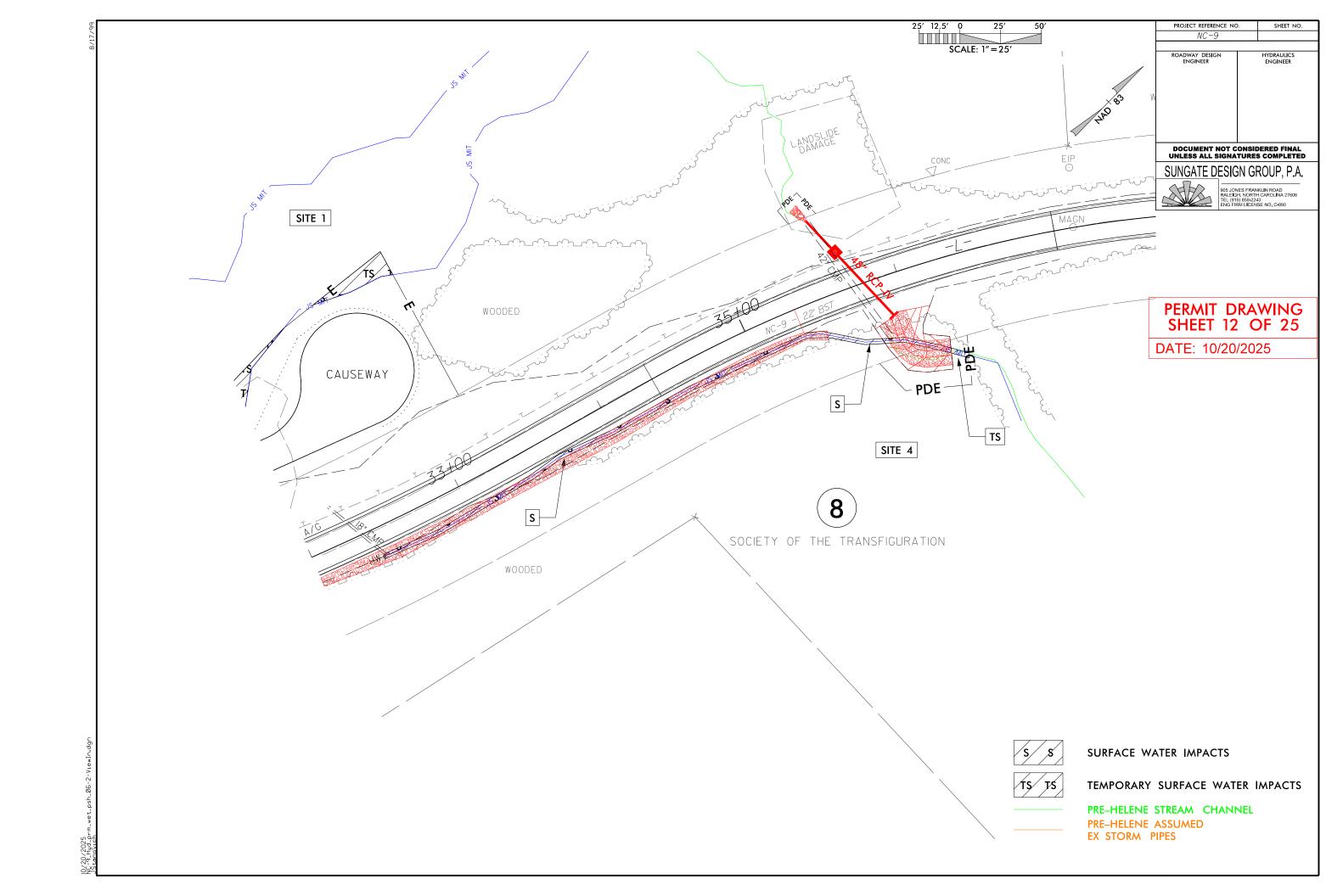
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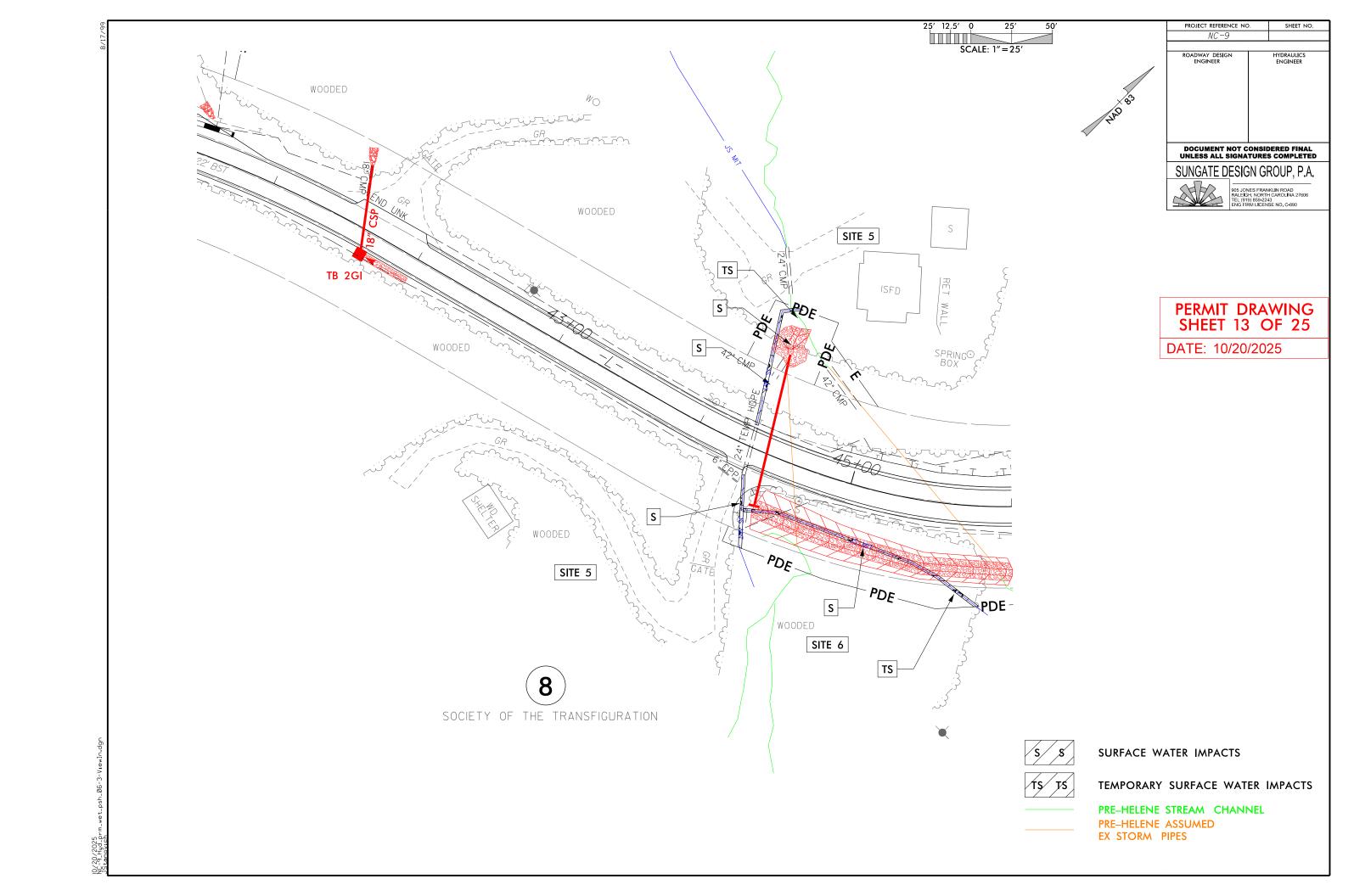


