

Exhibit P, Holly Ridge Northeast Site,
Wetlands and Other Waters Findings Report



**WETLANDS AND OTHER WATERS
FINDINGS REPORT**

**HOLLY RIDGE NORTHEAST
HIGHWAY 183 AND I-20
RICHLAND PARISH, LOUISIANA**

Prepared for

Mr. Randy Denmon
Denmon Engineering
114 Venable Lane
Monroe, LA 71203

Prepared by
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655 MEADOWBROOK ROAD
JACKSON, MS 39206

May 2013

INTRODUCTION

A wetlands investigation was conducted for an approximately 259 acre tract of land (herein called the "Site") located on the east side of Highway 183 between Highway 80 and Interstate 20 in Richland Parish, Louisiana (Exhibits 1 and 2). The purpose of the investigation was to identify and *delineate* any wetlands and *Other Waters of the U.S.* The investigator was Mr. Bill McAbee with McAbee Wetland Services, and the Site was investigated on March 28, 2013. Methodology of the investigation followed guidelines set forth in the 1987 COE Wetland Delineation Manual and the Regional Supplement Manual for the Atlantic and Gulf Coastal Plain Region (Version 2.0).

BACKGROUND

Site Conditions

The Site was actively farmed and was improved with a well and a rotating irrigation system (Exhibit 3). At the time of the site visit the fields had been rowed and planted in corn with some mature winter wheat along the western quarter of the Site (Exhibits 4 and 5). The property has been actively farmed since at least 1987 according to USDA Soil Conservation Service records.

There were no flume ditches or other storm water conveyances noted on the Site, however there were drainage ditches located adjacent to south and northwest of the Site that aided in effectively draining the Site. Big Creek was located a few hundred yards to the east. According to the farmer, substantially leveling and drainage improvements have been completed, and there was not any evidence of ponding from storm events or backwater flooding.

There was not any vegetation other than the winter wheat. Based on adjacent lands the dominant habitat would have historically been bottomland hardwoods. Soil pits completed in possible wetland areas revealed non hydric soils, predominantly yellowish brown loamy soils with little or no mottling. Positive hydrological indicators such as oxidized root channels or saturated soils were not present.

Reference Information

The USDA Soil Conservation Service office for Richland Parish was contacted to acquire any information regarding prior converted or farmed wetland determination conducted for the Site. In February 1988, a SCS-CPA-026 form was completed for this property and determined that all of the croplands were Prior Converted (PC) farmlands and all of the forested lands were determined wetlands (Appendix A). The report stated this designation was made from the office and based on the Soil Survey showing at least some hydric soils at the Site.

The Richland Parish Soil Survey indicates that the soils on the site are predominantly Gigger and Gilbert Silt Loam and Dexter silt loam (Appendix B). Gigger (gg) and Dexter (De) are considered well drained, Gilbert (gk and gm) are considered poorly drained.

Color infrared photography (CIR) dating from 1998 and 2004 (Appendix C) and seven years of aerial photography dating between 1998 and 2012 were collected and reviewed (Appendix D). These resources were used to help identify recurring hydrological signatures and helped the investigator determine where in the crop field to complete soil pits.

The USFWS provides a resource for identifying known wetlands; this service is called the National Wetland Inventory (NWI). Data from NWI database was collected and reviewed for the Site (Appendix E). These maps do not contribute to the wetland determination of cropland but do offer opinions on adjacent vegetated habitats.

Floodplain maps from the Federal Emergency Management Agency (FEMA) for the 100-year flood area were collected and reviewed (Appendix F). These maps were revised in 2009 and will become effective in September 2013. While floodplain maps do not include any consideration as to wetland status when being developed, they do often resemble wetland boundaries in areas where surface flooding is the primary hydrological force. They are most useful as a cross reference on larger projects, rather than a delineation tool, to see if any notable difference appears between predicted wetland boundaries and the 100-year floodplain boundaries.

Lidar data developed in 2008 was gathered for the site and evaluated in 2-foot contour lines as well as in 1-foot color imaging (Appendix G). This data is valuable for delineating wetland boundaries that can be based on elevations as verified through on-site investigations.

FINDINGS

It should be noted that boundary of the Site which was investigated in this report, was based on preliminary wetland determinations made for a larger tract, then reduced to avoid and/or minimize any wetland or *Other Water* impacts. Since this was an active farm tract, most of the soil pit locations completed in the field were determined by referencing the CIR and historical aerial photography to identify possible reoccurring wet signatures. While there appear to be a few marginal hydrological indicators on the 2004 CIR photography, this was not confirmed through the field investigations. There were no "wet looking" areas noted and sampled during the site visit.

