

APPENDIX C
SPECIAL-STATUS SPECIES CORRESPONDENCE

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MAY 12 2003

SERIAL: BSEP 03-0084

Mr. Garland Pardue
Ecological Services Supervisor
Raleigh Field Office
U.S. Fish & Wildlife Service
P.O. Box 33726
Raleigh, NC 27636-3726

**BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
LICENSE RENEWAL - REQUEST FOR INFORMATION
LISTED SPECIES AND IMPORTANT HABITATS**

Dear Mr. Pardue:

Progress Energy Carolinas, Inc. (PEC) is preparing an application to the U.S. Nuclear Regulatory Commission (NRC) to renew the operating licenses for the Brunswick Steam Electric Plant (BSEP), which expire in 2016, for Unit 1 and 2014, for Unit 2. PEC intends to submit this application for license renewal in December 2004. As part of the license renewal process, the NRC requires license applicants to assess the impact of the proposed action on threatened or endangered species in accordance with the Endangered Species Act. The NRC will consult with the U.S. Fish and Wildlife Service under Section 7 of the Endangered Species Act and may also seek your assistance in the identification of important species and habitats in the project area. By contacting you in advance, we hope to identify any issues that need to be addressed or information required to expedite the NRC's consultation.

PEC has operated BSEP and associated transmission lines since 1975, when Unit 2 began commercial operation. Unit 1 began operating in 1976. BSEP is located in Brunswick County in southeastern North Carolina, near the mouth of the Cape Fear River. The plant is situated on approximately 1,200 acres of land. The facility includes the powerblock area and support facilities, the nuclear exclusion zone, a buffer zone, a three-mile long intake canal that is used to withdraw cooling water from the Cape Fear River, and a six-mile long discharge canal that conveys heated effluent to the Atlantic Ocean (i.e., see Figure 1).

PEC, previously known as Carolina Power & Light, Company built eight transmission lines to connect BSEP to the regional transmission system. All eight lines share the first 1.3 miles of corridor. At that point, the Whiteville, Delco East, Delco West, and Weatherspoon lines veer to the northwest, and divide again with the Whiteville line traveling parallel to and south of the Weatherspoon and Delco lines which share a

Brunswick Nuclear Plant
P.O. Box 10429
Southport, NC 28461

Mr. Garland Pardue
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corridor to the Delco Substation and then the Weatherspoon lines continues to the Weatherspoon Substation (i.e., see Figure 2). The Whiteville line crosses several pocosins and the Green Swamp; which has been designated a National Natural Landmark by the Department of the Interior. It passes approximately two miles west of Lake Waccamaw, and approximately one mile west of Lake Wacamaw State Park. The Weatherspoon and Delco lines both cross the Little Green Swamp.

The Wallace, Jacksonville, Castle Hayne East, and Wilmington Corning lines travel north from the split near BSEP. Approximately 15 miles north of BSEP, the Castle Hayne line moves east and then north to the Castle Hayne Substation. The other lines continue north, and then split after they cross into Pender County, with one line proceeding north to the Wallace Substation and the other line moving northeast to Jacksonville. The Jacksonville line crosses the northwest portion of the Holly Shelter Game Land in the Holly Shelter Swamp. The Wallace line crosses the B. W. Wells Savannah, a 117-acre remnant of wetland savannah, in northwest Pender County. This tract supports 170 native plant species, several of which are rare. PEC has entered into a partnership with the N. C. Coastal Land Trust, the Conservation Trust for North Carolina, and the N. C. Wild Flower Preservation Society to preserve this unique property.

PEC has no plans to significantly alter current operations over the license renewal period. Any maintenance activities necessary to support license renewal would be limited to previously-disturbed areas. No expansion of existing facilities is planned, and no additional land disturbance is anticipated in support of license renewal. As a consequence, PEC believes that operation of the plant, including maintenance of the transmission lines, over the license renewal period (i.e., an additional 20 years) would not adversely affect any threatened or endangered species.

PEC would appreciate a response to this letter, by June 15, 2003, providing any information you may have concerning listed species or ecologically-significant habitats that may occur on the 1,200-acre BSEP site, or along associated transmission corridors. This will enable PEC to meet the current application preparation schedule. PEC will include a copy of this letter and your response in the license renewal application to the NRC.

Mr. Garland Pardue
BSEP 03-0084 / Page 3

Please refer any questions regarding this submittal to Mr. Jan Kozyra, Lead Engineer - License Renewal, at (843) 857-1872.