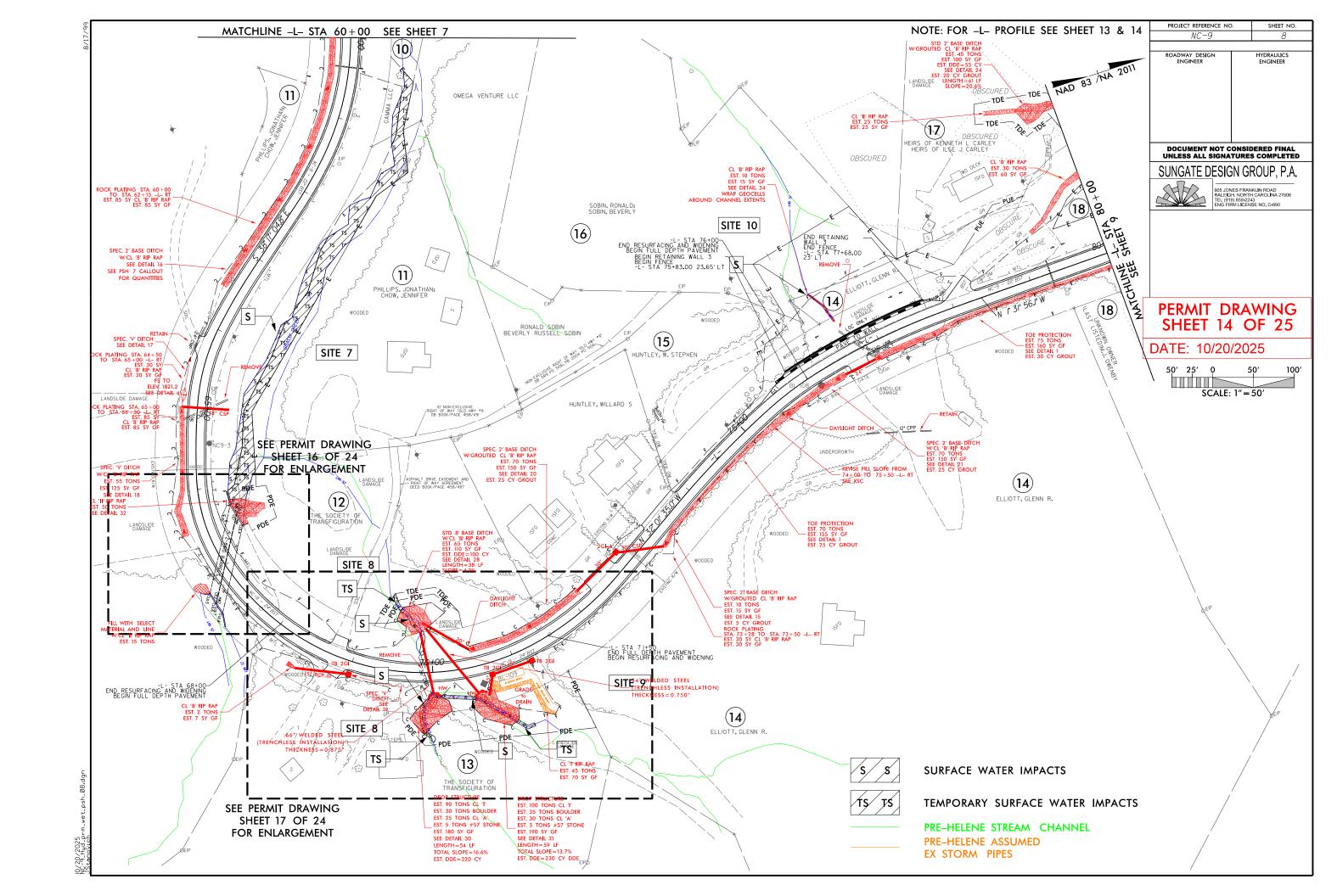


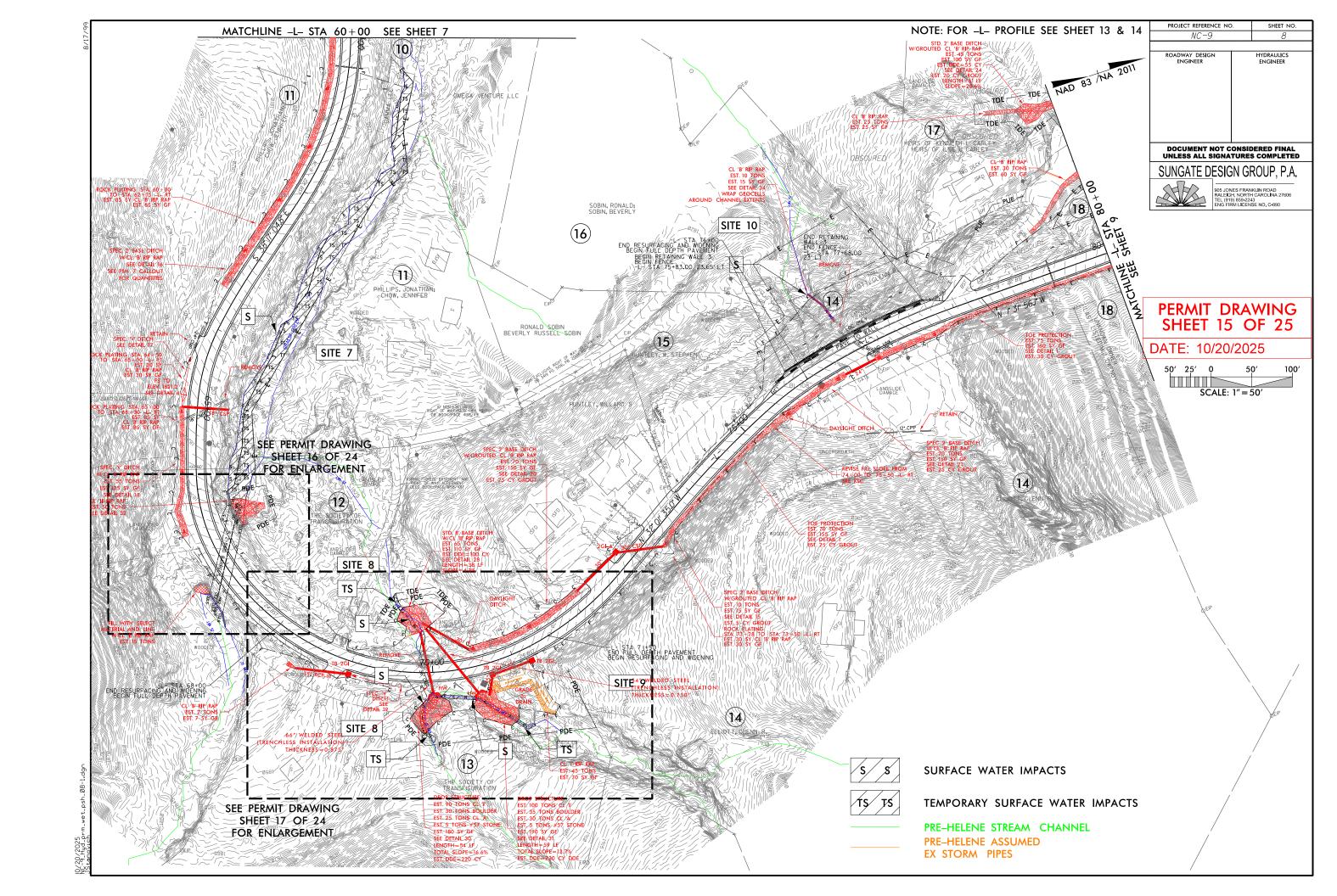


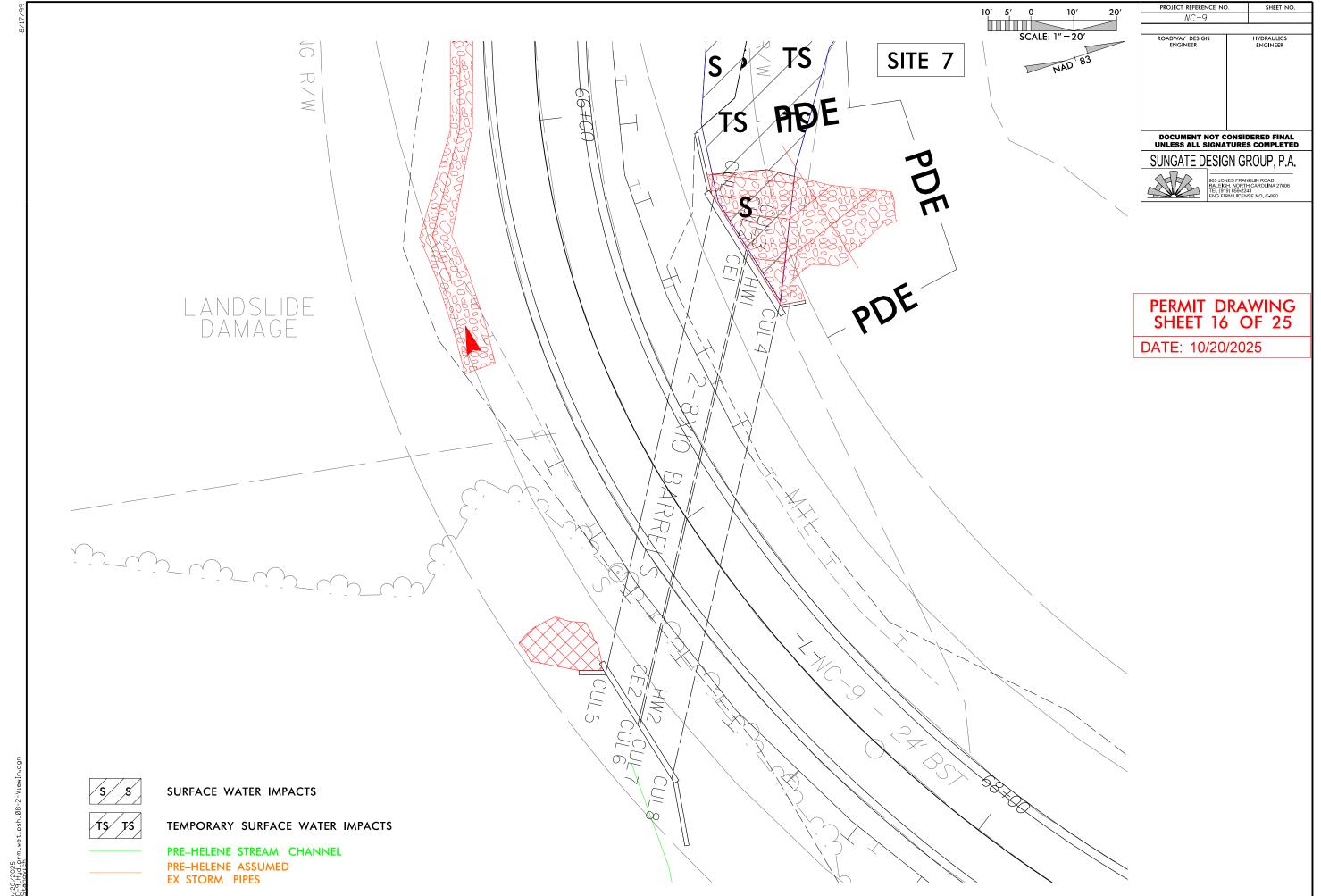






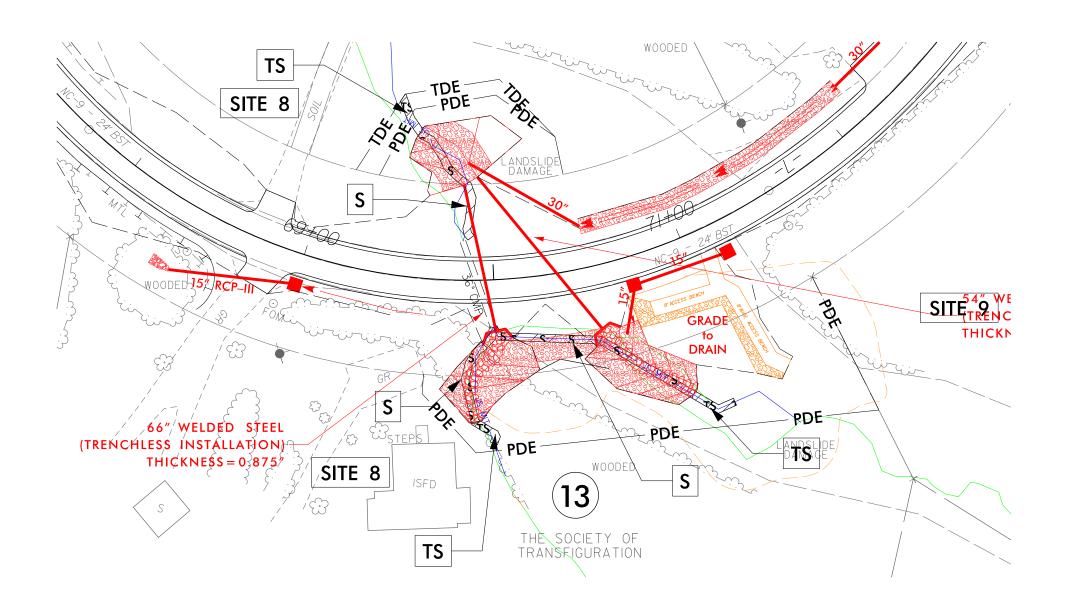






25' 12.5' 0 25' 50' SCALE: 1"=50'

PROJECT REFERENCE NO	. S	HEET NO.							
NC-9									
ROADWAY DESIGN ENGINEER		AULICS INEER							
905 JONES FRANKLIN ROAD RALEIGH, NORTH CAROLINA 27600 TEL (919) 859-2243									
	NC-9 ROADWAY DESIGN ENGINEER DOCUMENT NOT C UNLESS ALL SIGNA' SUNGATE DESIG	NC-9 ROADWAY DESIGN HYDR ENGINEER ENG BOCUMENT NOT CONSIDEREE UNLESS ALL SIGNATURES CON SUNGATE DESIGN GROU							