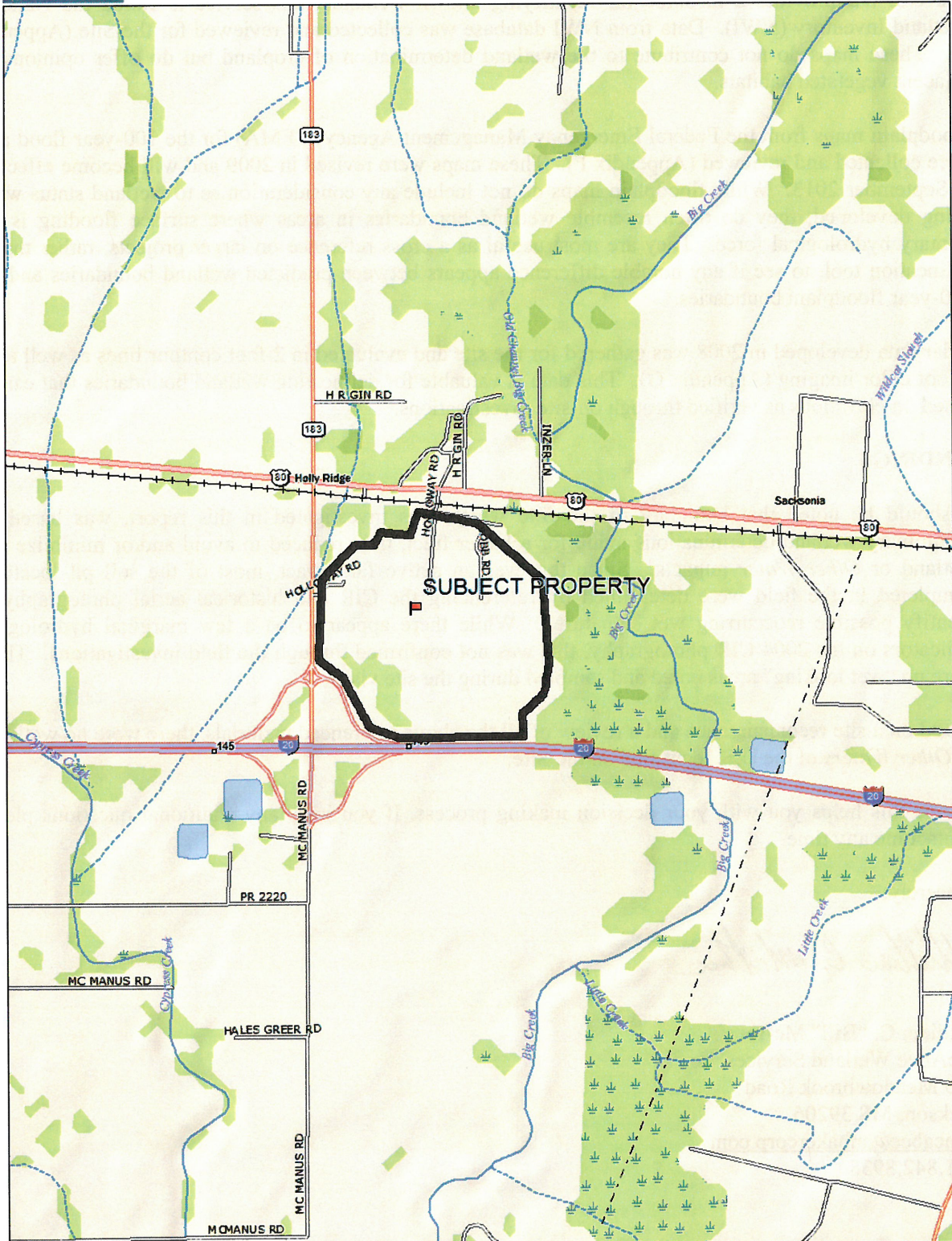
Based on a site reconnaissance and a review of all the above referenced materials, there were no wetlands or *Other Waters* of the U.S. identified on the Site.

I hope this helps you with your decision making process. If you have any additional questions please contact me any time.