Sincerely,

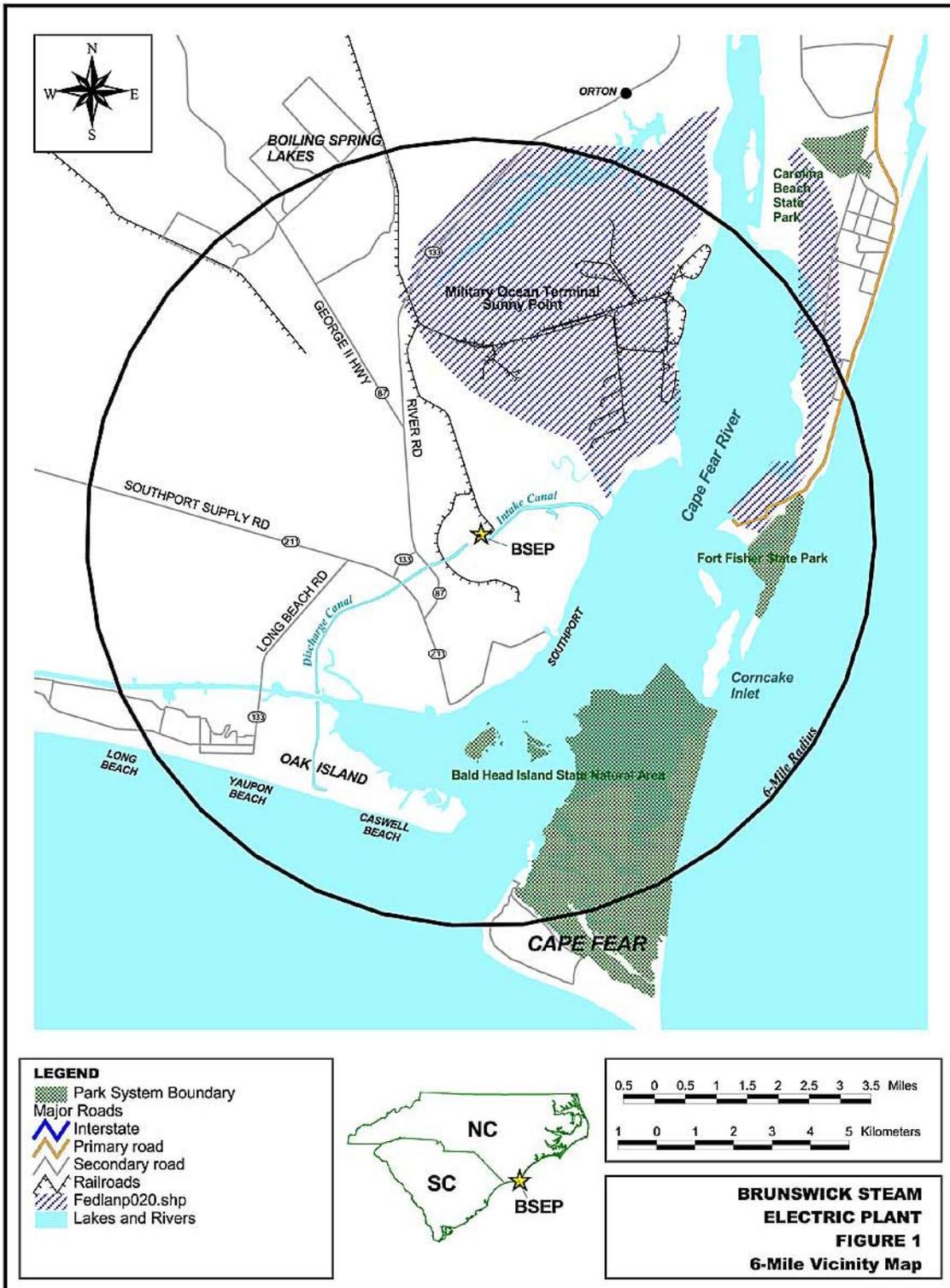


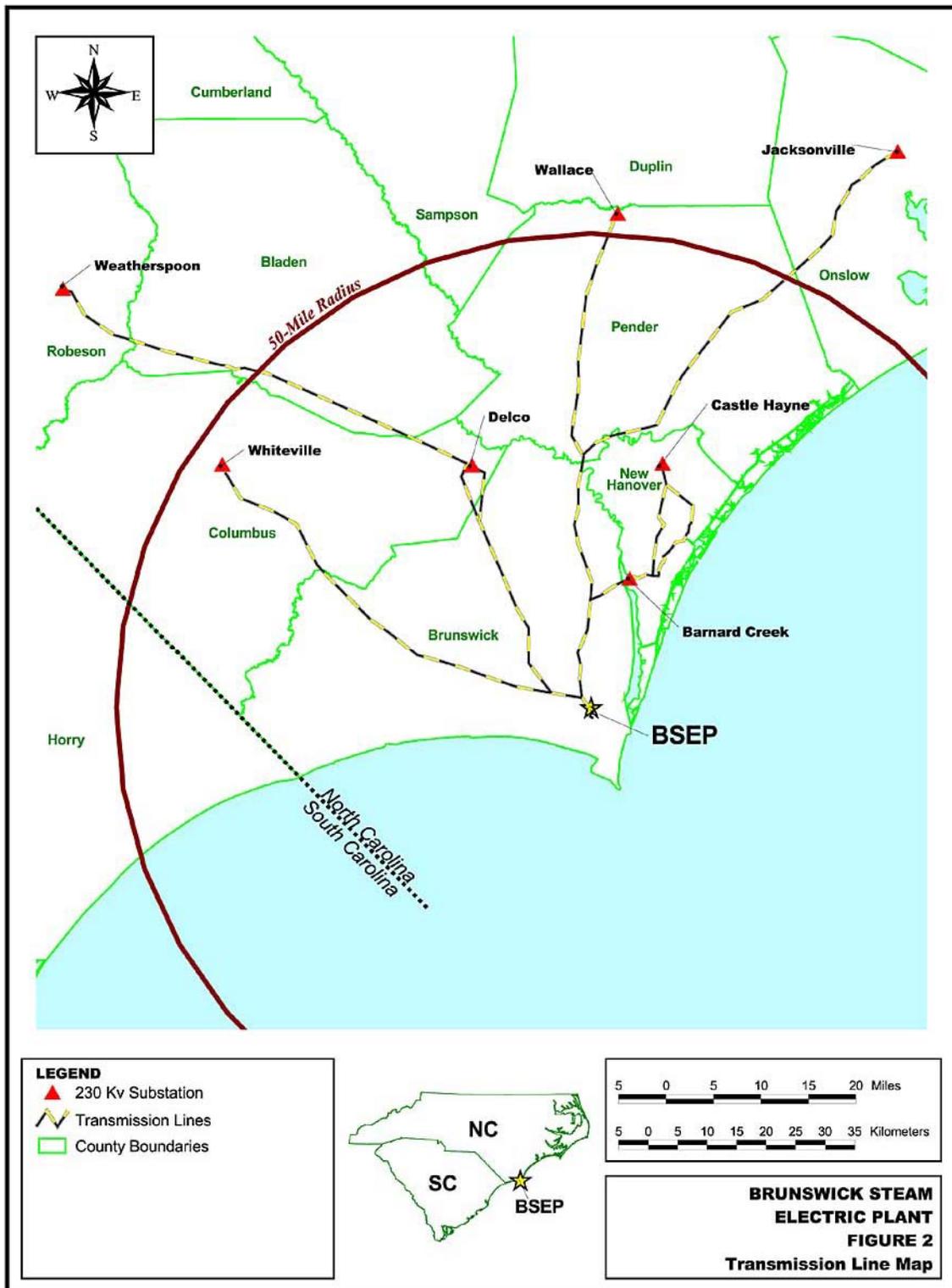
Edward T. O'Neil
Manager - Support Services
Brunswick Steam Electric Plant

MAT/mat

Enclosures:

- Figure 1 - Brunswick Steam Electric Plant 6-Mile Vicinity Map
- Figure 2 - Brunswick Steam Electric Plant Transmission Line Map







