



STATE OF NORTH CAROLINA
DEPARTMENT OF TRANSPORTATION

MICHAEL F. EASLEY
GOVERNOR

LYNDO TIPPETT
SECRETARY

April 17, 2006

NC Department of Water Quality
585 Waughtown Road
Winston-Salem, NC 27107

ATTENTION: Ms. Sue Homewood
NCDOT Coordinator

Subject: **Modification to the Randleman Buffer Certification Application** for the High Point East Beltway, US 311 from south of US 29/70 to US 220, Guilford and Randolph Counties, State Project Nos. 8.1570601 and 8.1571501 Federal Aid Project No. MAF-F-119-1(1), TIP R-609IA, IB and R-2606A, B and C: Divisions 7 and 8, Work Center Nos. 34345.1.1 and 34480.1.1

Dear Ms. Homewood:

On February 28, 2006 the NCDOT submitted an application for a Randleman Buffer Certification for the above-mentioned project. The purpose of this letter is to correct discrepancies and omissions in the permit application already submitted. Please find attached to this application a utility impact drawing, a revised Randleman Variance Request, a revised Buffer Summary Sheet for section R-609IB, and a revised EEP confirmation letter. Revisions to the original buffer certification request are summarized below.

- The project will require the relocation of an existing sewer line on R-609IA at Station 18+80-L-. The relocation will result in the 182 ft² of impacts to Zone 1 and 445 ft² of impacts to Zone 2.
- The site numbers have been revised on the Buffer Summary Sheet for R-609IB to correspond with the numbering on the Buffer Site Drawings. There are no changes to the reported impacts.
- As discussed on the phone with Sue Homewood, the enclosed Randleman Variance Request Attachment has been updated to include the correct impact quantities numbers at each site.
- A typo on the original permit application incorrectly reported that Buffer Zone 2 impacts on R-609IA would be 353,348 ft². The correct impacts to Zone 2 will be

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PROJECT DEVELOPMENT AND ENVIRONMENTAL ANALYSIS
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WEBSITE: WWW.NCDOT.ORG

LOCATION:
2728 CAPITAL BLVD
PARKER LINCOLN BUILDING, SUITE 240
RALEIGH NC

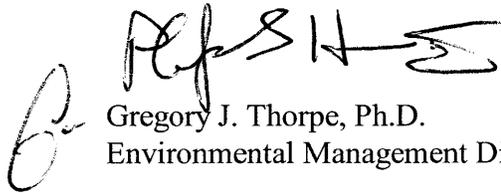
353,384 ft². An EEP confirmation letter for the additional 36 ft² of Buffer impacts is enclosed with this letter.

Regulatory Approvals

The NCDOT request that the DWQ amend the original buffer application to include the above-mentioned supplemental information. A copy of this letter will be posted on the DOT website at: <http://www.ncdot.org/doh/preconstruct/pe/neu/permit.html>

If you have any questions or need additional information, please contact Brett Feulner at (919) 715-1488.

Sincerely,

A handwritten signature in black ink, appearing to read 'G. Thorpe', is written over a circular stamp. The stamp contains the text 'Gregory J. Thorpe, Ph.D. Environmental Management Director, PDEA'.

Gregory J. Thorpe, Ph.D.
Environmental Management Director, PDEA

w/ attachment

Mr. John Hennessy, NCDWQ
Mr. Richard Spencer, USACE
Mr. Gary Jordan, USFWS
Mr. Travis Wilson, NCWRC
Mr. Greg Perfetti, P.E., Structure Design
Mr. David Chang, P.E., Hydraulics
Mr. J.M. Mills, P.E., Division 7 Engineer
Mr. Jerry Parker, Division 7 Environmental Officer
Mr. Mark Staley, Roadside Environmental

w/o attachment

Mr. Jay Bennett, P.E., Roadway Design
Mr. Majed Alghandour, Programming and TIP
Mr. Mike Penney, PDEA
Mr. Scott McLendon, USACE, Wilmington
Ms. Beth Harmon, EEP
Mr. Todd Jones, NCDOT External Audit branch
Mr. Art McMillan, PE, Highway Design

“General” Major Variance Application for Randleman Buffer Rules

PART 1: GENERAL INFORMATION

7-Streams Impacted

Classifications of the streams are included in the table below along with the corresponding site numbers. Unnamed tributaries receive the same classification as the stream that they flow into.

