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June 22, 2005 S&EC Project #6748.W5

Polk-Sullivan, LLC Attn: Mr. Robert Swain P.O. Box 5689 Cary, NC 27512

Re:

Buttercup Phacelia (Phacelia covellei) Impact

Williams Pond Property (± 500 acres) Chatham County, North Carolina

Dear Mr. Swain:

As previously discussed, a field review of the presence of the Buttercup Phacelia (Phacelia covellei) on the Williams Pond Property was completed earlier this year. An area estimated to be +/- 42 acres contains the species. This area was not surveyed or located using a GPS but was estimated during the field survey and sketched on the initial map sent with the report. The area that contains the species is predominately along the Haw River and portions of Pokeberry Creek as it enters the Haw. As stated in the conclusion section of our April 22, 2005 Report: "When found, the plant is very abundant, often becoming the dominant herbaceous species within the community. The species seems to prefer the moist and protected areas typically found within drainages and floodplains. The plant is very prolific along the southern portion of Pokeberry Creek and along the Haw River, in some cases extending all the way to the edge of abandoned agricultural fields."

Riparian buffers have been placed on the Haw River and Pokeberry Creek as well as the unnamed tributaries to Pokeberry Creek. Because the species primarily occurs within the alluvial areas on the property it is typically within the riparian buffers and therefore proposed impacts are minimal. As per our previous conversation and the information sent to me, proposed impacts will be to approximately 7 acres of area within the area designated to contain Buttercup Phacelia.

The 7 acres of disturbance account for approximately 16.6% of the total area that the plant occurs in. Also it is worth noting that individuals of the species typically are more numerous closer to the streams and floodplains and therefore less abundant further away from these alluvial areas. The proposed impact areas are in the furthest extremities of the buffers (i.e. farther from the streams and floodplains in areas where individuals are less numerous) and therefore are likely to impact fewer individuals of the species than the area percentage (16.6%) would seem to imply. In other words, although the proposed plan will impact approximately 16.6% of the population's area the plan will impact much less than 16.6% of the population on site. For this reason we do not believe that the proposed impacts to the individuals within this 7-acre area will account for a significant impact to the species overall.

Please call or email me at SClark@SandEC.com if you have any questions.

Sincerely,

Sean Clark

Environmental Scientist

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