United States Department of the Interior

FISH AND WILDLIFE SERVICE

Raleigh Field Office
Post Office Box 33726
Raleigh, North Carolina 27636-3726

July 15, 2003

Edward T. O'Neil
Carolina Power and Light
Brunswick Nuclear Plant
P.O. Box 10429
Southport, NC 28461

Dear Mr. O'Neil:

Thank you for your May 12, 2003 letter requesting information from the U.S. Fish and Wildlife Service (Service) concerning the proposed license renewal for the Brunswick Steam Electric Plant (Unit Numbers 1 and 2). The Brunswick Steam Electric Plant is located near Southport in Brunswick County, North Carolina. Transmission lines radiate from the plant in Southport to various points in Columbus, Robeson, Pender, New Hanover and Onslow Counties. Our comments are provided pursuant to, and in accordance with, provisions of the Endangered Species Act of 1973, as amended (16 U.S.C. 1531 et seq.) (Act).

The Service is aware of various populations of federally protected plant species that occur in transmission line rights-of-way in southeastern North Carolina. Specifically, populations of rough-leaved loosestrife (*Lysimachia asperulaefolia*), Cooley's meadowrue (*Thalictrum cooleyi*), and golden sedge (*Carex lutea*) are known to occur in various CP&L power line rights-of-way in the counties mentioned above and specifically in the Jacksonville transmission line. Currently, there is a Memorandum of Understanding (MOU) (dated March 19, 1993) between Carolina Power and Light and the North Carolina Natural Heritage Program that addresses the management of these sites in order to protect the rare species that occur in them. In this MOU, CP&L agreed to "preserve and protect the special elements of natural diversity and natural areas which best exemplify the state's natural heritage which occur on their power line rights-of-way" by mowing only during the non-growing season and avoiding impact to the soil and hydrologic components of the natural area. The MOU states that herbicides will only be used selectively to supplement mechanical maintenance when woody or invasive species threaten the rare species or natural communities. In addition, CP&L agreed to notify the Natural Heritage Program when an emergency or operation has occurred which impacts a site. CP&L also agreed to notify the Natural Heritage Program if the right-of-way is sold or transferred, if threats to the natural area are observed by CP&L staff, or if management changes are anticipated.

Based on the information provided in your letter and the existing MOU, the Service believes that as long as CP&L continues to be an active participant in this MOU, the renewal of the license for

the Brunswick Steam Electric Plant (Unit Numbers 1 and 2) is not likely to adversely affect any federally-listed endangered or threatened species, their formally designated critical habitat, or species currently proposed for listing under the Act. We believe that the requirements of section 7(a)(2) of the Act have been satisfied. We remind you that obligations under section 7 consultation must be reconsidered if: (1) new information reveals impacts of this identified action that may affect listed species or critical habitat in a manner not previously considered; (2) this action is subsequently modified in a manner that was not considered in this review; or, (3) a new species is listed or critical habitat determined that may be affected by the identified action.

Thank you for your cooperation with our agency in protecting federally listed species. If you have any questions about our comments on this project, please contact Mr. Dales Suiter at (919) 856-4520, extension 18, or via email at Dale_Suiter@fws.gov.

Sincerely,

Dr. Garland Pardue
Ecological Services Supervisor

enclosure: Memorandum of Understanding

cc: North Carolina Natural Heritage Program (Jame Amoroso)

PARKS & RECREATION

Fax:9197153085

Jul 15 2003 17:16 P.01

Post-it* Fax Note	7671	Date	7-15-03	# of pages	3
To	Dale Switer	From	Sam Amstad		
Co./Dept.	USFWS	Co.	NC NHP		
Phone #		Phone #	715-8700		
Fax #	919 856 4556	Fax #			

ERSTANDING

between the

CAROLINA POWER AND LIGHT COMPANY

and the

N.C. DEPARTMENT OF ENVIRONMENT, HEALTH, & NATURAL RESOURCES

This agreement is made and entered into this 19th day of March, 1993, by and between the Carolina Power and Light Company (hereinafter referred to as CP&L) and the North Carolina Department of Environment, Health, and Natural Resources (hereinafter referred to as the Department).

Objectives:

WHEREAS CP&L, a public utility required to generate, transmit and distribute electric power, is strongly committed to the preservation of rare species and natural communities, and the hydrologic and disturbance regimes, such as flooding or fire, that maintain them; and

WHEREAS CP&L recognizes that:

- 1) the artificial disturbance, such as periodic mowing or hand-cutting, employed in powerline right-of-way maintenance can mimic natural disturbance regimes, such as flooding or fire, required by rare species and natural communities for survival,
- 2) certain rare species and natural communities are especially vulnerable to soil disturbance and to disruption of their hydrologic regime,
- 3) indiscriminate application of herbicides is harmful to most rare species and natural communities; and

WHEREAS the Department's Natural Heritage Program was created by the General Assembly of North Carolina to inventory and protect the special elements of natural diversity and natural areas which best exemplify the state's natural heritage; and

WHEREAS the protection strategies used by the Natural Heritage Program are threefold, as follows:

- 1) establishing a statewide system of registered natural areas and dedicated nature preserves,
- 2) promoting the awareness and involvement of the general public, private corporations, and agencies, in natural areas protection,
- 3) providing input to the private and public sector to assist them in land use planning that optimally has no impact on the special elements of natural diversity and natural areas which best exemplify the state's natural heritage; and

PARKS & RECREATION

Fax:9197153085

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P.02

WHEREAS, under existing provisions of law, the Department is authorized to enter into Agreements with public utilities;

WHEREAS, both parties recognize that the successful management of rare, threatened and endangered species, sensitive or exemplary natural communities and other significant natural features on public utility powerlines depends on close cooperation between said public utility and the Department's Natural Heritage Program.