Stream Classification and Corresponding Site Number

Stream Name	NCDWQ Classification	Sites
Mile Branch	WS-IV	R-609IA 1-5
Richland Creek	WS-IV-CA	R-609IA 6-11
Taylor Branch	WS-IV	R-609IB 1-7
Muddy Creek	WS-IV	R-2606A 1
Muddy Creek	WS-IV-CA	R-2606A 2-6

PART 2: PROPOSED ACTIVITY

Contained below is the information requested in Part 2 of the Randleman General Major Variance Application Form. Information is provided on a site by site basis.

The NCDOT proposes to construct the ultimate roadway design for the US 311 Bypass/ High Point East Belt. The projects for which the variance is requested is TIP No. R-609 IA, IB, and R-2606A. The western terminus of this project begins at existing US 311 at US 29/70 and the western terminus will ultimately tie into US 220 South of Randleman.

NCDOT has not completed final avoidance and minimization analysis for R-2606B, therefore we would not be able to submit a complete Variance application on this section of the project at this time. NCDOT will apply for the General Major Variance for section R-2606B after final design, when the Clean Water Act permit modification is submitted for this section, prior to any construction. Per the request of NCDWQ, mitigation will be requested now for R-2606B based on preliminary impact numbers. R-2606C is not located within the Randleman Lake Watershed, therefore not subject to the Randleman Buffer rules.

Sites Requiring a General Major Variance

There are 22 areas that will require the issuance of the General Major Variance. The 22 sites will result in impacts to riparian buffers on five named streams or their unnamed tributaries.

It would not be feasible to construct the proposed project such that total avoidance of stream buffer impacts would occur. Impacts to stream buffers have been minimized to the maximum extent practical through the use of NCDOT and NCDENR Best Management Practices as well as the use of on-site stormwater management facilities. NCDOT requests that the NCDWQ issue a General Major Variance for the following sites.

R-609IA Buffer Site 1 (47,275 ft² of Buffer Impacts requiring mitigation)

Site 1 involves the crossing of an Unnamed Tributary to Mile Branch. The road has been aligned to minimize impacts to the riparian buffer. Sheet flow cannot be accomplished prior to entering the buffer at this crossing due to steep topography and the length required for a level spreader to accomplish sheet flow would be greater than 300 feet. However, flow is treated by grass swales prior to the grass swales entering the buffer.

R-609IA Buffer Site 2 (40,617 ft² of Buffer Impacts requiring mitigation)

Site 2 involves the crossing of an Unnamed Tributary to Mile Branch. The road has been aligned to minimize impacts to the riparian buffer. Sheet flow cannot be accomplished prior to entering the buffer at this crossing due to steep topography and the length required for a level spreader to accomplish sheet flow would be greater than 300 feet. However, flow is treated by grass swales prior to the grass swales entering the buffer.

R-609IA Buffer Site 3 (41,881 ft² of Buffer Impacts requiring mitigation)

Site 3 involves the relocation of existing Jackson Lake Road to the east and will result in impacts to the riparian buffer of Mile Branch and an Unnamed Tributary of Mile Branch. Currently Jackson Lake Road crosses Mile Branch with a 30-foot long bridge. The existing bridge will be replaced with a bridge that spans the creek and the buffer. The new roadway will also impact the buffers associated with the UT of Mile Branch. Sheet flow cannot be accomplished prior to entering the buffer at this crossing due to steep topography and the length required for a level spreader to accomplish sheet flow would be greater than 300 feet. However, flow is treated by grass swales prior to the discharging into the buffer.

R-609IA Buffer Site 5 (16,896 ft² of Buffer Impacts requiring mitigation)

Site 5 involves the crossing of an intermittent Unnamed Tributary to Mile Branch. The road has been aligned to minimize impacts to the riparian buffer. Sheet flow cannot be accomplished prior to entering the buffer at this crossing due to steep topography and the length required for a level spreader to accomplish sheet flow would be greater than 300 feet. However, flow is treated by grass swales prior to discharging into the buffer.

R-609IA Buffer Site 6 (55,207 ft² of Buffer Impacts requiring mitigation)

Site 6 involves the crossing of an Unnamed Tributary to Richland Creek by the main roadway as well as the relocated Dresden Road (SR 1156). The road has been aligned as close to perpendicular as possible to minimize impacts to the riparian buffer. Sheet flow cannot be accomplished prior to entering the buffer at this crossing due to steep topography and the length required for a level spreader to accomplish sheet flow would be greater than 300 feet. However, flow is treated by grass swales prior to discharging into the buffer.

