



REPLY TO  
ATTENTION OF

DEPARTMENT OF THE ARMY  
SAVANNAH DISTRICT, CORPS OF ENGINEERS  
100 W. OGLETHORPE AVENUE  
SAVANNAH, GEORGIA 31401-3640

Regulatory Division  
SAS-2011-00675

~~FEBRUARY~~ 18 2014

**JOINT PUBLIC NOTICE**  
**Savannah District/State of Georgia**

The Savannah District has received an application for a Department of the Army Permit, pursuant to Section 404 of the Clean Water Act (33 U.S.C. 1344), as follows:

Application Number: SAS-2011-00675

Applicant: Mr. Ocie L. Vest  
SLF IVC- GA Altama, LLC  
5949 Sherry Lane, Suite 1750  
Dallas, Texas 75225

Agent: Mr. Daniel H. Bucey  
Resource & Land Consultants, LLC.  
41 Park of Commerce Way, Suite 303  
Savannah, Georgia 31405

Location of Proposed Work: The project site is a 5,621-acre property located at the intersection of Interstate 95 and State Route 99, in the City of Brunswick, Glynn County, Georgia (Latitude 31.3270, Longitude -81.4992).

Description of Work Subject to the Jurisdiction of the U.S. Army Corps of Engineers: The proposed impacts are to 9.66 acres of jurisdictional waters to facilitate the construction of a mixed-use development. The impacts are associated with access roads, utilities, and stormwater management facilities.

As compensatory mitigation for the project related to unavoidable jurisdictional waters impacts, the applicant is proposing to purchase 114.9 wetland mitigation credits from the Wilkinson-Oconee Mitigation Bank.

**BACKGROUND**

A jurisdictional determination (JD) was verified by letter dated July 23, 2012, for the 5,621 acre tract. The determination resulted in the identification of 2,991.9 acres of upland, 529.03 acres of jurisdictional wetland, 12.57 acres of open water (abandoned

and naturalized borrow pits), and 1,955.10 acres of tidal wetland adjacent to the Altamaha River. Twenty-three (23) wetlands with a total area of 20.49 acres were determined to be isolated non-jurisdictional. The total amount of jurisdictional wetland impacts associated with the applicants proposed project would be 9.66 acres of wetland and 1.74 acres of isolated, non-jurisdictional wetland.

This Joint Public Notice announces a request for authorizations from both the U.S. Army Corps of Engineers and the State of Georgia. The applicant's proposed work may also require local governmental approval.

## **STATE OF GEORGIA**

Water Quality Certification: The Georgia Department of Natural Resources, Environmental Protection Division, intends to certify this project at the end of 30 days in accordance with the provisions of Section 401 of the Clean Water Act, which is required for a Federal Permit to conduct activity in, on, or adjacent to the waters of the State of Georgia. Copies of the application and supporting documents relative to a specific application will be available for review and copying at the office of the Georgia Department of Natural Resources, Environmental Protection Division, Water Protection Branch, 4220 International Parkway, Suite 101, Atlanta, Georgia 30354, during regular office hours. A copier machine is available for public use at a charge of 25 cents per page. Any person who desires to comment, object, or request a public hearing relative to State Water Quality Certification must do so within 30 days of the State's receipt of application in writing and state the reasons or basis of objections or request for a hearing. The application can be reviewed in the Savannah District, U.S. Army Corps of Engineers, Regulatory Division, 100 W. Oglethorpe Avenue Savannah, Georgia 31401-3640.

State-owned Property and Resources: The applicant may also require assent from the State of Georgia, which may be in the form of a license, easement, lease, permit or other appropriate instrument.

Georgia Coastal Management Program: Prior to the Savannah District U.S. Army Corps of Engineers making a final permit decision on this application, the project must be certified by the Georgia Department of Natural Resources, Coastal Resources Division, to be consistent with applicable provisions of the State of Georgia Coastal Management Program (15 CFR 930). Anyone wishing to comment on Coastal Management Program certification of this project should submit comments in writing within 30 days of the date of this notice to the Federal Consistency Coordinator, Ecological Services Section, Coastal Resources Division, Georgia Department of Natural Resources, One Conservation Way, Brunswick, Georgia 31523-8600 (Telephone 912-264-7218).

## U.S. ARMY CORPS OF ENGINEERS

The Savannah District must consider the purpose and the impacts of the applicant's proposed work, prior to a decision on issuance of a Department of the Army Permit.

Cultural Resources Assessment: Pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended, we request the Georgia Historical Preservation Division (HPD) or any other interested party review the latest published version of the National Register of Historic Places to determine if the property has or has not any registered properties or properties listed as eligible for inclusion located at the site or in the area affected by the proposed work. Presently unknown archaeological, scientific, prehistorical, or historical data may be located at the site and could be affected by the proposed work.