NOW THEREFORE, in consideration of the above premises and in the interest of the mutual advantage in attainment of common objectives, the parties hereto desire to cooperate and mutually agree as follows:

Statements of Work:

A. To the best of its knowledge and ability, CP&L agrees to:

1. Preserve and protect the special elements of natural diversity and natural areas which best exemplify the state's natural heritage which occur on their powerline rights of way. "Preserve and protect" can be defined as managing each site according to the Natural Heritage Program's recommendations which usually include mowing only during the non-growing season and avoiding impact to the soil and hydrologic components of the natural area. Herbicide use in the vicinity of a rare species or unique natural area will be carefully managed in consultation with the Natural Heritage Program. Selective and specific herbicide applications may be needed to supplement mechanical maintenance when woody or invasive species threaten the rare species or natural communities.
2. Notify the Natural Heritage Program when an emergency or operational situation has occurred which impacts a site.
3. Notify the Natural Heritage Program if the right of way is sold or transferred, if threats to the natural area are observed by CP&L staff, or if management changes are anticipated. Ideally, notification should be well in advance of any anticipated change, to allow time for negotiation or other protection planning.

B. To the best of its knowledge and ability, the Department agrees to:

1. Provide CP&L with location and management information for the special elements of natural diversity and natural areas which best exemplify the state's natural heritage which occur on CP&L rights of way.
2. Provide CP&L with continued management information and information on rare species and natural communities, through periodic consultation and survey forms.
3. Include the natural areas identified as occurring on CP&L rights of way and protected under this Memorandum of Understanding in the North Carolina Natural Heritage Program Registry of Natural Areas.

C. It is further mutually agreed between the parties that:

PARKS & RECREATION

Fax:9197153085

Jul 15 2003 17:17

P.03

1. Nothing in this agreement shall be construed as obligating either the Department or CP&L to expend funds specifically for fulfillment of the statements of work.
2. Nothing herein contained shall be construed as limiting or affecting in any way the delegated authority of the Department or of CP&L in any way.

Key Contacts:

CP&L:

Ms. Brenda Brickhouse, Transmission Forester
Carolina Power & Light Company
6C3 Center Plaza Building
P.O. Box 1551
Raleigh, NC 27602 919/546-6782

Natural Heritage Program:

Ms. Ann Prince, Protection Specialist
North Carolina Natural Heritage Program
Division of Parks and Recreation
P.O. Box 27687
Raleigh, NC 27611-7687 919/733-7701

Conditions of Agreement:

This Memorandum of Understanding shall become effective when signed by both agencies and shall continue in force until terminated by either agency.

This Memorandum of Understanding may be terminated thirty (30) days after written notification by either party, or for due cause at any time.

Nothing in this Memorandum of Understanding shall be construed to place a financial commitment upon either of the parties.

SIGNATURES

CAROLINA POWER AND LIGHT COMPANY

APPROVED:


Lynn W. Eury, Executive Vice President-Power Supply

DEPARTMENT OF ENVIRONMENT, HEALTH, AND NATURAL RESOURCES

APPROVED:


Jonathan B. Howes, Secretary



MAY 1 2 2003

SERIAL: BSEP 03-0086

Mr. Robert Hoffman
Fishery Biologist
Endangered Species Team
Southeast Regional Office
National Marine Fisheries Service
9721 Executive Center Drive North
St. Petersburg, FL 33702

**BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
LICENSE RENEWAL - REQUEST FOR INFORMATION
THREATENED OR ENDANGERED MARINE SPECIES**

Dear Mr. Hoffman:

Progress Energy Carolinas, Inc. (PEC) is preparing an application to the U.S. Nuclear Regulatory Commission (NRC) to renew the operating licenses for the Brunswick Steam Electric Plant (BSEP), which expire in 2016, for Unit 1 and 2014, for Unit 2. PEC intends to submit this application for license renewal in December 2004. As part of the license renewal process, the NRC requires license applicants to assess the impact of the proposed action on threatened or endangered species in accordance with the Endangered Species Act. The NRC will request an informal consultation with your office, at a later date, under Section 7 of the Endangered Species Act. By contacting you early in the application process, we hope to identify any issues that need to be addressed or information required to expedite the NRC's consultation.

PEC has operated BSEP and associated transmission lines since 1975, when Unit 2 began commercial operation. Unit 1 began operating in 1976. BSEP is located in Brunswick County in southeastern North Carolina, near the mouth of the Cape Fear River (i.e., see Figure 1). The plant is situated on approximately 1,200 acres of land. PEC, previously known as Carolina Power & Light Company, built eight, 230 kV transmission lines to connect BSEP to the regional transmission system (i.e., see Figure 2).

Under full power operation, as much as 1.05 million gallons per minute (i.e., 2,335 cubic feet per second) of water is withdrawn from the Cape Fear River via a three-mile long intake canal for condenser cooling. After passing through the plant's condensers, the heated water travels through a six-mile long discharge canal to Caswell Beach before being pumped 2,000 feet offshore through a pair of 13-foot diameter underwater pipes that extend into the

Brunswick Nuclear Plant
P.O. Box 10429
Southport, NC 28461

Mr. Robert Hoffman
BSEP 03-0086 / Page 2

Atlantic Ocean along the ocean floor. Although some of the waste heat is radiated to the atmosphere from the surface of the discharge canal, the bulk of the heat is dissipated by mixing with cooler Atlantic Ocean water. Cooling water flow (i.e., withdrawal) rates and heat rejection rates, defined by water temperatures in the area of the ocean discharge, are limited by the provisions of National Pollutant Discharge Elimination System (NPDES) Permit Number NC0007064, issued on September 19, 2000, by the North Carolina Department of Environment and Natural Resources, Division of Water Quality.

One federally listed anadromous fish species and five federally listed sea turtle species are known to occur off the North Carolina coast. Once plentiful, the Cape Fear River population of shortnose sturgeons (*Acipenser brevirostrum*) has been reduced to perhaps 50 individuals. No shortnose sturgeons have been captured by PEC biologists in more than 25 years of monitoring fish populations in the area of BSEP.

Although five sea turtle species may be found in the Cape Fear area, only three (i.e., the loggerhead turtle, *Caretta caretta*; the green turtle, *Chelonia mydas*; and the Kemp's ridley turtle, *Lepidochelys kempii*) are observed in the vicinity of BSEP on a regular basis. These are also the only sea turtle species that have been taken at BSEP. The hawksbill turtle, *Eretmochelys imbricata*, is uncommon along the Atlantic coast, preferring coral reef areas of the Caribbean and Central America. The leatherback turtle, *Dermochelys coriacea*, is more pelagic in its habits than other sea turtles, and is rarely seen inshore in the Carolinas.