PERMIT DRAWING SHEET 17 OF 25

DATE: 10/20/2025

S/8

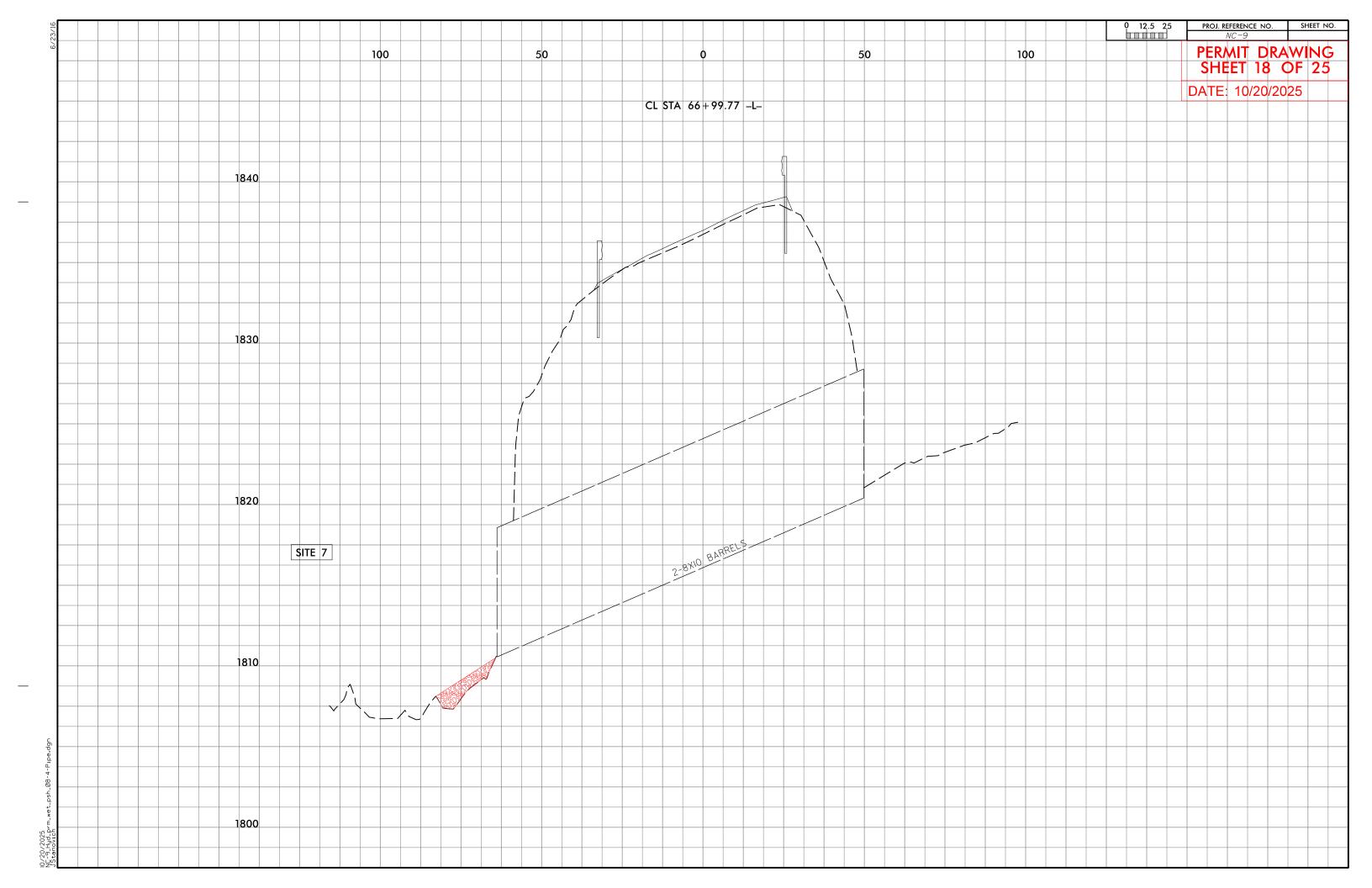
SURFACE WATER IMPACTS

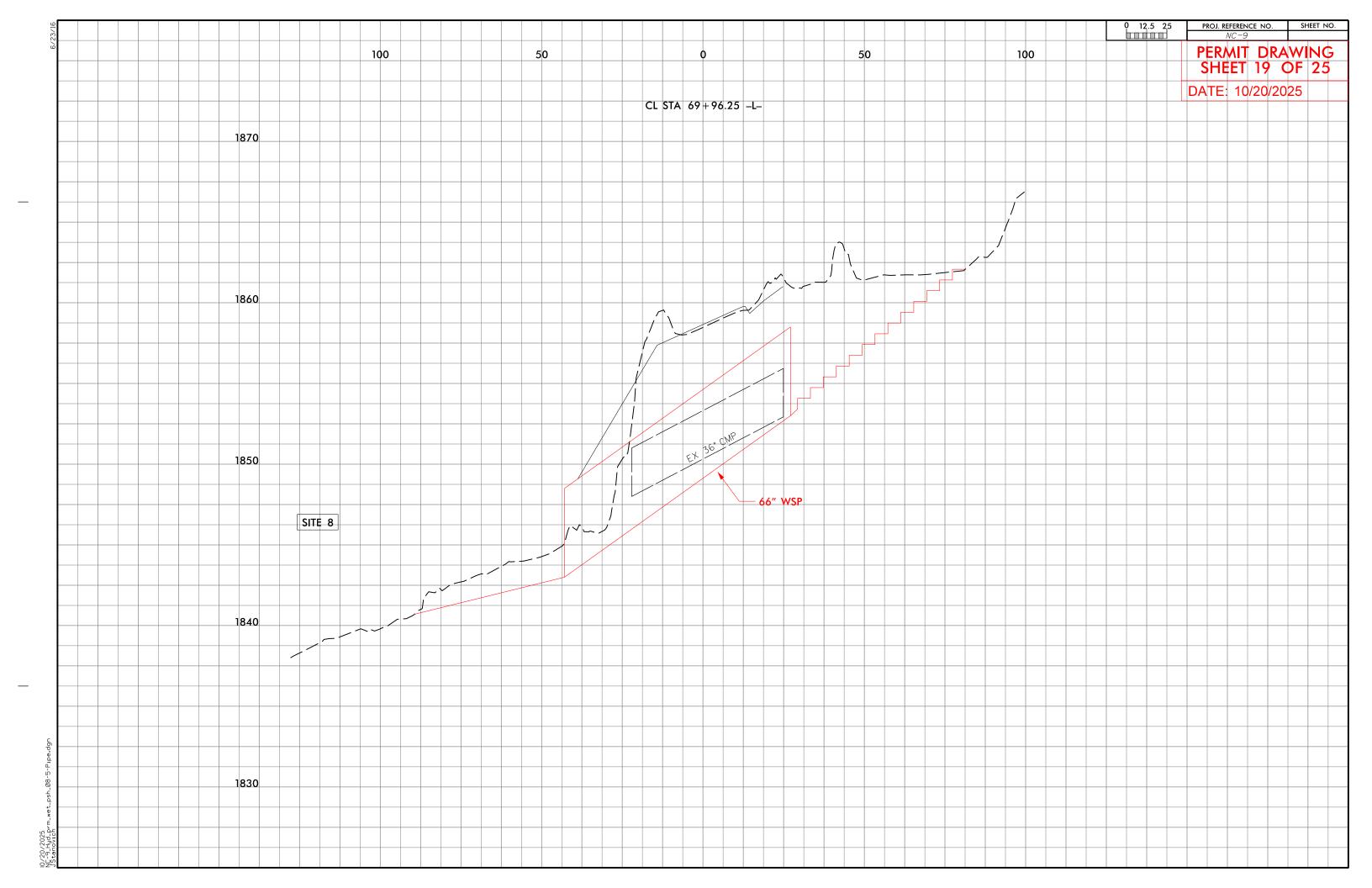