R-609IA Buffer Site 7 (47,750 ft² of Buffer Impacts requiring mitigation)

Site 7 involves the crossing of a man made pond that drains to an intermittent Unnamed Tributary to Richland Creek. The road has been aligned to minimize impacts to the riparian buffer. Level spreaders cannot be used to accomplish sheet flow because the

length of level spreaders would be greater than 300 feet. However, flow is treated by grass swales prior to discharging into the buffer.

R-609IA Buffer Site 8 (459,747 ft² of Buffer Impacts requiring mitigation)

Site 8 involves the construction of the interchange between existing I-85 and the US 311 Bypass. Several Unnamed Tributaries to Richland Creek converge within the footprint of this interchange. Shifting the alignment to the south was not considered feasible because there is an existing interchange with I-85 and NC 62. Shifting the alignment to the north would have caused large impacts to the Richland Creek ecosystem. All streams impacted at this site are crossed by the road project, however due to length required for level spreaders to accomplish sheet flow and topography constraints, sheet flow cannot be used to accomplished except at Station Ramp B 13+60 -L-. Treatment of stormwater is accomplished through the combination of grass swales and gore areas between culverts.

R-609IA Buffer Site 9 (46,142 ft² of Buffer Impacts requiring mitigation)

Site 9 involves the crossing of an intermittent Unnamed Tributary to Richland Creek. The road has been aligned to minimize impacts to the riparian buffer. Sheet flow cannot be accomplished prior to entering the buffer at this crossing due to steep topography and the length required for a level spreader to accomplish sheet flow would be greater then 300 feet. However, flow is treated by an hazardous spill basin and Lateral V ditches prior to entering the buffer.

R-609IA Buffer Site 10 (10,991 ft² of Buffer Impacts)

Site 10 involves the impacts associated with the improvements to I-85 north of the interchange with the US 311 Bypass. The riparian buffer on the upstream portion of a manmade pond that drains to Richland Creek will be impacted at this site. Flow is treated at this site with Lateral V ditches prior to entering the buffer. The Randleman Buffer rules do not require mitigation at sites less then 1/3 of an acre, therefore no buffer mitigation will be required at this site because impacts are less then 1/3 of an acre.

R-609IA Buffer Site 11 (10,619 ft² of Buffer Impacts)

Site 11 involves the impacts associated with the improvements to I-85 north of the interchange with the US 311 Bypass. Buffer impacts to an Unnamed Tributary to Richland Creek will occur due to the extension of an existing pipe under I-85. Flow is treated at this site with Lateral V ditches prior to entering the buffer. Buffer mitigation will not be required at this site because impacts are less then 1/3 of an acre.

R-609IA Buffer Site 12 (37,929 ft² of Buffer Impacts)

Site 12 involves the impacts associated with the construction of the north-bound ramp at the I-85 interchange. Buffer impacts to a ponded Unnamed Tributary to Richland Creek will occur due to the extension of an existing pipe under I-85. Flow is treated at this site with Lateral V ditches prior to entering the buffer. Onsite buffer mitigation will compensate for 29,815 ft² of buffer impacts.

R-609IB Buffer Site 1 (97,954 ft² of Buffer Impacts requiring mitigation)

Site 1 involves the crossing of a pond and Unnamed Tributary of Taylor Branch. The road has been aligned to minimize impacts to the riparian buffer. Sheet flow cannot be accomplished prior to entering the buffer at this crossing due to steep topography and the length required for a level spreader to accomplish sheet flow would be greater than 300 feet. However, flow is treated by the use of an energy dissipator and grass swales prior to discharging into the buffer.

R-609IB Buffer Site 3 (53,589 ft² of Buffer Impacts requiring mitigation)

Site 3 involves the crossing of the upper portion of Taylor Branch. The road has been aligned to minimize impacts to the riparian buffer of Taylor Branch and has been aligned to avoid impacts to an Unnamed Tributary. Sheet flow cannot be accomplished prior to entering the buffer at this crossing due to steep topography and the length required for a level spreader to accomplish sheet flow would be greater than 300 feet. However, flow is treated by the use of grass swales prior to discharging into the buffer.