Sincerely,



William C. "Bill" McAbee
McAbee Wetland Services
655 Meadowbrook Road
Jackson, MS 39206
wmcabee@mbakercorp.com
601.842.8938



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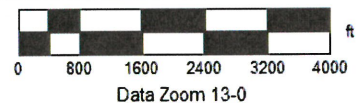


EXHIBIT 1. GENERAL LOCATION MAP

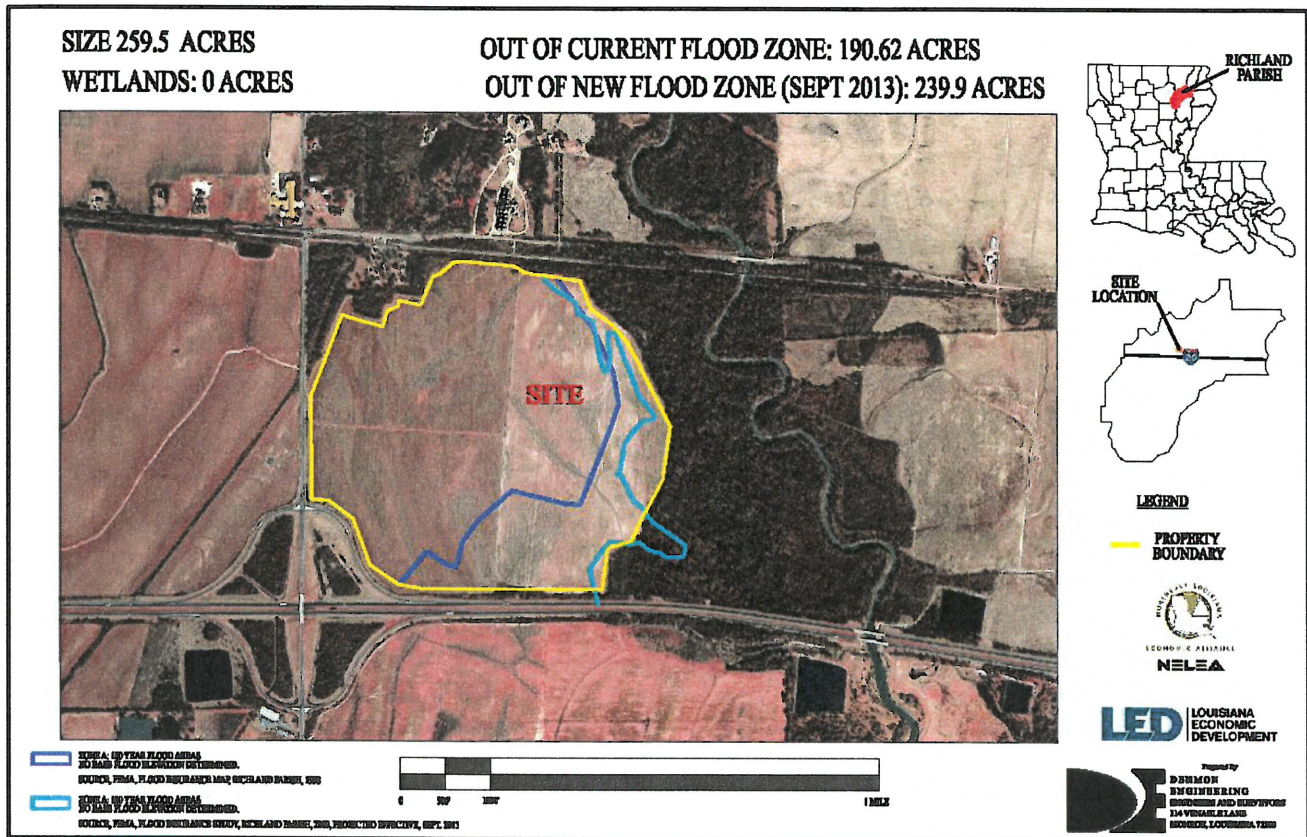


EXHIBIT 2. SITE LOCATION MAP



EXHIBIT 3. SUBJECT PROPERTY, IRRIGATION SYSTEM



EXHIBIT 4. SUBJECT PROPERTY, WHEAT PLANTED ON WEST SIDE OF SITE



EXHIBIT 5. SUBJECT PROPERTY, PLOWED AND PLANTED FIELDS

APPENDIX A

FARM SERVICE AGENCY
SCS-CPA-028 FORM



HIGHLY ERODIBLE LAND AND WETLAND
CONSERVATION DETERMINATIONA. B. Love
Rt 1. Box 228
Rayville, LA 71269Date of request
2-28-88
3. County
Richland

4. Name of USDA Agency or Person Requesting Determination

Fm H A

5. Farm No. and Tract No.

2279 T-0754
F-2772

SECTION I - HIGHLY ERODIBLE LAND

6. Is soil survey now available for making a highly erodible land determination?	Yes	No	Field No.(s)	Total Acres
7. Are there highly erodible soil map units on this farm?	X			
8. List highly erodible fields that, according to ASCS records, were used to produce an agricultural commodity in any crop year during 1981-1985.		X		
9. List highly erodible fields that have been or will be converted for the production of agricultural commodities and according to ASCS records, were not used for this purpose in any crop year during 1981-1985; and were not enrolled in a USDA set-aside or Diversion Program.			3	12
10. This Highly Erodible Land determination was completed in the office <input checked="" type="checkbox"/> Field <input checked="" type="checkbox"/>				

NOTE: If you have highly erodible cropland fields, you may need to have a conservation plan developed for these fields. For further information, contact the local office of the Soil Conservation Service.