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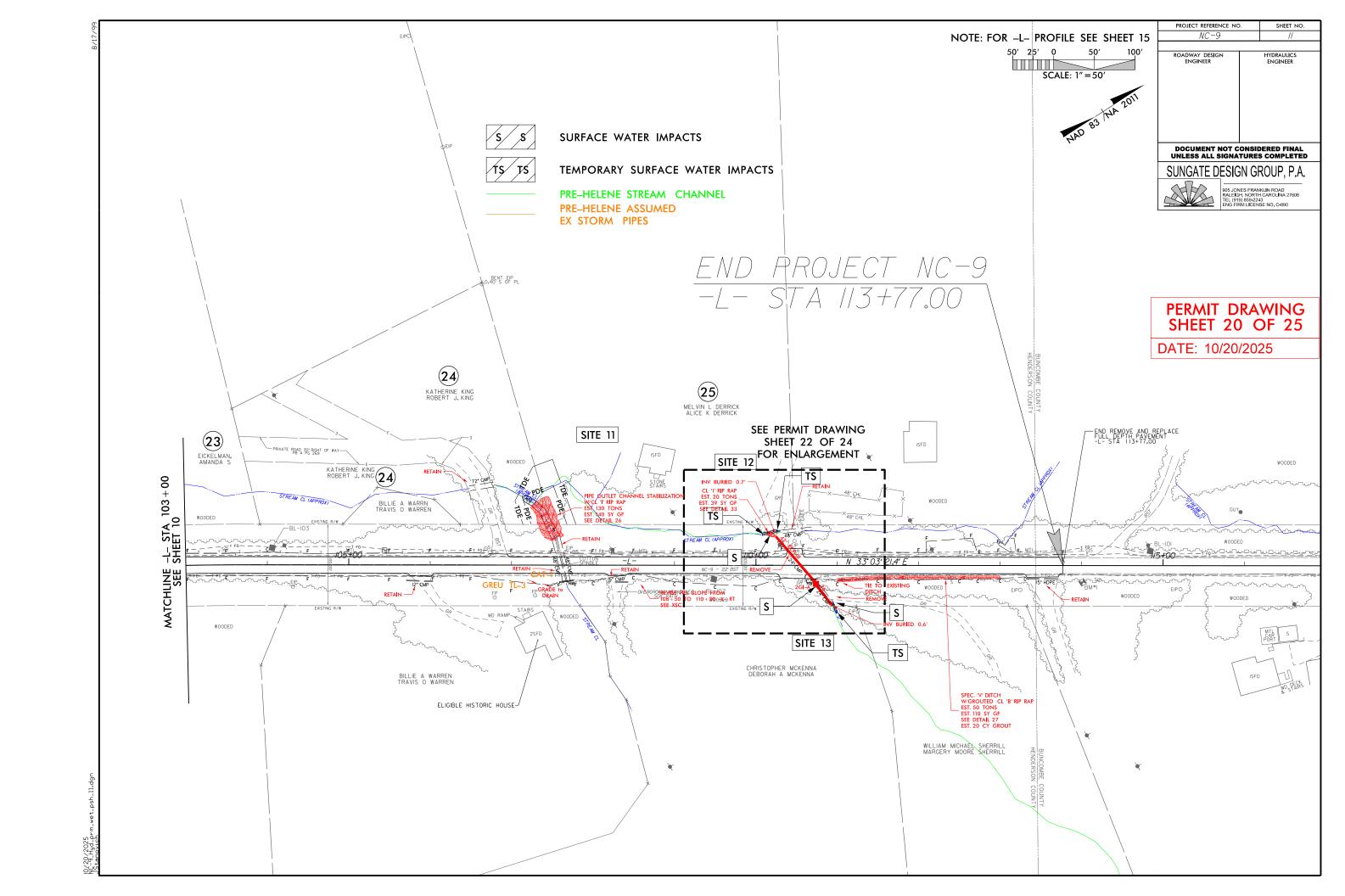
TEMPORARY SURFACE WATER IMPACTS

