

Chatham County

Environmental Review Advisory Committee Comments on Environmental Impact Assessment

Goldston Sports Cricket Fields

Environmental Impact Assessment Item	Comments
Proposed Project Description and Need	
1. Describe the overall project in detail, including all proposed phases.	<p>Disparity of acreage between the EIA (37.3 acres) and the Rezoning Application (33.78 acres) for this project.</p> <p>The Cricket Fields parcel is part of a larger 800+ tract. Is more development planned on additional acreage?</p>
2. Provide a project location map showing surrounding areas.	
3. Provide a project site plan showing existing and proposed facilities.	<p>EIA Page 27 and Page 33 show differing parking lot layouts around the clubhouse restaurant. Page 33 shows parking lot layout that has fewer parking spaces & only one exit from parking lot.</p> <p>Also, see item 9. below noting disparity of number of proposed parking spaces stated: 271 in EIA and 244 in Rezoning.</p>

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<p>4. Describe how this project fits into larger plans or connects with adjacent projects.</p>	<p>Statement in EIA, p. 2: <i>This project is stand-alone and not associated with or connected to larger or adjacent projects.</i></p> <p>Proposed EIA Site Plan shows a traffic circle south of field 4. The centerline of the main access road seems to follow the existing dirt road and then continue south [offsite] from the traffic circle. Will the traffic circle have a stub-out for future road connectivity to development of PIN 9268 that is not part of the proposed athletic field complex?</p> <p>Applicant needs additional explanation of how this project fits into a community that is primarily rural housing, farms and land that is under NC tree management and leased for hunting.</p>
<p>5. List and describe public facilities or benefits provided by the project.</p>	<p>Rezoning Application, Comp. Plan, p. 7: <i>A high percentage of the county population will have access to the <u>public</u> recreation area to participate in the associated activities</i></p> <p>Would this be a private club or public sports facility with associated restaurant? What are the limitations and what body would allow the public to share access?</p> <p>The applicant has not provided data or information showing that cricket fields are seen as benefits to the surrounding community or residents of Chatham County in general.</p> <p>If tournaments are planned, will there be detrimental impacts concerning traffic, parking, noise, light pollution and the size of the septic system?</p> <p>Would this be a private club or public sports facility with associated restaurant? What are the limitations and what body would allow the public to share access?</p>

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<p>6. Discuss the land acreage to be disturbed during each phase.</p>	
<p>7. List square footage and height (in stories) of new buildings.</p>	
<p>8. Describe proposed uses of all buildings and proposed facilities.</p>	<p>Where will sport and maintenance equipment and supplies be stored? Will additional structures be needed for team use dugouts?</p> <p>Will alcohol use be allowed on site or at the restaurant?</p>
<p>9. Show number of parking spaces in parking lots and decks.</p>	<p>Disparity between the number of proposed parking spaces: 271 stated in EIA and 244 in Rezoning Application.</p> <p>There is one small, paved parking lot, located between fields 1 & 2, with a driveway off Roberts Chapel Church Road. Why is this parking lot not connected to the main roadway of the athletic complex instead?</p> <p>There are proposed parking sites outlined but can't tell the numbers per site. Are they going to add more sites? Why is it only "proposed". If hosting tournaments: how will they handle additional parking for more visitors?</p>
<p>10. Show areas to be cleared, graded, filled, paved and landscaped.</p>	<p>There is a scalloped line roughly drawn to show the proposed tree line on Site Plan. Why is there a tree line starting from field 3 and crossing fields 3, 4 & 6? This appears to be an error on the EIA Site Plan (This is not on the Site Plan in Re-zoning Application.)</p>

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<p>11. Show connections to existing utility and sewer lines or new utilities.</p>	<p>Provide layout of proposed irrigation system for fields and landscaping areas. There is no mention of watering these areas in EIA or Rezoning Application.</p> <p>The upkeep of six grass cricket fields, one practice pitch, and landscaping areas will require frequent watering over the summer. How much water is required daily to maintain a one cricket pitch Quick online search: As much as 5,283 gpd watering/pitch. That would be more than the total estimated flow of 2,700 gallons noted for water flow in the EIA.</p> <p>Could groundwater drawdown affect local water well levels for the adjacent homes and farms during a drought?</p> <p>Will the onsite septic system be adequate to meet the needs of spectators and participants during tournaments?</p> <p>Proposed telecommunication and electric connections not on the site plan.</p>
<p>12. Show wastewater management systems on a map.</p>	<p>In the Proposed Site Plan, part of the conventional septic area extends offsite [south of the clubhouse]. Will this entire area be utilized or was this to show the septic suitability in parcel 9268 that is not part of the proposed Goldston Sports Cricket Fields?</p> <p>The septic field is very close to the stream buffer.</p> <p>Have perk tests been performed?</p>