A Phase I cultural resource survey was conducted by Webb & Associate in 2011. The report indicates that all sites found and identified were determined to be eligible for listing on the National Register. The applicant states that their preferred project would avoid all cultural resources. The Corps is currently reviewing the survey report and preparing an effects determination for coordination with HPD.

Endangered Species: Pursuant to Section 7(c) of the Endangered Species Act of 1973, as amended (16 U.S.C. 1531 et seq.), we request information from the U.S. Department of the Interior, Fish and Wildlife Service, the U.S. Department of Commerce, the National Oceanic and Atmospheric Administration, and the National Marine Fisheries Service; or, any other interested party, on whether any species listed or proposed for listing may be present in the area.

The consultant identified several grass ponds and forested wetlands that could be suitable breeding habitat for the flatwoods salamander (*Ambystoma cingulatum*). A site specific investigation by consulting herpetologists John Palis & Dirk Stevenson was conducted in 2008. The Corps has reviewed the report and has determined that there would be no effect to this species.

In addition, the tidal wetlands and brackish marshes of the Altamaha River are suitable habitat for the Bald Eagle (*Haliaeetus leucocephalus*) and wood stork (*Mycteria Americana*). A bald eagle's nest is located on the subject property and the consultant states that appropriate buffers would be in place at the nest site in accordance with the *National Bald Eagle Management Guidelines*, March 2007. Presently, there were no wood storks sited, nor is there any knowledge of any rookery sites on the subject property, but the area could potential be foraging habitat. As such, the Corps is making a may affect, not likely to adversely affect determination on the wood stork. Pursuant to Section 7(c) of the Endangered Species Act of 1973, as amended (16 U.S.C. 1531 et seq.), we request concurrence with this effects determination.

The upland sandhill habitat could potentially harbor the federally listed eastern indigo snake (*Drymarchon couperi*). The consultant identified several gopher tortoise (*Gopherus polyphemus*), a candidate species, burrows scattered throughout the subject property, with two (2) dense colonies (approximately 40 to 60 burrows) located in young long-leaf pine (*Pinus palustris*) plantations on the subject property. These areas, as well as the less dense burrow concentrations, were intensively surveyed for the presence of the indigo snake during the appropriate winter months beginning in 2008 (Palis & Stevenson) and in 2010 and 2011 by the consultant. In winter 2013, Palis conducted a follow up investigation. The consultant also conducted an investigation in late 2013. They report, no specimens or evidence thereof were encountered, and it is likely that they do not exist on the subject property. Therefore the Corps is making a no effect determination for this species.

Lastly, the subject property borders the Altamaha River, which could harbor the federally endangered shortnose sturgeon (*Acipenser brevirostrum*). As there are no activities proposed in the river or wetlands adjacent to the river, the Corps is making a no effect determination for this species.

Public Interest Review: The decision whether to issue a permit will be based on an evaluation of the probable impact including cumulative impacts of the proposed activity on the public interest. That decision will reflect the national concern for both protection and utilization of important resources. The benefit, which reasonably may be expected to accrue from the proposal, must be balanced against its reasonably foreseeable detriments. All factors, which may be relevant to the proposal will be considered including the cumulative effects thereof; among those are conservation, economics, aesthetics, general environmental concerns, wetlands, historic properties, fish and wildlife values, flood hazards, flood plain values, land use, navigation, shoreline erosion and accretion, recreation, water supply and conservation, water quality, energy needs, safety, food and fiber production, mineral needs, considerations of property ownership and in general, the needs and welfare of the people.

Consideration of Public Comments: The U.S. Army Corps of Engineers is soliciting comments from the public; federal, state, and local agencies and officials; Native American Tribes; and other interested parties in order to consider and evaluate the impacts of this proposed activity. Any comments received will be considered by the U.S. Army Corps of Engineers to determine whether to issue, modify, condition or deny a permit for this proposal. To make this decision, comments are used to assess impacts on endangered species, historic properties, water quality, general environmental effects, and the other public interest factors listed above. Comments are used in the preparation of an Environmental Assessment and/or an Environmental Impact Statement pursuant to the National Environmental Policy Act. Comments are also used to determine the need for a public hearing and to determine the overall public interest of the proposed activity.

Application of Section 404(b)(1) Guidelines: The proposed activity involves the discharge of dredged or fill material into the waters of the United States. The Savannah District's evaluation of the impact of the activity on the public interest will include application of the guidelines promulgated by the Administrator, Environmental Protection Agency, under the authority of Section 404(b) of the Clean Water Act.