SECTION II - WETLAND

11. Are there hydric soils on this farm?	Yes	No	Field No.(s)	Total Wetland Acres
12. List field numbers and acres, where appropriate, for the following EXEMPTED WETLANDS: wetlands with woody plants see 15a	X			
13. Wetlands (W), including abandoned wetlands, or Farmed Wetlands (FW). Wetlands may be farmed under natural conditions. Farmed Wetlands may be farmed and maintained in the same manner as they were prior to December 23, 1985, as long as they are not abandoned.			UN-4, UN-5	3.1
14. Prior Converted Wetlands (PC) - The use, management, drainage, and alteration of prior converted wetlands (PC) are not subject to FSA unless the area reverts to wetland as a result of abandonment. You should inform SCS of any area to be used to produce an agricultural commodity that has not been cropped, managed, or maintained for 5 years or more.				
Artificial Wetland (AW) - Artificial Wetlands includes irrigated induced wetlands. These Wetlands are not subject to FSA.				
15. Minimal Effect Wetland (MW) - These wetlands are to be farmed according to the minimal effect agreement signed at the time the minimal effect determination was made.				
5a NON-EXEMPTED WETLANDS: (W) wooded wetlands			UN-1, UN-2, UN-3	174.2
16. Converted Wetlands (CW) - In any year that an agricultural commodity is planted on these Converted Wetlands, you will be ineligible for USDA benefits. If you believe that the conversion was commenced before December 23, 1985, or that the conversion was caused by a third party, contact the ASCS office for a commenced or third party determination.				
17. The planned alteration measures on wetlands in fields with FSA, _____ are considered maintenance and are in compliance				
18. The planned alteration measures on wetlands in fields _____ are not considered to be maintenance and if installed will cause the area to become a Converted Wetland (CW). See Item 16 for information on CW.				

19. This wetland determination was completed in the office ☒ Field ☐20. This determination was delivered ☐ Mailed ☒ To the Person on Date: 2/22/88

NOTE: If you do not agree with this determination, you may request a reconsideration from the person that signed this form in block 22 below. The reconsideration is a prerequisite for any further appeal. The request for the reconsideration must be in writing and must state your reasons for the request. The request must be mailed or delivered within 15 days after this determination is mailed to or otherwise made available to you. Please see reverse side of the producer's copy of this form for more information on appeals procedure.

NOTE: If you intend to convert additional land to cropland, or alter any wetlands you must initiate another form AD-1026 at the local office of ASCS. Abandonment is where land has not been cropped, managed, or maintained for 5 years or more. You should inform SCS if you plan to produce an agricultural commodity on abandoned wetlands.

21. Remarks UN-1 = 9.3
UN-2 = 142.6 } are wooded wetlands
UN-3 = 23.3
UN-4 (2.1)
UN-5 (1.0) } are non-wooded wetlands.

22. Signature of SCS District Conservationist

Mal K. Gorda

170
174 - 174 AC
23. Date 2/22/88 ✓

HIGHLY ERODIBLE LAND AND WETLAND
CONSERVATION DETERMINATION

1. Name and Address of Person

Dennis Love
Rt 1, Box 221A
Rayville, LA 71269

2. Date of Request

11/2/87

3. County

Richland

4. Name of USDA Agency or Person Requesting Determination

EMHA

5. Farm No. and Tract No.

2299 959

SECTION I - HIGHLY ERODIBLE LAND

6. Is soil survey now available for making a highly erodible land determination?	Yes	No	Field No.(s)	Total Acres
7. Are there highly erodible soil map units on this farm?	X			
8. List highly erodible fields that, according to ASCS records, were used to produce an agricultural commodity in any crop year during 1981-1985.		X		
9. List highly erodible fields that have been or will be converted for the production of agricultural commodities and, according to ASCS records, were not used for this purpose in any crop year during 1981-1985; and were not enrolled in a USDA set-aside or diversion program.				
10. This Highly Erodible Land determination was completed in the: Office <input type="checkbox"/> Field <input checked="" type="checkbox"/>				

NOTE: If you have highly erodible cropland fields, you may need to have a conservation plan developed for these fields. For further information, contact the local office of the Soil Conservation Service.