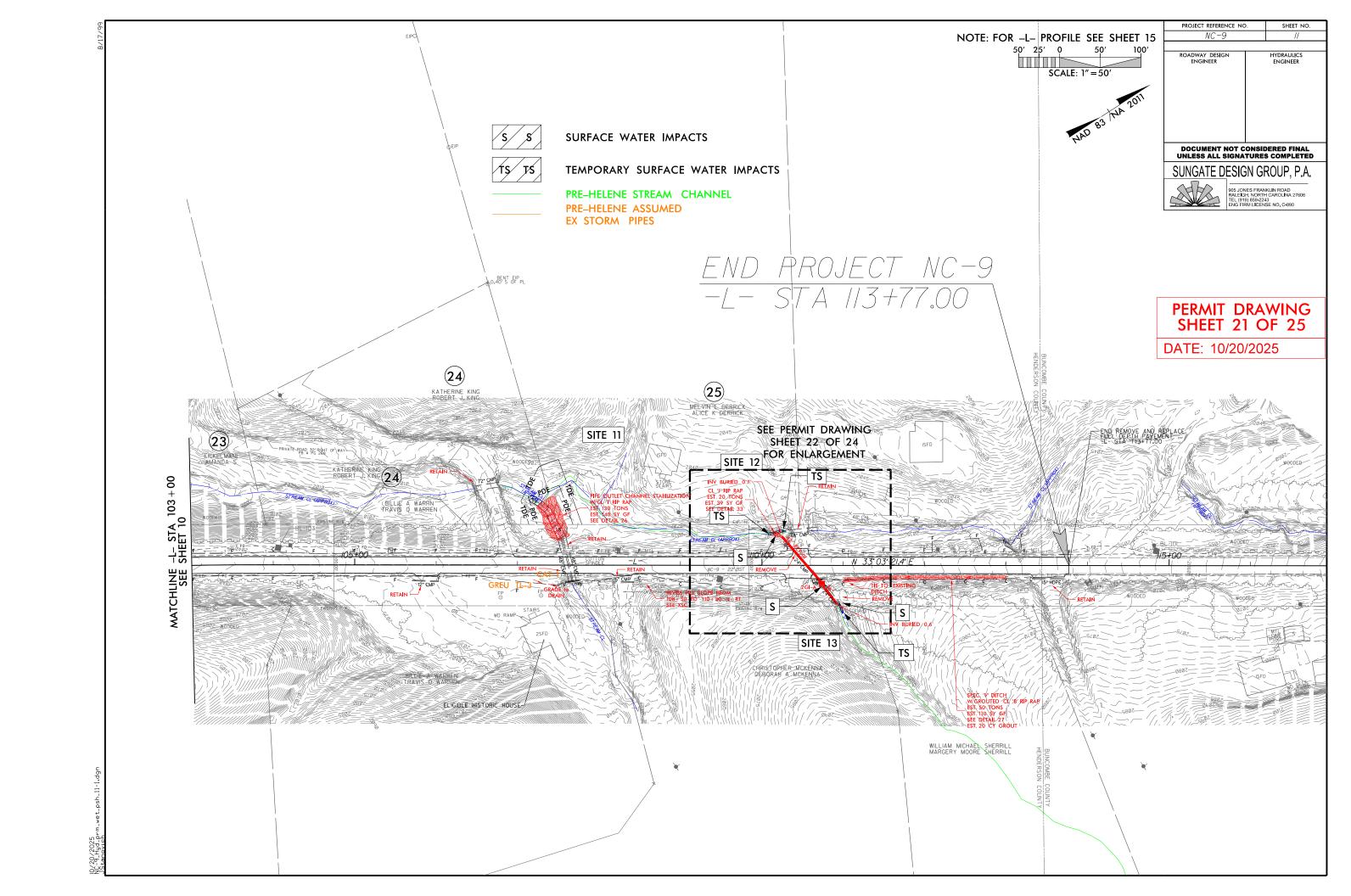
PRE-HELENE STREAM CHANNEL
PRE-HELENE ASSUMED
EX STORM PIPES

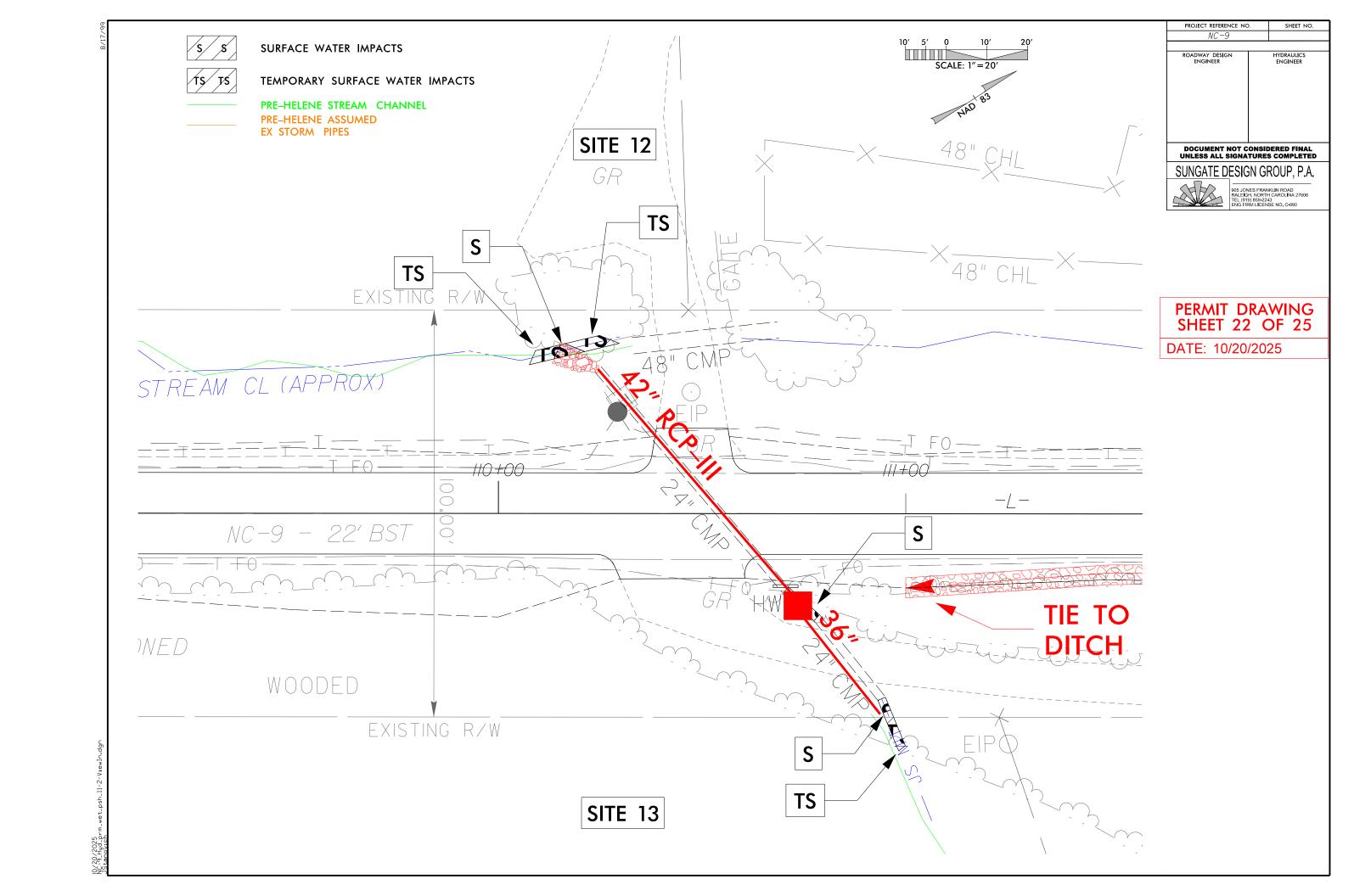
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			WETLAND AND SURFACE WATER IMPACT WETLAND IMPACTS					SURFACE WATER IMPACTS					
			Permanent	Temp.	Excavation	Mechanized	Hand Clearing	Permanent	Temp.	Existing Channel	Existing Channel	Natural	
Site	Station	Structure	Fill In	Fill In	in	Clearing	in	SW	SW	Impacts	Impacts	Stream	
No.	(From/To)	Size / Type	Wetlands	Wetlands	Wetlands	in Wetlands	Wetlands		impacts	Permanent	Temp.	Design	
			(ac)	(ac)	(ac)	(ac)	(ac)	(ac)	(ac)	(ft)	(ft)	(ft)	
1	10+40 to 33+27-L-LT	ROADWAY FILL							1.006		1166		
	12+01 to 29+83-L-LT	EXEMPT ROADWAY FILL						0.300		1129			
	12+49 to 14+25 -L- LT	STREAM MODIFICATION							0.058				
2	14+01 to 14+05-L-RT	ROADWAY FILL						0.001	0.001	15	12		
								0.00.	0.00				
3	17+10 to 19+98-L-RT	ROADWAY FILL						0.007	0.001	295	11		
4	32+41 to 36+29-L-RT	ROADWAY FILL						0.024	0.001	340			
		PIPE INLET						0.003		42	11		
SHEET T	OTALS*:		0.000	0.000	0.000	0.000	0.000	0.335	1.067	1821	1200	0	