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<p>13. Show proposed areas of impervious and semi-pervious surfaces.</p>	<p>Gravel parking lots and roadways are considered impervious surfaces by Chatham County and should be included in calculations for runoff from impervious surface areas.</p> <p>Has the applicant explored the use of permeable pavement for the parking lot, sidewalks, and other paved areas? Other Green Infrastructure applications could also be discussed in the EIA (i.e. rain water collection, green roof, etc.)</p>
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<p>14. Show and describe any proposed stormwater control devices.</p>	<p>Stormwater control devices are not proposed in the EIA but are mentioned in the Rezoning Application.</p> <p>ERAC members raised concerns about any pesticides and other lawn management chemicals that are used on cricket fields, particularly, those nearest the wetlands, ponds, streams.</p> <p>Due to the fertilizer demand for turf grass of playing fields, has the applicant considered SCMs for nutrient runoff interception especially with the proximity of wetlands and a waterway?</p> <p>Location of broad swales and flow directions are not indicated on site map.</p> <p>Pre vs Post Development calculations are not included in the report.</p> <p>Grassed playing field interception and absorption of stormwater is drastically different from wooded and meadow lands and should be calculated in stormwater runoff and management strategies.</p> <p>Temporary sediment basins used during construction can be converted to treatment wetlands for nutrient removal and volume control during post construction.</p> <p>How will runoff from parking lots/building be handled?</p>
<p>Alternatives Analysis</p>	
<p>1. Discuss and compare all reasonable development alternatives (site selection, facility layout, utilities, stormwater management, construction methods, open space preservation, any other pertinent alternative considerations.</p>	<p>This Cricket Fields parcel is part of a larger 800+ tract. Why put the fields so close to the adjacent resident neighbor? The cricket field closest to road borders a wetland that is shared by adjacent landowner.</p>

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<p>2. Discuss how the preferred alternative was selected and its benefits relative to other alternatives (including a no-build alternative, if applicable).</p>	
<p>Existing Environment and Project Impacts For each resource topic below, describe:</p>	
<p>A. Existing resources and conditions.</p>	
<p>B. Anticipated impacts (short-term construction impacts, long-term operation impacts, and indirect or secondary impacts.)</p>	<p>There is not an adequate discussion of long-term impacts, nor of the secondary and indirect impacts of traffic, stormwater, well water</p> <p>What sediments and erosion control devices are to be used during development? Would there be a long-term BMP for stormwater? How does the applicant plan to limit additional sediment to the local creeks/pond/wetlands?</p>
<p>C. Discuss how potential impacts to the resource will be avoided and minimized through alternative selection, design strategies, construction methods, and long-term maintenance procedures.</p>	<p>The EIA should provide more evidence that other layouts would have greater impacts to the environment and jurisdictional waters. Is there a study showing the community need for cricket fields or increased access to athletics and leisure? How is “community” defined in terms of scope?</p> <p><i>“The site will be stabilized with permanent vegetation upon completion of grading activities.”</i> What type of permanent vegetation? Are they speaking of the turf grass on the fields?</p> <p>Will there be use of native grasses and sedges for slopes and area adjacent to buffers?</p> <p>Open the site to plant rescue prior to land disturbance activities to allow for proper collection.</p>
<p>D. For unavoidable impacts, describe whether any compensatory mitigation is planned or required.</p>	<p>Will there be compensation to adjacent landowners for unavoidable negative impacts to their properties?</p>
<p>1. Geography</p>	