SECTION II - WETLAND

11. Are there hydric soils on this farm?	Yes	No	Field No.(s)	Total Wetland Acres
12. Wetlands (W), including abandoned wetlands, or Farmed Wetlands (FW). Wetlands may be farmed under natural conditions. Farmed Wetlands may be farmed and maintained in the same manner as they were prior to December 23, 1985, as long as they are not abandoned.	X			
13. Prior Converted Wetlands (PC) - The use, management, drainage, and alteration of prior converted wetlands (PC) are not subject to FSA unless the area reverts to wetland as a result of abandonment. You should inform SCS of any area to be used to produce an agricultural commodity that has not been cropped, managed, or maintained for 5 years or more.				
14. Artificial Wetlands (AW) - Artificial Wetlands includes irrigation induced wetlands. These Wetlands are not subject to FSA.				
15. Minimal Effect Wetlands (MW) - These wetlands are to be farmed according to the minimal effect agreement signed at the time the minimal effect determination was made.				
16. Converted Wetlands (CW) - In any year that an agricultural commodity is planted on these Converted Wetlands, you will be ineligible for USDA benefits. If you believe that the conversion was commenced before December 23, 1985, or that the conversion was caused by a third party, contact the ASCS office to request a commenced or third party determination.			UN-1	23.6

NON-EXEMPTED WETLANDS:

Wooded Wetland

17. The planned alteration measures on wetlands in fields _____ are considered maintenance and are in compliance with FSA.

18. The planned alteration measures on wetlands in fields _____ are not considered to be maintenance and if installed will cause the area to become a Converted Wetland (CW). See item 16 for information on CW.

9. This wetland determination was completed in the: Office ☐ Field ☒10. This determination was: Delivered ☐ Mailed ☒ To the Person on Date: 2/19/88

NOTE: If you do not agree with this determination, you may request a reconsideration from the person that signed this form in Block 22 below. The reconsideration is a prerequisite for any further appeal. The request for the reconsideration must be in writing and must state your reasons for the request. The request must be mailed or delivered within 15 days after this determination is mailed to or otherwise made available to you. Please see reverse side of the producer's copy of this form for more information on appeals procedure.

NOTE: If you intend to convert additional land to cropland, or alter any wetlands you must initiate another Form AD-1026 at the local office of ASCS. Abandonment is where land has not been cropped, managed, or maintained for 5 years or more. You should inform SCS if you plan to produce an agricultural commodity on abandoned wetlands.

1. Remarks: Determination made on cropland and wetland on wetland as on non-cropland.

2. Signature of SCS District Conservationist

Mark Jordan

23. Date

2/15/88

HIGHLY ERODIBLE LAND AND WETLAND CONSERVATION DETERMINATION

James D. Rawls # 12/11/88
A+ 2, Box 250
Rayville, La 71269 Richland
3. County

4. Name of USDA Agency or Person Requesting Determination

Fm HA

5. Farm No. and Tract No.

2299

754

SECTION I - HIGHLY ERODIBLE LAND

6. Is soil survey now available for making a highly erodible land determination?	Yes	No	Field No.(s)	Total Acres
7. Are there highly erodible soil map units on this farm?	X			
8. List highly erodible fields that, according to ASCS records, were used to produce an agricultural commodity in any crop year during 1981-1985.	X			
9. List highly erodible fields that have been or will be converted for the production of agricultural commodities and according to ASCS records, were not used for this purpose in any crop year during 1981-1985; and were not enrolled in a USDA set-aside or Diversion Program.				
10. This Highly Erodible Land determination was completed in the office <input checked="" type="checkbox"/> Field <input type="checkbox"/>				

NOTE: If you have highly erodible cropland fields, you may need to have a conservation plan developed for these fields. For further information, contact local office of the Soil Conservation Service.

