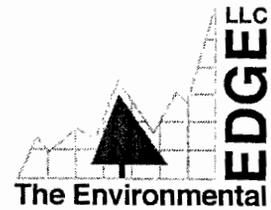


451-1615 DFW



"Bringing business and the environment together"

July 25, 2005

David H. Gordon, Ph.D.
Acting Field Supervisor
U.S. Fish & Wildlife Service
176 Croghan Spur Road, Suite 200
Charleston, SC 29407

RE: FWS Log No: 4-6-05-T-438

Dear Dr. Gordon:

Mr. Butch Kirven, Chairman of the Greenville County Economic Development Corporation (GCEDC), informed you by letter that we would conduct a field survey for endangered plants thought to occur within the corridor of the Greenville & Northern Railroad between Greenville and Travelers Rest, SC.

Field Review

On July 20, 2005, a team composed of Dr. Gill Newberry, Dr. Joe Pollard and Carlton Owen conducted a field review of habitats that could harbor the species in question.

Dwarf-flowered Heartleaf -- *Hexastylis naniflora*

We found no populations of dwarf-flowered heartleaf, nor, given the habitats that occur along the corridor, do we expect it to be present.

Bunched Arrowhead -- *Sagittaria fasciculata*

We did find a healthy population of bunched arrowhead on the west side of the GNRR corridor at two closely related locations just south of Watkins Bridge Road. This habitat is maintained in a semi-open, disturbed condition associated with a sewer right-of-way. We found no other occurrences of bunched arrowhead in any of the potential habitats either north or south of Watkins Bridge Road.

- The first population is approximately 850 feet south of Watkins Bridge Road on the western side of the corridor. Given that the right-of-way is 100 feet at this point (50 feet on either side of the rail center line), the population is perhaps only slightly within the fringe of the right-of-way, if at all. Most of the population is likely on the adjacent private land and subject to a sewer right-of-way.

David H. Gordon, Ph.D.
July 25, 2005
Page 2

- The second population is approximately 1000 feet south of Watkins Bridge Road and also on the western side of the corridor. Some of these plants are within the rail right-of-way, with still others likely on the adjacent private land and again subject to the sewer right-of-way.

The other known population occurs on the Furman University campus just east of the GNRR corridor. That population is separated from the rail corridor by a chain link fence.

Findings and Recommendations

We believe that the plans as outlined by the GCEDC in their letter offer the best opportunity to protect and sustain the existing populations of bunched arrowhead that occur near the right-of-way of the GNRR. While the plants are within what we believe is the right-of-way owned by the GNRR they are not immediately adjacent to the rail bed and will not be impacted by any proposed trail activity. We see nothing in the clearing, maintenance and long-term plans (that could include paving of the trail) that should negatively affect the populations with perhaps the exception of herbicide use. However, if proper herbicides are used according to label directions and just to retard vegetation on the rail bed, risks should be minimized. That said, we would recommend that a no-spray zone be marked and maintained for at least 50 feet north and south of the populations as well as along a feeder creek that runs under the rail bed just north of the Watkins Bridge Road population. A similar no-spray zone near the Furman population, while not as critical, would provide an added layer of safety for the plants.

Given the alternative uses of the GNRR other than a recreational trail, we are unequivocal in our belief that the trail is a very compatible use and perhaps the best alternative to further the existence of the identified population. Therefore, we are strongly supportive of GCEDC's plans for abandonment and interim trail use of the GNRR.

Respectfully,



Gillian Newberry, Ph.D.
Professor of Biology
Division of Natural Sciences & Engineering
University of South Carolina Upstate

A. Joseph Pollard, Ph.D.
Professor & Chair
Department of Biology
Furman University

Cc: Mr. Butch Kirven, GCEDC
Mr. William Mullen, Attorney
Mr. Vernon Williams, Surface Transportation Board