The National Marine Fisheries Service (NMFS) reviewed data on incidental takes of sea turtles at BSEP and the operation of the cooling water intake system and issued a final Biological Opinion, with an incidental take statement, in January 2000, that concluded:

...operation of the water intake system of the Brunswick Steam Electric Plant...is not likely to jeopardize the continued existence of the loggerhead, leatherback, green, hawksbill, or Kemp's ridley sea turtles. No critical habitat has been designated for these species in the action area; therefore, none will be affected. This conclusion is based on the proposed action's {operation of the cooling water intake system} anticipated effects on each of these species being limited to the incidental take, through death or injury, on a small number of immature sea turtles per year over the next 20 years.

In accordance with the terms and conditions of the January 2000, Biological Opinion, PEC continues to: (1) conduct daily sea turtle patrols in the intake canal area, including the diversion structure and trash racks, over the April-August period, and maintain a logbook with observations, (2) inspect and maintain the diversion structure to ensure it is working as designed, (3) capture, photograph, treat (i.e., as appropriate), and relocate any turtles found in the canal in consultation with the North Carolina Sea Turtle Coordinator, (4) maintain detailed records on disposition of turtles found dead or alive, and (5) submit an annual report

Mr. Robert Hoffman
BSEP 03-0086 / Page 3

to NMFS with particulars on each sea turtle taking, including species, size, date, and disposition of each individual.

PEC is committed to the conservation of natural habitats and protected species, and expects that operation of the plant through the license renewal period (i.e., an additional 20 years) would not jeopardize the population of any listed marine species. PEC has no plans to significantly alter current operations over the license renewal period. No expansion of existing facilities is planned, and no additional disturbance is anticipated in support of license renewal, beyond some limited dredging that might be necessary in the area of the plant intake. PEC would obtain the necessary approvals and permits, if required, from the agencies that regulate these activities before dredging.

Please provide a letter detailing any concerns you may have about any listed species in the area or confirming PEC's conclusion that operation of BSEP over the license renewal term would not jeopardize the population of any threatened or endangered species, including candidate species and species proposed for listing, under the jurisdiction of the NMFS. PEC will include a copy of this letter and your response in the Environmental Report that will be submitted to the NRC as part of the BSEP license renewal application.

Please refer any questions regarding this submittal to Mr. Jan Kozyra, Lead Engineer - License Renewal, at (843) 857-1872.

Sincerely,



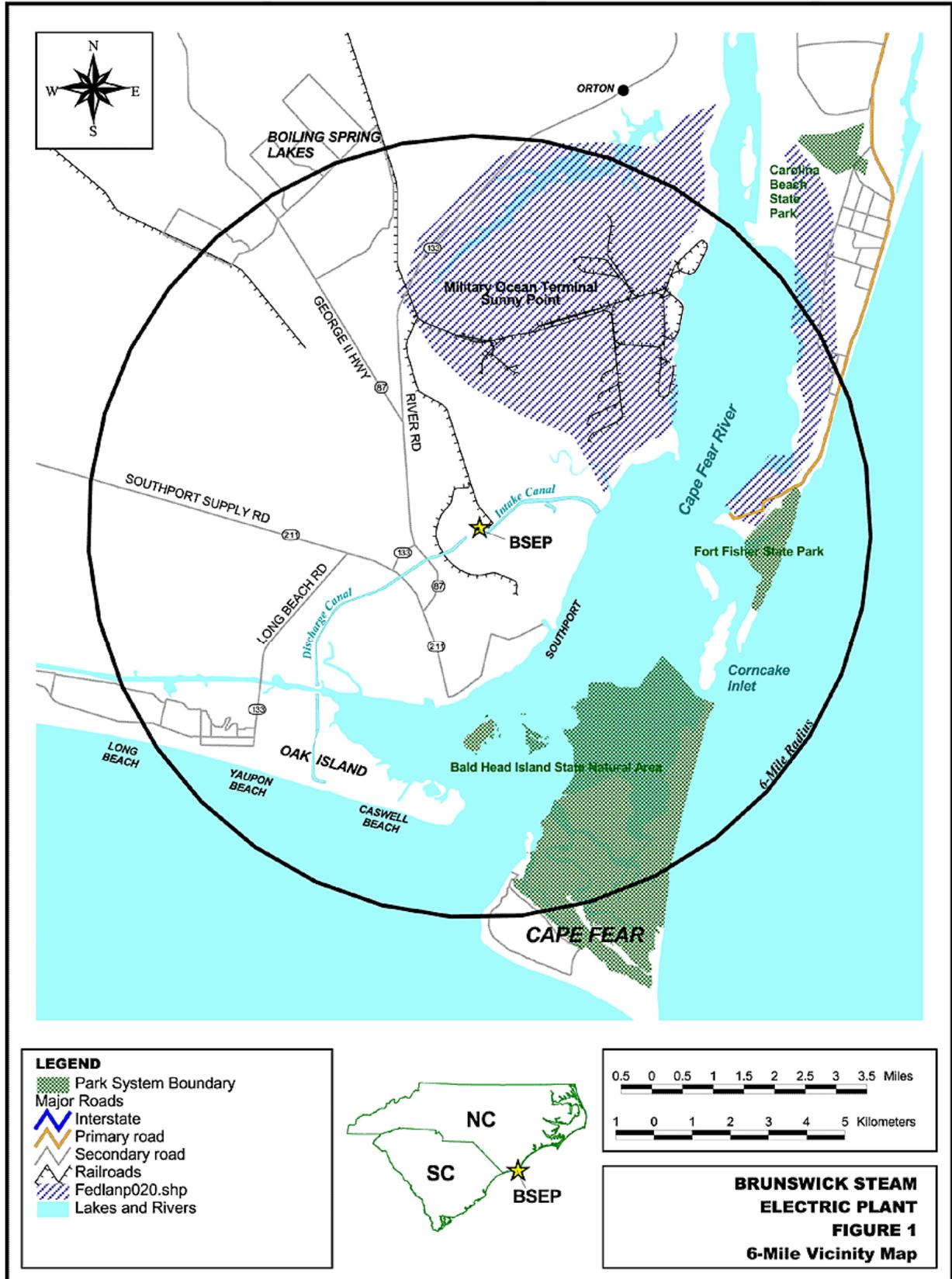
Edward T. O'Neil
Manager - Support Services
Brunswick Steam Electric Plant