SECTION II - WETLAND

11. Are there hydric soils on this farm?	Yes	No	Field No.(s)	Total Wetland Acres
12. Wetlands (W), including abandoned wetlands, or Farmed Wetlands (FW). Wetlands may be farmed under natural conditions. Farmed Wetlands may be farmed and maintained in the same manner as they were prior to December 23, 1985, as long as they are not abandoned.	X			
13. Prior Converted Wetlands (PC) - The use, management, drainage, and alteration of prior converted wetlands (PC) are not subject to FSA unless the area reverts to wetland as a result of abandonment. You should inform SCS of any area to be used to produce an agricultural commodity that has not been cropped, managed, or maintained for 5 years or more.				
14. Artificial Wetland (AW) - Artificial Wetlands includes irrigated induced wetlands. These Wetlands are not subject to FSA.				
15. Minimal Effect Wetland (MW) - These wetlands are to be farmed according to the minimal effect agreement signed at the time the minimal effect determination was made.				
16. Converted Wetlands (CW) - In any year that an agricultural commodity is planted on these Converted Wetlands, you will be ineligible for USDA benefits. If you believe that the conversion was commenced before December 23, 1985, or that the conversion was caused by a third party, contact the ASCS office for a commenced or third party determination.			WN-1,2	141.6

17. The planned alteration measures on wetlands in fields ☐ are considered maintenance and are in compliance with FSA.

18. The planned alteration measures on wetlands in fields ☐ are not considered to be maintenance and it is anticipated that the area will become a Converted Wetland (CW). See item 16 for information on CW.

19. This wetland determination was completed in the office ☒ Field ☐

20. This determination was delivered ☐ Mailed ☒ To the Person on Date: 2/4/88

NOTE: If you do not agree with this determination, you may request a reconsideration from the person that signed this form in block 22 below. The reconsideration is a prerequisite for any further appeal. The request for the reconsideration must be in writing and must state your reasons for the request. The request must be mailed or delivered within 15 days after this determination is mailed to or otherwise made available to you. Please see reverse side of the producer's copy of this form for more information on appeals procedure.

NOTE: If you intend to convert additional land to cropland, or alter any wetlands you must initiate another form AD-1026 at the local office of ASCS. Abandonment is where land has not been cropped, managed, or maintained for 5 years or more. You should inform SCS if you plan to produce an agricultural commodity on abandoned wetlands.

21. Remarks

Determination made on cropland and wetlands on the highly erodible land does not make up 1/3 of the fields. Wetlands on non-cropland.

22. Signature of SCS District Conservationist

Mark R. Jordan

23. Date

2/4/88

APPENDIX B

SOIL SURVEY REPORT



Map Scale: 1:11,400 if printed on A size (8.5" x 11") sheet.



MAP LEGEND

Area of Interest (AOI)

Area of Interest (AOI)

Soils

Soil Map Units

Special Point Features

Blowout

Borrow Pit

Clay Spot

Closed Depression

Gravel Pit

Gravelly Spot

Landfill

Lava Flow

Marsh or swamp

Mine or Quarry

Miscellaneous Water

Perennial Water

Rock Outcrop

Saline Spot

Sandy Spot

Severely Eroded Spot

Sinkhole

Slide or Slip

Sodic Spot

Spoil Area

Stony Spot

Very Stony Spot

Wet Spot

Other

Special Line Features

Gully

Short Steep Slope

Other

Political Features

Cities

Water Features

Streams and Canals

Transportation

Rails

Interstate Highways

US Routes

Major Roads

Local Roads

MAP INFORMATION

Map Scale: 1:11,400 if printed on A size (8.5" x 11") sheet.
The soil surveys that comprise your AOI were mapped at 1:24,000.

Warning: Soil Map may not be valid at this scale.

Enlargement of maps beyond the scale of mapping can cause misunderstanding of the detail of mapping and accuracy of soil line placement. The maps do not show the small areas of contrasting soils that could have been shown at a more detailed scale.

Please rely on the bar scale on each map sheet for accurate map measurements.

Source of Map: Natural Resources Conservation Service
Web Soil Survey URL: <http://websoilsurvey.nrcs.usda.gov>
Coordinate System: UTM Zone 15N NAD83

This product is generated from the USDA-NRCS certified data as of the version date(s) listed below.

Soil Survey Area: Richland Parish, Louisiana
Survey Area Data: Version 6, Apr 2, 2008

Date(s) aerial images were photographed: Data not available.