R-609IB Buffer Site 4 (50,675 ft² of Buffer Impacts requiring mitigation)

Site 4 involves the crossing of Taylor Branch. The road has been aligned to minimize impacts to the riparian buffer of Taylor Branch. Sheet flow cannot be accomplished prior to entering the buffer at this crossing due to steep topography and the length required for a level spreader to accomplish sheet flow would be greater than 300 feet. However, flow is treated by the use of a preformed scour hole and grass swales prior to discharging into the buffer.

R-609IB Buffer Site 5 (52,555 ft² of Buffer Impacts requiring mitigation)

Site 5 involves the crossing of an Unnamed Tributary of Taylor Branch. The road has been aligned to minimize impacts to the riparian buffer of the Unnamed Tributary. Sheet flow cannot be accomplished prior to entering the buffer at this crossing due to steep topography and the length required for a level spreader to accomplish sheet flow would be greater than 300 feet. However, flow is treated by the use of grass swales and is then run through pipes to the culvert that will be buried beneath the road.

R-609IB Buffer Site 6 (38,647 ft² Buffer Impacts requiring mitigation)

Site 6 involves the realignment of Tuttle Road (-Y9-). The relocation occurs near the convergence of Taylor Branch and an Unnamed Tributary of Taylor Branch. Currently Tuttle Road crosses Taylor Branch, and the fill slopes for Tuttle Road are within 50-feet of the UT to Taylor Branch. The UT to Taylor Branch flows into Taylor Branch upstream of the culvert that is located under Tuttle Road. Tuttle Road will be relocated to the south, the opposite direction of the UT to Taylor Branch. A bridge will be constructed over the new highway that will replace Tuttle Road in the current location. During construction of the new bridge, traffic will continue to use existing Tuttle Road.

Impacts to Taylor Branch are considered a road crossing and are treated using a level spreader, however a bypass device will be required at this site and diffuse flow will only be accomplished part of the time. Parallel impacts will occur to the Unnamed Tributary (UT) to Taylor Branch.

R-609IB Buffer Site 7 (28,585 ft² of buffer impacts requiring mitigation)

Site 7 involves the crossing of an Unnamed Tributary of Taylor Branch. The road has been aligned to minimize impacts to the riparian buffer of the Unnamed Tributary. Sheet flow cannot be accomplished prior to entering the buffer at this crossing due to steep topography and the length required for a level spreader to accomplish sheet flow would be greater than 300 feet. However, flow is treated by the use of grass swales prior to discharging into the buffer.

R-2606A Buffer Site 1 (21,051 ft² of buffer impacts requiring mitigation)

Site 1 involves the crossing of Muddy Creek. Buffer impacts have been minimized by building a bridge that spans the majority of the riparian buffer. Sheet flow cannot be accomplished prior to entering the buffer at this crossing due to steep topography and the length required for a level spreader to accomplish sheet flow would be greater than 300 feet. Stormwater is treated by the use of Hazardous Spill/ Dry Detention Basins prior to entering the buffer.

R-2606A Buffer Site 2 (46,319 ft² of buffer impacts requiring mitigation)

Site 2 involves the crossing of an Unnamed Tributary to Muddy Creek by the proposed bypass and a service road. Sheet flow cannot be accomplished prior to entering the buffer at this crossing due to steep topography and the length required for a level spreader to accomplish sheet flow would be greater than 300 feet. On the north side of the UT a Hazardous Spill basin and energy dissipator treat stormwater prior to entering the buffer. On the south side of the UT a dry detention basin and preformed scour hole treat the stormwater prior to entering the buffer.

R-2606A Buffer Site 3 (90,368 ft² of buffer impacts requiring mitigation)

Site 3 involves the crossing of an Unnamed Tributary to Muddy Creek by the proposed bypass. Sheet flow cannot be accomplished prior to entering the buffer at this crossing due to steep topography. On the north side of the UT a Hazardous Spill basin and a preformed scour whole treat stormwater prior to entering the buffer. On the south side of the UT preformed scour holes treat the stormwater prior to entering the buffer.