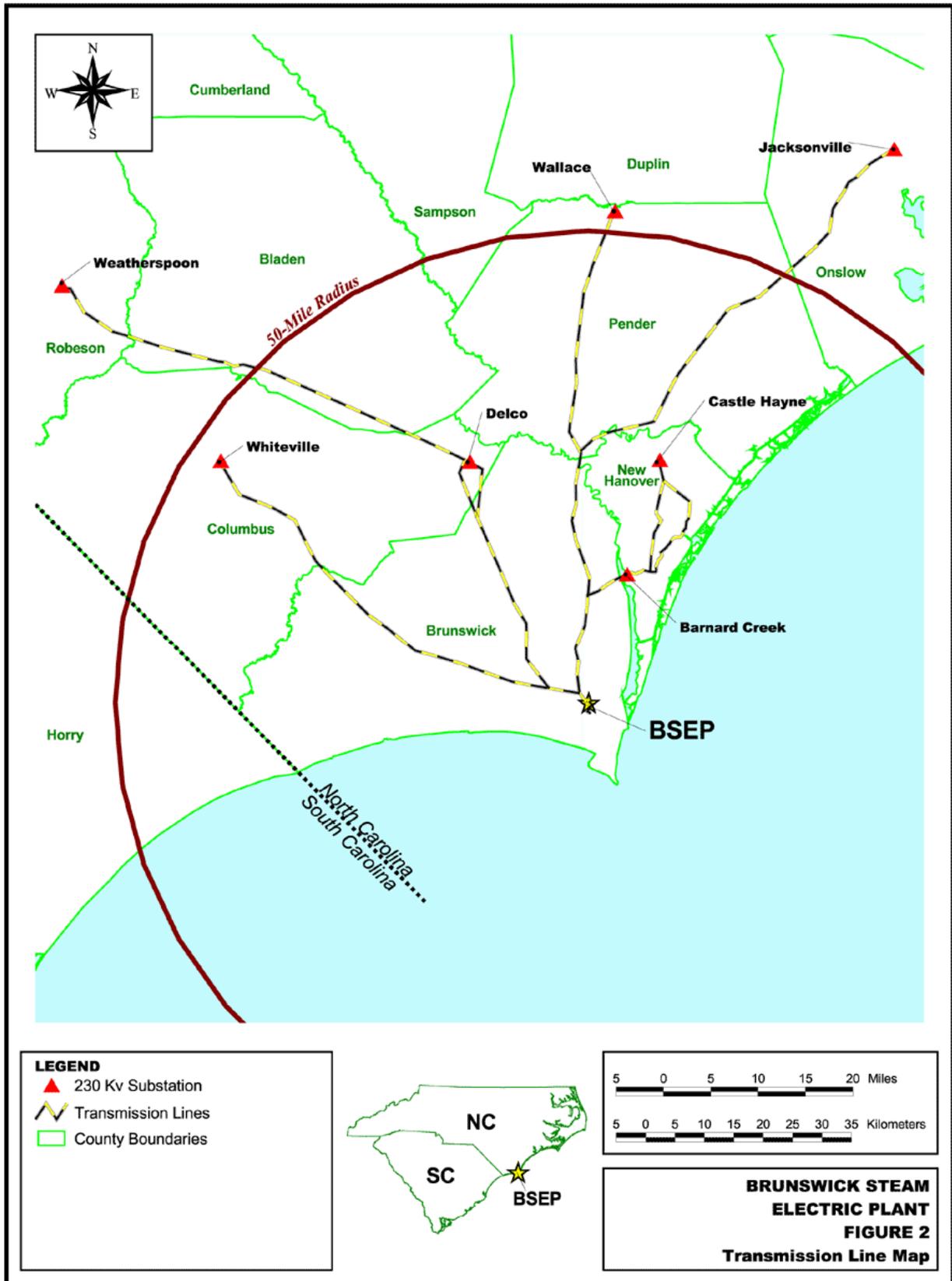
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Enclosures:

Figure 1 - Brunswick Steam Electric Plant 6-Mile Vicinity Map

Figure 2 - Brunswick Steam Electric Plant Transmission Line Map







MAY 12 2003

SERIAL: BSEP 03-0085

Mr. Harry LeGrand
North Carolina Natural Heritage Program
Office of Conservation and Community Affairs
North Carolina Dept. of Environment and Natural Resources
1615 MSC
Raleigh, NC 27699-1615

**BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
LICENSE RENEWAL - REQUEST FOR INFORMATION
LISTED SPECIES AND IMPORTANT HABITATS**

Dear Mr. LeGrand:

Progress Energy Carolinas, Inc. (PEC) is preparing an application to the U.S. Nuclear Regulatory Commission (NRC) to renew the operating licenses for the Brunswick Steam Electric Plant (BSEP), which expire in 2016, for Unit 1 and 2014, for Unit 2. PEC intends to submit this application for license renewal in December 2004. As part of the license renewal process, the NRC requires license applicants to assess the impact of the proposed action on threatened or endangered species in accordance with the Endangered Species Act. The NRC will consult with the U.S. Fish and Wildlife Service under Section 7 of the Endangered Species Act and may also seek your assistance in the identification of important species and habitats in the project area. By contacting you in advance, we hope to identify any issues that need to be addressed or information required to expedite the NRC's consultation.

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Southport, NC 28461

Mr. Harry LeGrand
BSEP 03-0085 / Page 2

Weatherspoon lines veer to the northwest, and divide again with the Whiteville line traveling parallel to and south of the Weatherspoon and Delco lines which share a corridor to the Delco Substation and then the Weatherspoon lines continues to the Weatherspoon Substation (i.e., see Figure 2). The Whiteville line crosses several pocosins and the Green Swamp; which has been designated a National Natural Landmark by the Department of the Interior. It passes approximately two miles west of Lake Waccamaw, and approximately one mile west of Lake Wacamaw State Park. The Weatherspoon and Delco lines both cross the Little Green Swamp.