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<ul style="list-style-type: none"> Discuss the geographic setting, geology, and topography of the project area and adjacent areas. 	<p>Indian Creek drains to Deep River (which drains to the Cape Fear River)</p>
<ul style="list-style-type: none"> Provide a topographic map of the property and surrounding area, use the county GIS website topography (2' contours interval) data at a scale appropriate for the project size, i.e., 1" = 100', etc.). 	
<ul style="list-style-type: none"> Identify any 100-year floodplains (FEMA Special Flood Hazard Areas) on or adjacent to the property. If present, provide an appropriate-scale map of the flood-prone areas defined by the NC Flood Mapping Program. 	
<ul style="list-style-type: none"> Show areas that will be graded or filled, and provide estimated cut/fill volumes. 	<p>Graded or filled areas are not mapped.</p>
<ul style="list-style-type: none"> If the project includes pond or dam work, show areas that will be flooded. 	<p>On p. 6. of EIA it states <i>Non-jurisdictional pond will be expanded.</i> The pond location is shown on Proposed Site Plan but there is no note about expansion or amount of area that will be flooded. Will it be expanded to use as a stormwater pond? (See additional info to comment 37 below.)</p>
<p>2. Soils and Prime Farmlands</p>	
<ul style="list-style-type: none"> Identify dominant soils in the project area (county GIS or NRCS website) and show on a map. 	
<ul style="list-style-type: none"> Discuss any soil constraints (fill, wetland soils, septic suitability, slopes, etc.) and indicate those areas on a map. 	
<ul style="list-style-type: none"> Describe any soil disturbance or contamination expected as a result of this project. 	<p>Will the cricket fields require use of herbicides or pesticides?</p>
<ul style="list-style-type: none"> If contamination is expected, discuss containment plans and procedures. 	

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<ul style="list-style-type: none"> If soil will be relocated, specify the number of square yards/feet to be moved, and its relocation site. 	<p>Relocation sites?</p>
<ul style="list-style-type: none"> Describe runoff management plans for the project. 	<p>The EIA does not describe runoff management plans for the project.</p> <p>In the Re-zoning Application: 5.E. Stormwater Runoff: The proposed stormwater management system will consist of a wet detention pond and possibly additional sand filters below each outfall point to collect and treat all new impervious surfaces. Detailed design plans will be submitted pending zoning approval for review by the Chatham County Stormwater Department. Post developed flows will be reduced to or below pre-developed storm rates to prevent downstream flooding and erosion.</p> <p>The Site Plan ERAC received differs from the one submitted in the Rezoning Application.</p> <p>Note on the Site Plan for Rezoning: NON-JURISDICTIONAL POND TO BE UP FITTED INTO A SCM—PENDING ARMY COPS [sic] REVIEW OF JURISDICTIONAL FEATURES <i>[SCM = Stormwater Control Measure]</i></p> <p>Areas have been reserved for potential sediment basins as required. Will sediment basins become stormwater ponds?</p>
<ul style="list-style-type: none"> If soil disturbance is proposed, describe the off-site impacts expected from this activity. 	
<ul style="list-style-type: none"> Provide a map of any prime or unique farmland soils in the project or service areas, and include reference used to make this determination. 	

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<ul style="list-style-type: none"> Describe impacts to prime or unique farmland soils, including acreage estimates of lost farmland soils and retained farmland soils. 	<p>The Farmland Classification map of prime or unique farmland soils in the EIA for this project shows over half of the acreage is in soils classified as NaC, NaD, CkC and BDB - all of which are listed as Farmlands of State Importance. This is in addition to the small area of NaB prime farmland soils cited in the EIA.</p>
<p>3. Land Use</p>	
<ul style="list-style-type: none"> Provide a map showing current use of land on the site and surrounding properties. 	
<ul style="list-style-type: none"> Discuss how the current land use fits into the surrounding area (conservation, development, ecological function, etc.). 	<p>The EIA states that <i>“The project will be used by neighbors.”</i> No information has been provided to substantiate that the neighbors will?</p> <p>The EIA states that the <i>Facility will not produce excess noise, air or light pollution that could impact the adjacent residences. Similar forest resources as those lost to the athletic fields will remain on adjoining properties, promoting continued ecological function in the area.</i> How is “excessive” defined? Removing forest resources to the athletic fields is an overall loss.</p>
<ul style="list-style-type: none"> Provide the current zoning of the project site and the surrounding area. 	<p>INCORRECT: This site and surrounding area is zoned as R-1.</p>