R-2606A Buffer Site 4 and 5 (141,200 ft² of buffer impacts requiring mitigation)

Site 4 and 5 involves the crossing of an unnamed tributary to Muddy Creek and the filling of a pond that drains to the UT. Sheet flow cannot be accomplished prior to entering the buffer at this crossing due to steep topography and the length required for a level spreader. On the west side (Site 4) of the UT a Hazardous Spill / Dry Detention Basin and a preformed scour hole will treat stormwater prior to entering the stream. On the east side of the UT (Site 5) a Hazardous Spill / Dry Detention Basin will treat flow and will be constructed in the location of an existing pond, within the existing buffer.

R-2606A Buffer Site 6 (191,212 ft² of buffer impacts requiring mitigation)

Site 6 involves the construction of an interchange with existing Cedar Square Road. This site involves the relocation of four stream segments, two of which contain inline ponds that drain to Muddy Creek.

The location of the interchange was deemed to be the most practical location and had the smallest amount of impacts to the human and natural environment. Shifting the interchange to the west was not feasible due to the impacts to the town of Glenola and shifting the alignment to the east would not result in decreased impacts. The construction of the interchange at Cedar Square Road allows local users in the area access to the US 311 bypass and regional users access to and from existing US 311 and the bypass.

Both ponds will require drainage because portions of the ponds will be covered by the proposed road project. Type A natural stream design will be used to ensure that the channels are stable. Natural channel design will be used on all four of the stream relocations and vegetated buffers will be established. Buffer replacement at this site totals 126,020 ft² (78,495 ft² in Zone 1 and 47,424 ft² in Zone 2).

Mitigation for Buffer Impacts

Buffer impacts within the Randleman Watershed require that mitigation for Zone 1 impacts be multiplied by 3 and Zone 2 impacts to be multiplied by 1.5. Mitigation for the entire project will total 3,659,112 ft². Onsite mitigation will account for 269,360 ft². The remaining mitigation of 3,389,752 ft² will be provided through the Ecosystem Enhancement Program.

Total Buffer impacts and Buffer Mitigation required for R-609 and R-2606

	Zone 1 (ft ²)	Zone 2 (ft ²)
Impacts Requiring Mitigation	1,396,741	867,609
Mitigation Required after Ratio	4,190,223	1,301,414
Total Mitigation Required	5,491,637	
Onsite Mitigation	102,036	
Offsite Mitigation Required	5,389,601	

Buffer Impacts Not Subject to a Variance

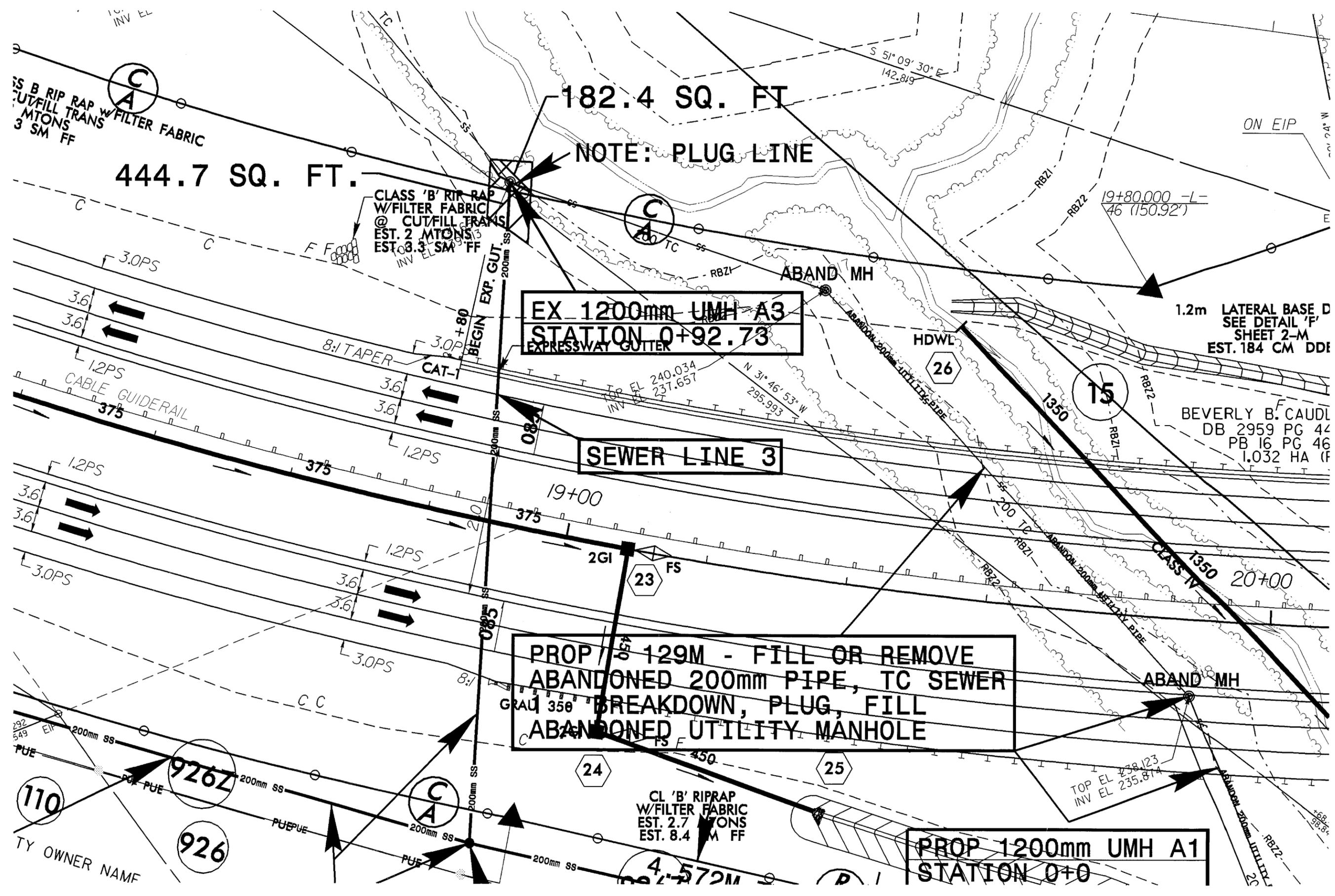
There are two sites that will not require a variance, however these sites still require review by NCDWQ for avoidance and minimization as well as no practical alternative analysis. These sites are described below