The Wallace, Jacksonville, Castle Hayne East, and Wilmington Corning lines travel north from the split near BSEP. Approximately 15 miles north of BSEP, the Castle Hayne line moves east and then north to the Castle Hayne Substation. The other lines continue north, and then split after they cross into Pender County, with one line proceeding north to the Wallace Substation and the other line moving northeast to Jacksonville. The Jacksonville line crosses the northwest portion of the Holly Shelter Game Land in the Holly Shelter Swamp. The Wallace line crosses the B. W. Wells Savannah, a 117-acre remnant of wetland savannah, in northwest Pender County. This tract supports 170 native plant species, several of which are rare. PEC has entered into a partnership with the N. C. Coastal Land Trust, the Conservation Trust for North Carolina, and the N. C. Wild Flower Preservation Society to preserve this unique property.

PEC has no plans to significantly alter current operations over the license renewal period. Any maintenance activities necessary to support license renewal would be limited to previously-disturbed areas. No expansion of existing facilities is planned, and no additional land disturbance is anticipated in support of license renewal. As a consequence, PEC believes that operation of the plant, including maintenance of the transmission lines, over the license renewal period (i.e., an additional 20 years) would not adversely affect any threatened or endangered species.

PEC would appreciate a response to this letter, by June 15, 2003, providing any information you may have concerning listed species or ecologically-significant habitats that may occur on the 1,200-acre BSEP site, or along associated transmission corridors. This will enable PEC to meet the current application preparation schedule. PEC will include a copy of this letter and your response in the license renewal application to the NRC.

Mr. Harry LeGrand
BSEP 03-0085 / Page 3

Please refer any questions regarding this submittal to Mr. Jan Kozyra, Lead
Engineer - License Renewal, at (843) 857-1872.

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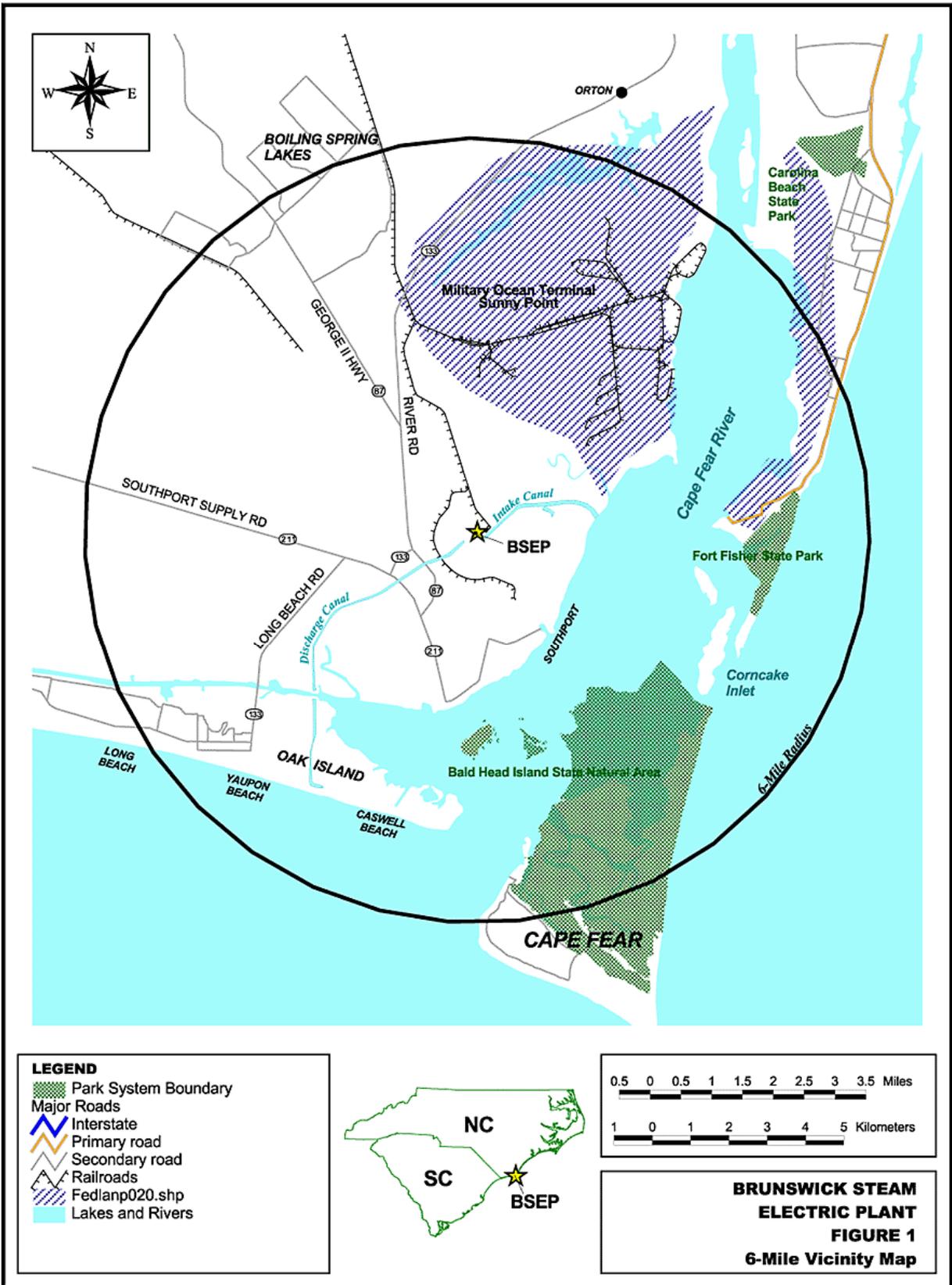