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<ul style="list-style-type: none"> Discuss how the proposed uses fit into the intended land use of the area (conservation, development, ecological function, quality of life). 	<p>EIA needs to define what they mean by the "spirit" of the surrounding land uses and how this proposed use fits that, considering this is a rural agricultural community.</p> <p>The EIA does not discuss that the project area on Roberts Chapel Church Road, Goldston is shown as "Agricultural Land" on the Chatham County <i>Future Land Use and Conservation Plan</i>.</p> <p>Will athletic fields be compatible with hunting that takes place on adjacent lands?</p>
<ul style="list-style-type: none"> Indicate whether zoning or local land use plans will need to be changed after project completion. 	<p>The EIA does not include the fact that a Rezoning Application has been submitted to change the zoning from R-1 Residential to CD-RB Conditional District Regional Business.</p> <p>Were all adjacent landowners properly notified?</p>
<p>4. Wetlands</p>	
<ul style="list-style-type: none"> Indicate whether wetlands are present, describe the basis for this determination and identity of the person who made the determination. 	
<ul style="list-style-type: none"> Show identified wetlands on a map, and describe all relevant details, such as acreage, types, delineation, function, etc.) 	<p>A 50-foot barrier between the wetlands is shown on the proposed site plan. The landscape screening buffer goes right through the pond and the wetlands buffers. Is this an error?</p> <p>How is the wetland area next to the field not going to be impacted?</p> <p>EIA needs discussion of SCMs to handle stormwater runoff from level short grass fields—especially, those close to jurisdictional wetlands and pond. Also, are drainage areas needed around cricket fields. [Dimensions of these fields seem smaller than the standard field sizes?]</p>
<ul style="list-style-type: none"> If wetlands are to be filled, specify the number of acres that will be affected. 	

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<ul style="list-style-type: none"> List all required permits and permitting agencies. 	
<ul style="list-style-type: none"> If any diversions/additions/withdrawals of surface water will affect wetlands, describe those activities. 	
5. Public lands and Scenic, Recreational, and State Natural Areas	
<ul style="list-style-type: none"> Provide a map of County or municipal parks, scenic, recreational or state natural areas (SNHAs, State or Federal Forests, etc.) on or adjacent to the site/project area. 	
6. Areas of Archaeological or Historical Value	
<ul style="list-style-type: none"> Discuss any archaeological or historical studies of the project location; provide relevant references. 	Incomplete. Has the developer received the state response at this time?
<ul style="list-style-type: none"> Describe and identify on a map any structures (i.e., walls, buildings, etc.) on the site and provide estimated ages of those structures. 	
<ul style="list-style-type: none"> Describe all impacts to any archaeological or historical resources in the proposed project area. 	Will there be road and access to historic family cemetery located on the larger 800+ acres? This cemetery predates the county's establishment.
<ul style="list-style-type: none"> Describe plans for demolishing or rebuilding any structures. 	
<ul style="list-style-type: none"> Provide photographs of any significant resources, including all structures older than 50-years. 	
<ul style="list-style-type: none"> Provide relevant correspondence with the Chatham County Historical Association and NC SHPO. 	The letter developer provided to NC SHPO is not included with this EIA.
7. Air Quality	

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<ul style="list-style-type: none"> Describe the project’s impacts on ambient air quality. 	
<ul style="list-style-type: none"> Describe plans for any open burning during or after construction. 	No answer given. Adjacent landowners have stated that burning is currently taking place on the larger 800+ acres.
<ul style="list-style-type: none"> Indicate the number of proposed parking spaces, if applicable. 	
<ul style="list-style-type: none"> Describe whether the project will increase odor levels, or the likelihood of odor complaints. 	
<ul style="list-style-type: none"> Provide a copy of any required traffic studies. 	<p>Required or not, it would be important to know the expected changes and impact to a rural road during high volume event days on weekends.</p> <p>Will there be an increase of traffic volume during cricket tournament events? Will these be held over the weekend?</p>
8. Noise Levels	
<ul style="list-style-type: none"> Discuss current noise levels; use a benchmark if possible. 	
<ul style="list-style-type: none"> Describe any increases in noise levels expected from this project. 	What does “small increase in noise during events” mean? Will there be amplified sound?
<ul style="list-style-type: none"> Specify the distance at which the increased noise will be heard. 	
<ul style="list-style-type: none"> Discuss whether surrounding properties will be affected by noise levels. 	
<ul style="list-style-type: none"> If commercial uses are proposed, specify the hours of operation. 	Will there be a limit to the times when events are played, to reduce impact on neighbors? Will traffic and games be occurring before noon on Sundays, or after dark?
9. Light Levels	