R-609IA Buffer Site 4 (125,792 ft² of Buffer Impacts)

Site 4 involves the crossing of Mile Branch. Natural channel design will be used to minimize impacts to the stream as well as restoring portions of a degraded stream. Details regarding the natural channel design can be found in the Wetland Permit Drawings (Wetland Site 6) on pages 55-65. Sheet flow will be accomplished at this site through the use of level spreaders, preformed scour holes, silt basins and hazardous (emergency) spill basins. Onsite stream mitigation will result in 72,221 ft² (43,513 ft² in Zone 1 and 28,708 ft² in Zone 2) of buffer mitigation.

R-609IB Buffer Site 2 (774 ft² of Buffer Impacts not requiring mitigation)

Site 2 includes the slight realignment of existing NC 62. Sheet flow will be accomplished through the use of a grass swale and a level spreader.



444.7 SQ. FT.

182.4 SQ. FT

NOTE: PLUG LINE

CLASS 'B' RIP RAP W/FILTER FABRIC @ CUT/FILL TRANS EST. 2 MTONS EST. 3.3 SM FF

EX 1200mm UMH A3 STATION 0+92.73 EXPRESSWAY GUTTER

SEWER LINE 3

PROP 129M - FILL OR REMOVE ABANDONED 200mm PIPE, TC SEWER BREAKDOWN, PLUG, FILL ABANDONED UTILITY MANHOLE

PROP 1200mm UMH A1 STATION 0+0

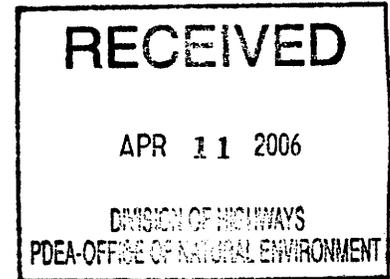
1.2m LATERAL BASE D SEE DETAIL 'F' SHEET 2-M EST. 184 CM DDE

BEVERLY B. CAUDL DB 2959 PG 44 PB 16 PG 46 1.032 HA (F)

CLASS 'B' RIP RAP W/FILTER FABRIC @ CUT/FILL TRANS EST. 2 MTONS EST. 3.3 SM FF

CL 'B' RIPRAP W/FILTER FABRIC EST. 2.7 MTONS EST. 8.4 M FF

TY OWNER NAME



April 11, 2006

Mr. Gregory J. Thorpe, Ph.D.
Environmental Management Director
Project Development and Environmental Analysis Branch
North Carolina Department of Transportation
1548 Mail Service Center
Raleigh, NC 27699-1548