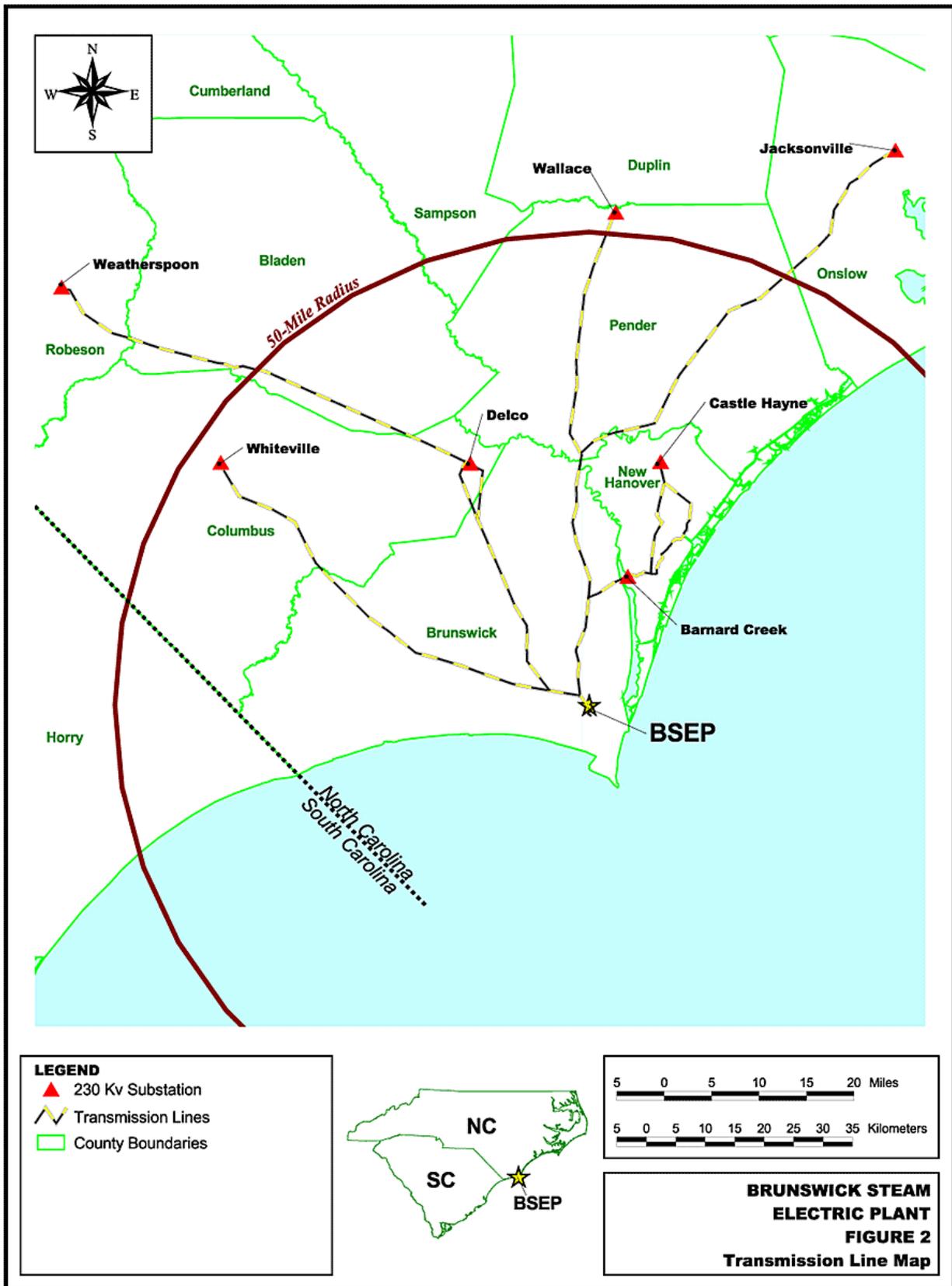
Edward T. O'Neil
Manager - Support Services
Brunswick Steam Electric Plant

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Enclosures:

- Figure 1 - Brunswick Steam Electric Plant 6-Mile Vicinity Map
- Figure 2 - Brunswick Steam Electric Plant Transmission Line Map







North Carolina Department of Environment and Natural Resources
Division of Parks and Recreation

Michael F. Easley, Governor

William G. Ross, Jr., Secretary

Philip K. McKnelly, Director

May 21, 2003

Mr. Edward T. O'Neil
Progress Energy Carolinas, Inc.
P.O. Box 10429
Southport, NC 28461

Subject: License Renewal for the Brunswick Steam Electric Plant; Southport, Brunswick County

Dear Mr. O'Neil:

The Natural Heritage Program has only one record of rare species on the Brunswick Plant site at Southport. The Carolina diamondback terrapin (*Malaclemys terrapin centrata*), a Federal Species of Concern, has been reported from the canal near the plant. This species is typically found along estuarine shores, however.

Although our maps do not show records of other natural heritage elements in the electric plant project area, it does not necessarily mean that they are not present. It may simply mean that the area has not been surveyed. The use of Natural Heritage Program data should not be substituted for actual field surveys, particularly if the project area contains suitable habitat for rare species, significant natural communities, or priority natural areas.

On the other hand, our Program has many dozens of rare species locations, mostly plants, within the powerline corridors in the overall project area, which extends in a 50-mile radius from the electric plant. Getting that material to Progress Energy is beyond the capabilities of our Program. The State's Center for Geographic Information and Analysis is best suited for such a large-area information request, and CGIA <www.cgia.state.nc.us> has the Natural Heritage data layer on rare species locations. They also have a data layer on protected or other Natural Heritage sites.

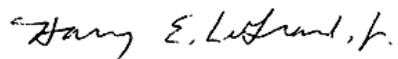
Your letter mentions several natural areas along PEC powerline corridors in the study area. It is also worth mentioning that in summer 2002, a biologist for a consulting firm, perhaps hired by PEC, found several new populations of the Federally Endangered golden sedge (*Carex lutea*) and rough-leaf loosestrife (*Lysimachia asperulifolia*) and numerous new populations of the Federal Species of Concern Venus flytrap (*Dionaea muscipula*) in the powerline on lands owned by The Nature Conservancy, north and east of Holly Shelter Game Land. Some of these lands are being inspected for potential acquisition by the Division of Parks and Recreation for a future state park

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Phone: 919-733-4181 \ Fax: 919-715-3085 \ Internet: www.ncsparks.net
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unit. Thus, it is important the PEC continue its level and type of powerline maintenance, such as mowing/bush-hogging during the non-growing season on a roughly 3-year cycle, and avoid usage of herbicides or other chemicals to kill or retard vegetation in such sensitive biological areas.

You may wish to check the Natural Heritage Program database website at www.ncsparks.net/nhp/search.html for a listing of rare plants and animals and significant natural communities in the county and on the topographic quad map. Please do not hesitate to contact me at 919-715-8687 if you have questions or need further information.

Sincerely,



Harry E. LeGrand, Jr., Zoologist
Natural Heritage Program

HEL/hel