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<ul style="list-style-type: none"> Describe lighting plans for the project, including how lighting will impact adjacent residents and wildlife. 	<p>The EIA states that <i>“Five exterior lights to located in the vicinity of the clubhouse restaurant and practice pitch. The lights will be in use during limited hours on weekends.”</i></p> <p>If the complex is open year-round, will stadium lights be needed to light playing fields in the winter?</p> <p>Are the lights typical streetlights or some type of stadium lighting that would provide enough light for games to occur at night? How bright?</p> <p>Use of dark sky certified lighting where possible will help limit impact to wildlife.</p>
<p>10. Surface and Groundwater Resources (discuss separately)</p>	
<ul style="list-style-type: none"> Identify and provide a map of surface waters in the project area. Describe groundwater (aquifers) in the project area. 	<p>Indian Creek drains to the Deep River</p>
<ul style="list-style-type: none"> Include names, locations, classifications, and use support ratings for surface waters. 	
<ul style="list-style-type: none"> Specify and show on a map the river basin in which the project is located. 	
<ul style="list-style-type: none"> Discuss any known groundwater quality issues. 	
<ul style="list-style-type: none"> Discuss drinking water sources. 	<p>Will there be irrigation for the fields and landscaping? From the well?</p>
<p>11. Fish and Aquatic Habitats</p>	
<ul style="list-style-type: none"> Describe fish and aquatic habitats in and adjacent to the site/project area. 	
<ul style="list-style-type: none"> Discuss impacts to fish and aquatic life and their habitats, including a map showing those habitats. 	
<p>12. Wildlife and Natural Vegetation</p>	

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<ul style="list-style-type: none">Describe and provide a map of natural community types on and adjacent to the site/project area.	Drawing 2 is simply a Google Earth map, and does not show natural community types.
<ul style="list-style-type: none">List the species of dominant plants and animals observed on the site that typify those communities.	No list is included of animal observations on the site.
<ul style="list-style-type: none">Evaluate and discuss whether suitable habitat exists for rare, threatened, and /or endangered species, as described by the NC Natural Heritage Program.	How was the assessment conducted to determine if habitat and endangered species are present, especially for nocturnal and aquatic species?
<ul style="list-style-type: none">If wildlife will be displaced, discuss any limitation of adjacent areas to support them.	<p>The EIA states: <i>“Adjoining properties to the south and east contain forested land similar to that on the site and sufficient to support wildlife that could be displaced from the site. Additional nearby forested land suitable for supporting displaced wildlife is abundant in the area.”</i></p> <p>This is a misleading statement. Nearby forested land of similar habitat is presumably already occupied by wildlife. Displacement caused by habits loss ultimately results in wildlife loss (death) through competition for remaining resources.</p> <p>Discuss design of landscaping to be wildlife corridor/connectivity friendly as well as inclusion of native plant material in the landscaping plan.</p>
<ul style="list-style-type: none">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.	Any plan for removal of invasive species on site to help curb the usual spread that occurs during land disturbing activities?

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<ul style="list-style-type: none"> If forest will be cleared, discuss the extent of planned deforestation and specify the forestry methods to be used, including BMPs. 	
<p>13. Hazardous Materials</p>	
<ul style="list-style-type: none"> List all hazardous materials to be stored or introduced during construction or operation. 	<p>Will fuels, pesticides or herbicides be stored onsite? Equipment fuel storage?</p> <p>How will oil and grease from the proposed restaurant be managed and disposed of?</p> <p>How will the fields be maintained for fertility? Does the facility plan to use herbicides to kill unwanted vegetation?</p> <p>What does the facility plan to do for control of increased levels of mosquitoes, flies, and other bugs due to the proximity of wetlands and agriculture operations nearby, such as poultry houses and a large compost facility to the south of the property line? Unlike recreational projects closer to urban areas, nearby agricultural operations may attract seasonal pests and, therefore, increase the local population. How does the property owner plan to relieve players and spectators of these nuisances?</p>
<ul style="list-style-type: none"> For each hazardous material, other than deminimis quantities or for routine housekeeping purposes, describe the procedures to be used to ensure their proper management, storage, and disposal. 	<p>Describe management, storage and disposal plans for the materials described in the above comments.</p>
<p>References</p>	

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Exhibits (Maps, Figures, Tables, Photos, etc.)	<p>On the EIA site plan, sugar maples and Lacebark elm are indicated for the street trees along Roberts Chapel Church Rd. (Rezoning Application shows White oak is substituted for Lacebark elm).</p> <p>Sugar maples general don't thrive as a parking lot/ street tree due to the air pollution and the radiant heat reflected from paved surfaces on their delicate leaves.</p> <p>We note that error of tree line crossing the cricket field in EIA site plan was corrected in Rezoning Application site plan.</p>
State and Federal Permits Required	We defer to county staff as to whether this is a complete list.