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October 26, 2020

To: Orange County Board of County Commissioners, Planning Department, and County Managers Office,

The proposed 100-acre Efland Station, consisting of approximately 500,000 sq. ft. of building area, would occupy parcels that drain into two tributaries of Sevenmile Creek, a primary tributary of the Eno River. Sevenmile Creek is part of the State-defined Upper Eno Watershed, a class WS-II watershed with High Quality and Nutrient Sensitive Water designation, serving as a public water supply for Hillsborough residents. The streams lay within the Upper Eno Protected Watershed on the property, and within the Upper Eno Critical Watershed immediately after leaving the property.

The Buc-ees component of this proposal has the most significant potential for negative impacts on the immediate and downstream environments. The extensive amount of impervious surface and the associated runoff, in conjunction with the high volume of vehicular traffic, will surely deposit high levels of sediment, toxic chemicals, heavy metals and other pollutants into our waterways and drinking water. Due to the extent of this environmental impact, and the importance of these tributaries to water quality and species of Sevenmile Creek and the Eno River, it is critical to protect the areas around these tributaries and associated ponds and wetlands, as an extension of the site's open space.

We understand that stormwater controls are being proposed to help mitigate runoff issues. However, two of the stormwater controls on the plan are located within the designated "Preserved Green Space Area." Control structures of this magnitude would require significant disturbance, and by the very definition not be "preserved." These "preserved" areas should not include stormwater controls, roads, utilities, or any other disturbance. The potential runoff issues, as well as the necessary fuel storage to support 120 gas pumps and the potential for storage failure, are of utmost concern.

The Eno River Association, alongside residents of Orange County, is seeing a high volume of rezoning requests for high density development in our watershed. We ask the Board of County Commissioners to uphold the current zoning designations as identified in the Unified Development Ordinance. Current zoning districts were assigned to meet the need for sustainable growth, while upholding citizens' rights to a healthy environment and drinking water. Rezoning requests such as the Efland Station project should only be granted if the proposed change would improve the lives of citizens and preserve the environment.

While development is important to our communities, it must be done in a way that fits with existing uses and preserves our natural assets. For this reason, the Eno River Association is opposed to the proposed Efland Station.

Respectfully,

A handwritten signature in blue ink that reads "Jessica L. Sheffield".

Jessica L. Sheffield, Executive Director