^{*}Rounded totals are sum of actual impacts

NOTES:

The linear feet of temporary existing channel impacts not included for Site 1 Stream Modification due to already being accounted for under Site 1 Roadway Fill.

NC DEPARTMENT OF TRANSPORTATION
DIVISION OF HIGHWAYS
10-20-2025
HENDERSON COUNTY
NC-9
18314.4045135
SHEET 23 OF 25

Revised 2018 Feb

						RFACE WA	TER IMPA	CTS SUMN					
			WETLAND IMPACTS					SURFACE WATER IMPACTS					
			Permanent	Temp.	Excavation	Mechanized	Hand Clearing	Permanent	-	Existing Channel	Existing Channel	Natural	
Site	Station	Structure	Fill In	Fill In	in	Clearing	in	SW	SW	Impacts	Impacts	Stream	
No.	(From/To)	Size / Type	Wetlands	Wetlands		in Wetlands	Wetlands	impacts	impacts	Permanent	Temp.	Design	
5	44+36 to 45+21-L-RT	CHANNEL REPLACEMENT	(ac)	(ac)	(ac)	(ac)	(ac)	(ac) 0.001	(ac)	(ft) 26	(ft)	(ft)	
	44 100 to 45 12 1-L-1(1	PIPE INLET						0.001		19			
	44+14 to 44+33-L-LT	PIPE OUTLET						0.001		43			
	44114 (0 44133-1-11	CHANNEL REPLACEMENT						0.002		39			
		CHANNEL NEI LAGEIVIENT						0.002		39			
6	44+45 to 45+82-L-RT	DEWATERING							0.001		26		
		INLET CHANNEL BACKSLOPE						0.001		6			
		INLET CHANNEL RIP RAP						0.006		125			
7	60+34 to 66+62-L-LT	RIP RAP EMBANKMENT						0.052		379			
	60+34 to 66+62-L-LT	DEWATERING							0.194		207	1	
	66+21 to 66+62-L-LT	OUTLET RIP RAP						0.008		19			
8	69+84 to 70+01-L-RT	PIPE INLET						0.001		11			
		INLET CHANNEL RIP RAP						0.004		44			
		DEWATERING							0.002		17		
	69+42 to 69+91-L-LT	PIPE CULVERT						0.003		30			
		OUTLET CHANNEL RIP RAP						0.003		37			
		DEWATERING							0.002		20		
SHEET T	OTALS*:		0.000	0.000	0.000	0.000	0.000	0.084	0.199	778	270	0	

*Rounded totals are sum of actual impacts NOTES:

Site 5: Existing Pipe Culvert: 115 LF Site 6: Existing Pipe Culvert: 166 LF Site 8: Existing Pipe Culvert: 48 LF NC DEPARTMENT OF TRANSPORTATION
DIVISION OF HIGHWAYS
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HENDERSON COUNTY
NC-9
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				WETLAN	ID AND SU	RFACE WA	TER IMPA	CTS SUMN					
			WETLAND IMPACTS					SURFACE WATER IMPACTS					
Site No.	Station (From/To)	Structure Size / Type	Permanent Fill In Wetlands	Temp. Fill In Wetlands	in	Mechanized Clearing in Wetlands	Hand Clearing in Wetlands	Permanent SW impacts	Temp. SW impacts	Existing Channel Impacts Permanent	Existing Channel Impacts Temp.	Natural Stream Design	
			(ac)	(ac)	(ac)	(ac)	(ac)	(ac)	(ac)	(ft)	(ft)	(ft)	
9	70+01 to 70+86-L-RT	RESILIENCY						0.004		44			
		PIPE INLET						0.001		13			
	70+46 to 70+86-L-RT	INLET CHANNEL RIP RAP						0.005		56			
		PIPE INLET						0.001		2			
		DEWATERING							0.001		24		
10	76+27 to 76+64-L-LT	SUPPLEMENTAL RIP RAP						0.002		46			
11	107+13 to 107+59-L-LT	OUTLET RIP RAP						0.010		51			
		DEWATERING							0.003		16		
12	110+08 to 110+30-L-LT	OUTLET RIP RAP						0.001		4			
		DEWATERING							0.001		15		
13	110+93 to 111+00-L-RT	PIPE INLET						0.001		3			
	110+70 to 110+79-L-RT	DEWATERING PIPE OUTLET						0.001	0.001	10	10		
	TOTAL SHEET	23 OF 25						0.335	1.067	1821	1200		
	TOTAL SHEET	24 OF 25						0.084	0.199	778	270		
PROJEC	T TOTALS*:		0.000	0.000	0.000	0.000	0.000	0.445	1.272	2828	1535	0	

*Rounded totals are sum of actual impacts NOTES:

NC DEPARTMENT OF TRANSPORTATION
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