Dear Dr. Thorpe:

Subject: EEP Mitigation Acceptance Letter:

R-0609IA/IB and R-2606A/B/C, US 311 Bypass (Future I-73/74),
Guilford and Randolph Counties

The purpose of this letter is to notify you that the Ecosystem Enhancement Program (EEP) will provide the required wetland and stream mitigation for the subject project. Based on the information supplied by you in letter dated February 10, 2006, the impacts are located in the Cape Fear and Yadkin River Basins of the Central Piedmont Eco-region (CP), and are as follows:

Cape Fear 03030003	Riverine Wetlands: 2.233 acres Non-Riverine Wetlands: 1.948 acres Stream: 19,821 feet
Yadkin 03040103	Riverine Wetlands: 0.21 acre Non-Riverine Wetlands: 0.033 acre Stream: 7,242 feet

This mitigation acceptance letter replaces the mitigation acceptance letter issued on February 24, 2006. The wetland and stream impacts referenced above are a combination of final and preliminary impact amounts. EEP understands as portions of the above projects are finalized, required wetland and stream mitigation amounts could increase or decrease.

Also, as indicated in your letter, this project will impact buffers located in CU 03030003 of the Cape Fear River Basin. The total buffer impacts are 1,396,741 square feet in Zone 1 and 867,945 square feet in Zone 2 with a total buffer mitigation requirement of 5,491,691 square feet. Approximately 102,036 square feet of the buffer mitigation will be completed within the existing right of way of the project. Therefore, EEP will commit to providing the remaining buffer mitigation need of 5,389,655 square feet. If the buffer impacts or the amount of mitigation required for this project increases, then this mitigation acceptance letter will no longer be valid and a new mitigation acceptance letter will be required.

Restoring... Enhancing... Protecting Our State

North Carolina Ecosystem Enhancement Program, 1652 Mail Service Center, Raleigh, NC 27699-1652 / 919-715-0476 / www.nceep.net



The NCDOT estimated buffer impacts in the 7-year Impact Projection Database submitted to EEP in May 2005. The buffer mitigation required for the NCDOT's impact projections was incorporated into EEP's biennial budget that was submitted to the NCDOT for approval in June 2005. All buffer mitigation requests and approvals are administered through the Riparian Buffer Restoration Fund. Any buffer impact associated with projects located in the Neuse, Tar-Pamlico, and portions of the Catawba and Cape Fear River Basins are automatic acceptances by the EEP, per the agreement with the NCDWQ.

The NCDOT will be responsible to ensure that the appropriate monetary compensation for the buffer mitigation will be provided in the agreed upon method of fund transfer. Upon receipt of the NCDWQ's Buffer Certification, the NCDOT will provide the EEP a copy of the Certification along with a letter verifying the buffer impact/mitigation amounts and requesting a fund transfer to provide the required compensation. The EEP will transfer funds from the MOA Account (Fund 2984) into the Riparian Buffer Restoration Fund (Fund 2982) and commit to provide the appropriate buffer mitigation to offset the impacts associated with this project.

Compensatory wetland and stream mitigation for this project will be provided in accordance with the Memorandum of Agreement between the North Carolina Department of Environment and Natural Resources, the North Carolina Department of Transportation, and the U. S. Army Corps of Engineers, signed on July 22, 2003 (Tri-Party MOA). EEP commits to implementing sufficient compensatory wetland and stream mitigation to offset the impacts with this project as previously listed by the end of the MOA Year in which this project is permitted, in accordance with Section X of the Tri-Party MOA. If the above referenced impact amounts are revised, then this mitigation acceptance letter will no longer be valid and a new mitigation acceptance letter will be required from EEP.

If you have any questions or need additional information, please contact Ms. Beth Harmon at 919-715-1929.

Sincerely,

A handwritten signature in black ink, appearing to read "James B. Gilmore, P.E.", written over a horizontal line.

William D. Gilmore, P.E.
EEP Director

cc: Eric Alsmeyer, USACE-Raleigh
John Hennessy, Division of Water Quality, Wetlands/401 Unit
File: R-06091A/IB and R-2606A/B/C (Revised)