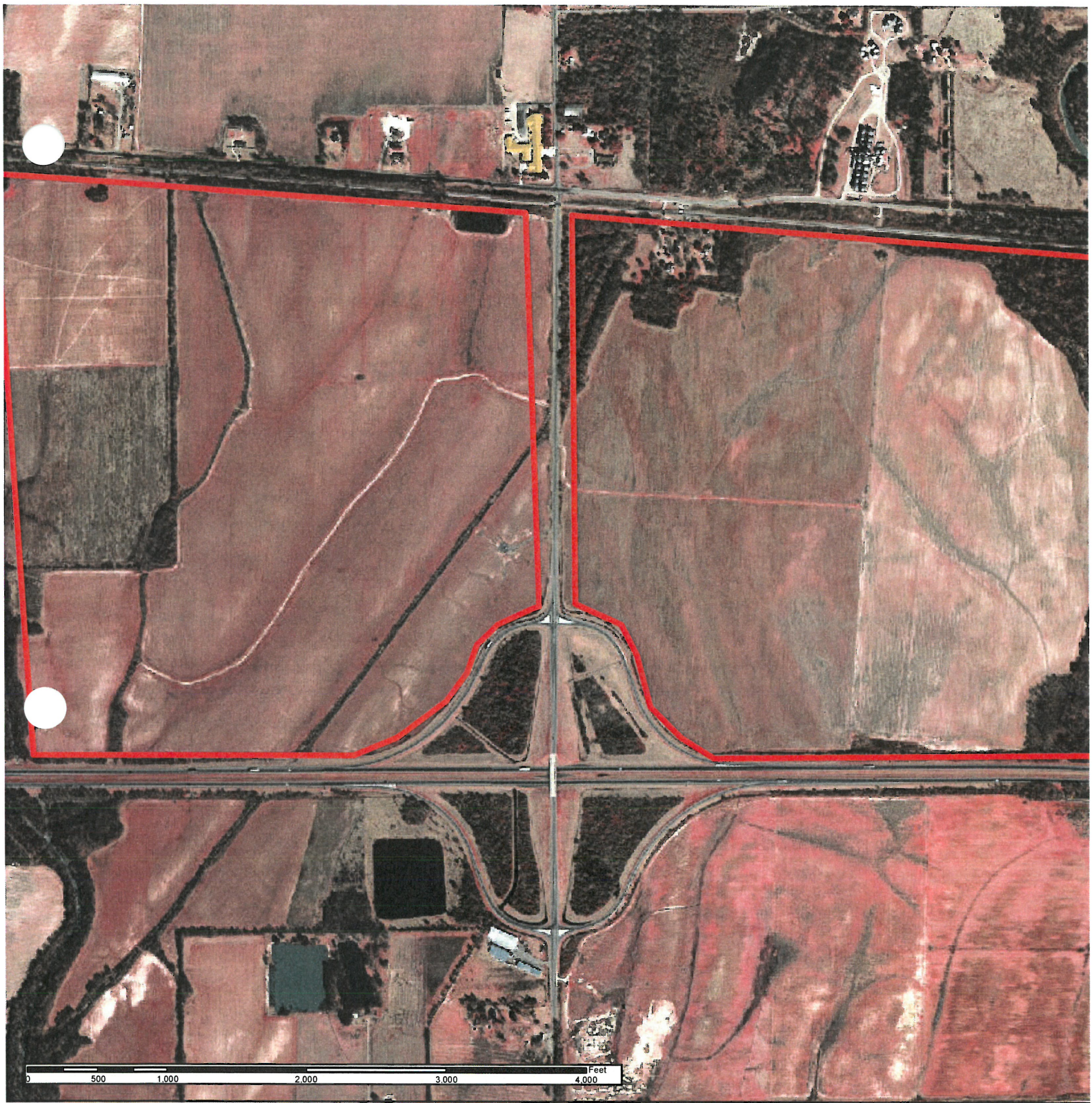
The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background imagery displayed on these maps. As a result, some minor shifting of map unit boundaries may be evident.

Map Unit Legend

Richland Parish, Louisiana (LA083)			
Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
Da	Deerford silt loam	0.5	0.1%
De	Dexter silt loam, 1 to 3 percent slopes	18.3	4.2%
Df	Dexter silt loam, 3 to 5 percent slopes	9.8	2.2%
Fr	Forestdale silty clay loam	5.9	1.3%
Gg	Gigger-Gilbert silt loams, gently undulating	177.6	40.4%
Gk	Gilbert silt loam	169.2	38.5%
Gm	Gilbert-Egypt silt loams, gently undulating	47.5	10.8%
Pe	Perry clay, occasionally flooded	10.0	2.3%
W	Water	1.0	0.2%
Totals for Area of Interest		439.7	100.0%

APPENDIX C

2004 COLOR INFRARED PHOTOGRAPHY



APPENDIX D

USFWS NATIONAL WETLAND MAPPING



U.S. Fish and Wildlife Service

National Wetlands Inventory

sit



We



This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.