Public Hearing: Any person may request, in writing, within the comment period specified in this notice, that a public hearing be held to consider this application for a Department of the Army Permit. Requests for public hearings shall state, with particularity, the reasons for requesting a public hearing. The decision whether to hold a public hearing is at the discretion of the District Engineer, or his designated appointee, based on the need for additional substantial information necessary in evaluating the proposed project.

Comment Period: Anyone wishing to comment on this application for a Department of the Army Permit should submit comments in writing to the U.S. Army Corps of Engineers, Savannah District, Attention: Dr. Forrest B. Vanderbilt, 100 W. Oglethorpe Avenue, Savannah, Georgia 31401-3640, no later than 30 days from the date of this notice. Please refer to the applicant's name and the application number in your comments.

If you have any further questions concerning this matter, please contact Dr. Forrest Vanderbilt, Regulatory Specialist, Coastal Branch at 912-652-5051.

Enclosures

1. Applicants Proposed Project and Alternatives Analysis
2. Altama USGS Topography Map
3. U.S.A.C.E Jurisdictional and Non-Jurisdictional Wetlands Management Plan of Altama

# ALTAMA

## PROPOSED MIXED-USE DEVELOPMENT

Brunswick, Glynn County, Georgia

SAS-2011-00675

February 3, 2014

### 1.0 INTRODUCTION:

SLF IV – GA Altama, LLC (Applicant) is seeking authorization to impact 9.66 acres of jurisdictional wetlands to facilitate the construction of a mixed-use development on a 5,621-acre property located at the intersection of Interstate 95 and State Route 99, in Brunswick, Glynn County, Georgia (Figure 1, page 2). The proposed impacts are required for access roads, utilities, and stormwater management facilities. Due to the length of time typically required to develop large tracts of land, the applicant is requesting a permit term of 20-years.

### 2.0 PROJECT PURPOSE & NEED:

The purpose of the proposed project is to provide new residential, retail, and commercial buildings. The need for this development is driven by the demand for high-quality housing, retail, and commercial space in proximity to the coast of Georgia. This area is near two major ports and major transportation, and has an excellent climate. According to *Moody's Analytics Brunswick Data*, by 2017 the population in the Brunswick area is projected to grow by 7%, household growth is expected rise by 7%, gross metro product is expected to increase by 30%, mortgage purchase originations are expected to rise by 85%, and median household income is projected to rise by 21%. Another study conducted by the Georgia Institute of Technology's Center for Quality Growth and Regional Development, entitled, *Georgia Coast 2030: Population Projections for the 10-county Coastal Region*, found that in-state migration is likely to be the driving factor for growth in the area, with a projected increase in population of 51 percent from year 2000 to 2030. The factors identified for this projected growth included climate, cost of living, and coastal resources and amenities. After reviewing the projected growth for the area, the Applicant identified the need for new housing in a large carefully master-planned development in proximity to the coast and purchased the subject property after reviewing several other properties in the identified market. The site selection process is discussed in Section 5, *Alternate Site Analysis*.

**2.1 Basic Project Purpose:** The basic project purpose is to fill and/or excavate in wetlands for access roads, utility lines, and stormwater management for a mixed-use residential/commercial development. Since a mixed-use development does not require location in or near a water body, it would not be considered a water-dependent activity. Clean Water Act Section 404(b)(1) guidelines presume that for a project that is not water dependent, a practicable alternative exists that would satisfy the project without impacts to jurisdictional waters. However, the overall project purpose, stated in Section 2.2, further defines the specific geographic criteria that were utilized by the applicant to determine that the preferred project site is the least environmentally damaging practicable alternative.

**2.2 Overall Project Purpose:** The overall project purpose is to construct a large, long-term master-planned mixed-use development in coastal Georgia along the I-95 corridor, in the area referred to as the Golden Isles, between Brunswick and Jacksonville, which provides a desirable opportunity to live, work and recreate in a coastal setting. Raw-land development opportunities decrease and competition increases as you approach the Savannah and Jacksonville markets, and therefore the Golden Isles area was chosen as most practicable area in which to commence a large scale master-planned development.

### 3.0 EXISTING SITE CONDITIONS:

Generally, there are two (2) upland habitat types and seven (7) wetland habitats found on the subject property (refer to Figure 2, page 3):

1. Upland pine plantation
2. Upland hardwoods
3. Thinned hardwood wetlands, scrub-shrub needle leaved deciduous (PSS2C)
4. Forested hardwood wetlands, needle-leaved deciduous/needle-leaved evergreen



- (PFO2/4C)
- 5. Forested hardwood wetlands, broad-leaved evergreen/needle-leaved evergreen (PFO3/4C)
- 6. Emergent wetlands (PEM1C)
- 7. Forested hardwood wetlands, Altamaha river swamp (PFO6T)
- 8. Freshwater marsh, Altamaha river swamp, (PEM1R)
- 9. Borrow Pit and ditch (PUBHx, PUBWx)

The project site consists of habitats typically found in undeveloped areas in the coastal plain region of Georgia. The majority of the subject property consists of managed pine plantation upland, with scattered stands of mixed upland hardwood forest. The subject property is bound to the north by the South Branch of the Altamaha River and its adjacent hardwood swamp and freshwater tidal marshes. Numerous non-tidal hardwood swamps are found mainly concentrated in the southern and western portion of the property. The majority of the planted pines have been thinned since 2008.

