



# FROEHLING & ROBERTSON, INC.

*Engineering Stability Since 1881*

310 Hubert Street  
Raleigh, North Carolina 27603-2302  
T 919.828.3441 | F 919.828.5751  
NC License #F-0266

July 31, 2015

Dan J. LaMontagne, P.E.  
Chatham County  
Public Works Director  
12 East Street  
Pittsboro, NC 27312

Re: **EIA Peer Review**  
**Sunset Grove Residential Development**  
Chatham County, North Carolina  
F&R Project No. 66T-0122

Dear Mr. LaMontagne:

Froehling & Robertson, Inc. (F&R) is pleased to present Chatham County with our comments related to reviewing the above Environmental Impact Assessment (EIA) with respect to the requirements listed in the Chatham County Subdivision Regulations (Regulations) as amended December 15, 2014. At this time additional discussion, supplemental information, and corrections are suggested for the EIA to be considered complete and to add clarity. Please see below for the complete list of comments.

## **PROJECT INFORMATION**

F&R understands the EIA was prepared by Timmons Group dated July 8, 2015. According to the EIA executive summary, "the proposed project will encompass three (3) contiguous parcels totaling approximately 107.85 acres and will consist of a subdivision containing single-family residences on 55 lots, with varying lot sizes, and 7,200 linear feet of public roadway. The subject property is bordered by single-family residences and Valley Lane to the north, undeveloped woodlands to the east, single-family residences and Bartlett Drive to the south, and single-family residences and Mt. Gilead Church Road to the west."

## **SCOPE OF WORK**

F&R has reviewed the EIA as well as Section 6.2 Additional First Plat Information of the Regulations and compared the required information/documentation with what is provided in the EIA. F&R has listed the specific regulation requirements as numbered/identified in the regulations with associated comments below. F&R has commented on both items needed to bring the EIA into accordance with the Regulations, as well as items needed for clarity or to add value to the EIA.



## COMMENTS

### **Proposed Project Description and Need**

- 2) Provide a project location map showing surrounding areas.
  - a. For the vicinity map provided in Appendix 1, change “Copper Ridge” to “Sunset Grove” to prevent confusion.
- 7) List square footage and height (in stories) of new buildings.
  - a. Section 3.3, page 4 states that no final design or siting plans have been developed and therefore, structural design details of single-family residences have not been identified.
- 8) Describe proposed uses of all buildings and proposed facilities.
  - a. There is no discussion in this section of whether or not there will be additional communal areas and their specific use (e.g. pool and/or other recreational facilities).
- 12) Show wastewater management systems on a map.
  - a. Section 3.3.2, page 5 states that each individual residential lot will have septic system for wastewater management; therefore, it is assumed that no map is necessary.

### **Existing Environment and Project Impacts**

#### 1) **Geography**

- Provide a topographic map of the property and surrounding area, use the county GIS website topography (2' contour interval) data at a scale appropriate for the project size, i.e., 1" = 100', etc.).
  - a. The EIA does not include a map derived from the county GIS website topography data. The Vicinity Map provided for in Appendix 1 is based upon USGS topography and not county GIS website topography.
- Show areas that will be graded or filled, and provide estimated cut/fill volumes.
  - a. Areas that will be graded or filled and their estimated cut/fill volumes are not shown.

#### 2) **Soils and Prime Farmlands**

- Discuss any soil constraints (fill, wetland soils, septic suitability, slopes, etc.), and indicate those areas on a map.
  - a. While the EIA shows soil maps and descriptions in Section 5.2 and Appendix 4, no discussion of soil constraints or soil constraint map are provided in EIA.
- If soil will be relocated, specify the number of square yards/feet to be moved, and its relocation site.
  - a. The number of square yards/feet of soil to be moved and its relocation site is not specified.



- Describe impacts to prime or unique farmland soils, including acreage estimates of lost farmland soils and retained farmland soils.

- a. The EIA does not adequately address the estimates of lost and retained farmland soils.

4) **Wetlands**

- Indicate whether wetlands are present, describe the basis for this determination and the identity of the person who made the determination.

- a. The EIA in Section 5.4.1, page 9 states that approximately 0.40 acres of headwater wetlands were identified but does not list the identity of person and/or company of the delineation.

- Show identified wetlands on a map, and describe all relevant details, such as acreage, types, delineation, function, etc.

- a. The 0.40 acres of headwater wetlands mentioned above are not shown in Appendix 2 or Appendix 6 Figures.

- If any diversions/additions/withdrawals of surface water will affect wetlands, describe those activities.

- a. Diversions/additions/withdrawals of surface water, or lacks thereof, are not discussed.

7) **Air Quality**

- Describe whether the project will increase odor levels, or the likelihood of odor complaints.

- a. Whether the project will increase odor levels or not, or the likelihood of odor complaints or not is not described.

10) **Surface and Groundwater Resources (discuss separately)**

- Include names, locations, classifications, and use support ratings for surface waters.

- a. This information is not provided in the EIA. It is recommended that a table displaying this information be used.

12) **Wildlife and Natural Vegetation**

- Describe and provide a map of natural community types on and adjacent to the site/project area.

- a. The EIA does not provide a description or map of natural communities. Section 5.12.2, page 12 as mentioned in cover letter only refers to Significant Habitats.



- List the species of dominant plants and animals observed on the site that typify those communities.

a. The EIA does not provide a list of dominant plants or animals observed on site. Section 5.12.3, page 12 as mentioned in cover letter only refers to Unique/Important Terrestrial Vegetation.

- Identify, list, and describe the distribution of the invasive species present on the site. Consult the NC Botanical Garden's Web page, "Plants to Avoid in the Southeast US" for a list of invasive species common to the region.

a. A list, description, and distribution of invasive species are not included.

- If forests will be cleared, discuss the extent of planned deforestation and specify the forestry methods to be used, including BMPs.

a. There is no discussion of the extent of planned deforestation or forestry methods to be used, including BMPs.

Exhibits (Maps, Figures, Tables, Photos, etc.)

a. The vicinity map in Appendix 1 should be changed from "Copper Ridge" to "Sunset Grove" as noted in Proposed Project Description and Need comments above.

State and Federal Permits Required

a. Section 5.14 page 12 does not mention NC Division of Water Resources 401 certification.

**LIMITATIONS**

Comments do not include additional assessment of any of the environmental categories listed in the EIA or verification of the information that was presented as accurate. Additional assessment services typically include but are not limited to; detailed surveys for traffic, air quality, noise, archaeological and cultural resources, threatened and endangered species; determinations of National Register eligibility; wetland delineations; and/or floodplain analysis including the 8 step process.

Please do not hesitate to contact F&R if you have any questions regarding our comments.

Respectfully Submitted,

**FROEHLING & ROBERTSON, INC.**

Gregory W. Price

Natural Resources Specialist

Elias N. Ruhl

Environmental Department Manager