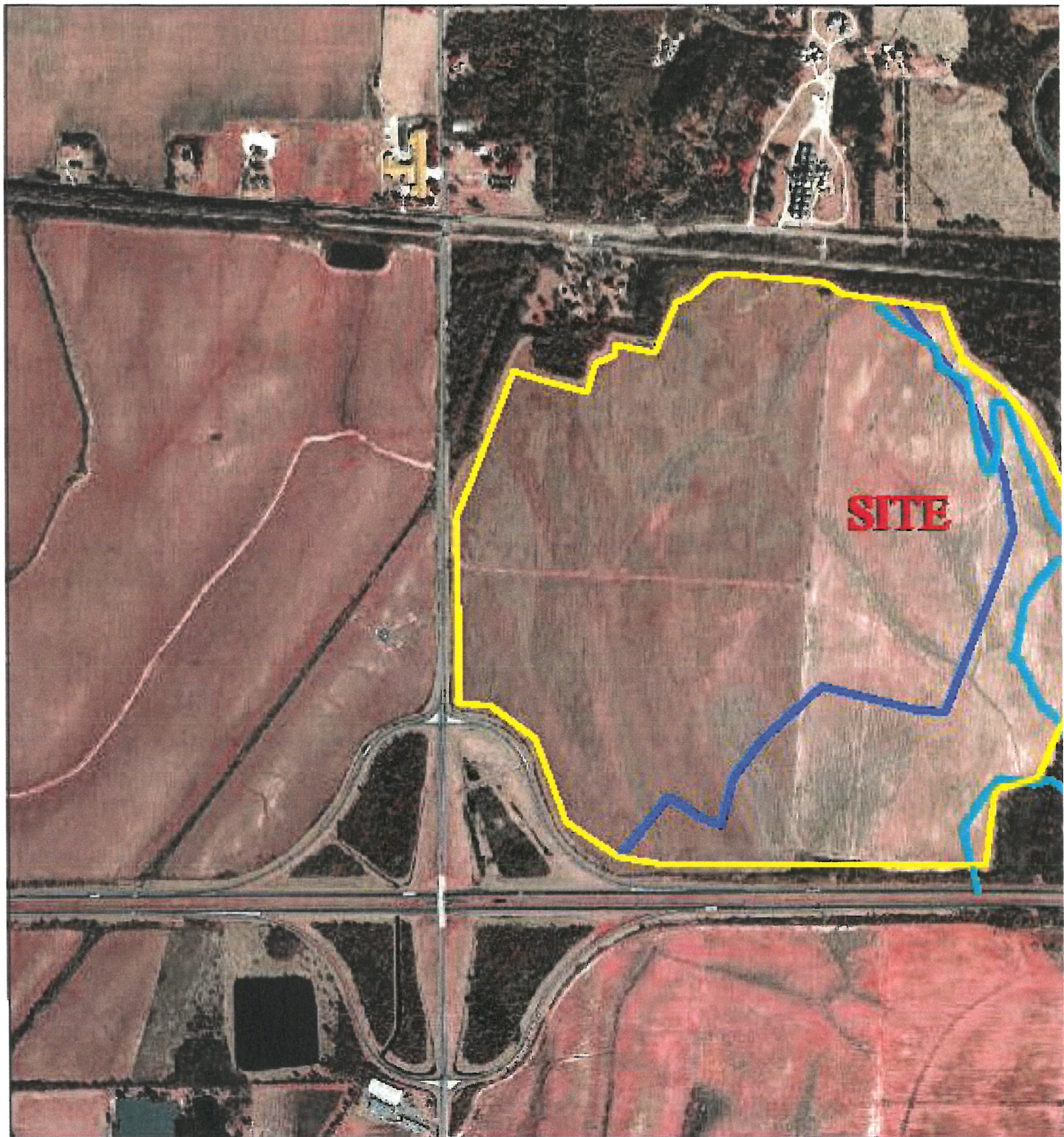
User Remarks:

APPENDIX E

FEMA 100-YEAR FLOODPLAIN MAPS

SIZE 259.5 ACRES
WETLANDS: 0 ACRES

OUT OF CURRE
OUT OF NEW F



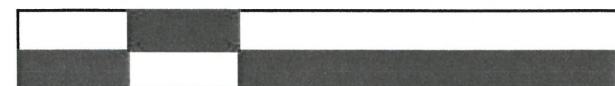
ZONE A: 100 YEAR FLOOD AREAS
NO BASE FLOOD ELEVATION DETERMINED.

SOURCE, FEMA, FLOOD INSURANCE MAP, RICHLAND PARISH, 1998



ZONE A: 100 YEAR FLOOD AREAS
NO BASE FLOOD ELEVATION DETERMINED.

SOURCE, FEMA, FLOOD INSURANCE STUDY, RICHLAND PARISH, 2013, PROJECTED EFFECTIVE, SEPT. 2013



0 500 1000

APPENDIX E

LIDAR DATA