A Jurisdictional Determination for the subject property was issued by the Savannah District on July 23, 2012. The determination resulted in the identification of 2,991.9 acres of upland, 529.03 acres of jurisdictional wetland, 12.566 acres of borrow pits, and +/-1,955.10 acres of swamp adjacent to the Altamaha River. Twenty-three (23) wetlands with a total area of 20.49 acres were determined to be isolated non-jurisdictional. The limits of jurisdiction were surveyed by Shupe Surveying Company, P.C., and a copy of the determination letter and boundary / wetland survey is included as Attachment B.

The development received Development of Regional Impact approval through the state on February 13, 2008. Glynn County Board of Commissioners (GCBOC) provided Planned Development (PD) approval on September 9, 2008. The original approved density for the entire northwest quadrant PD was 17,459 Development Units (DU), 708 acres of Freeway Commercial (FC), and 286 acres of commercial development. On July 21, 2011, the GCBOC approved a modification of the PD to allow for 11,125 development units, 275 acres of FC, and 545 acres of commercial development within the Altama Tract portion of the original northwest quadrant PD.

**4.0 PROPOSED PROJECT:**

The master-planned development for the subject property was developed by Witmer-Jones-Keefer, Ltd. and Thomas & Hutton (Attachment C, Sheets 1 through 49). The proposed project will require impacts to 3.96 acres of wetland for road and utility crossings, 2.89 acres of ditch for road and lot construction, 0.47 acres of ditch for lagoon creation, and 2.27 acres of wetland for stormwater outfalls. Approximately 21 acres of isolated non-jurisdictional wetlands will also be impacted for lot development and lagoon construction.

The 3.96 acres of road crossings are proposed at existing forest road crossings or are located to cross the wetlands at the narrowest widths practical at sixteen locations across the subject property. Filling of wetlands on site are limited to road crossings only; no fill in jurisdictional wetlands is proposed for lot development. However, lot fill is proposed in 2.89 acres of jurisdictional ditches that have been excavated in uplands for past forest management. Utility crossings are proposed to be placed alongside the road crossings to minimize additional wetland clearing impacts. The minimal amount of stormwater outfalls are proposed in wetland locations across the subject property. The outfalls must be located in wetlands to reach lower elevations necessary to allow positive drainage of the uplands. The outfall locations shown are approximate, and the applicant is requesting flexibility for minor shifts in their location based upon final elevation determinations and final platting of lots. Although minor shifts in outfall locations may be necessary, the total amount of requested impacts will not be exceeded. All roads and drainage features will be designed to prevent draining of wetland areas. Water and sewer service for the subject property will be provided by Glynn County.

While only 9.66 acres of jurisdictional wetland will be impacted, approximately 360 acres of lagoons will be created across the project area. These lagoons will provide habitat for fish, reptiles, amphibians, and waterfowl while at



the same time improving water quality functions as part of the master stormwater management plan.

**5.0 ALTERNATIVES ANALYSIS:**

Prior to proposing this project, the Applicant considered numerous alternatives to satisfy the overall project purpose. These alternatives included a no action alternative, alternative sites within the identified project area, and construction of the project on the proposed property with alternative designs. As stated in Section 2.0, the Applicant identified the coastal Georgia region for the potential growth projected by numerous studies conducted by third parties. In order to maximize potential return on investment capital and reduce duplicative development and infrastructure costs, the applicant chose to pursue available large tracts of land at least 1,500 acres in size. Larger tracts with more units, once properly entitled, provide longer term cash flow opportunities without the need to duplicate start-up costs.

The preferred site was initially identified due to its availability, large size, proximity to infrastructure, and expansive natural areas. Site selection alternatives were evaluated based upon geographic location, tract size, availability at the time of study, proximity to existing transportation, availability of utilities, cost, and potential wetland impacts.

Prior to selecting the preferred site, the Applicant reviewed other large properties within the vicinity of the identified geographic search area. Three additional sites that could be considered practicable alternatives were identified; a 1,816 acre site located in Camden County west of I-95, a 9,344 acre located in Camden County east of I-95, and 3,343 acre tract located in Glynn County west of I-95. As depicted in *Table 1: Alternate Site Comparison*, the preferred alternative represents the least environmentally damaging practicable alternative. The preferred site would result in the least amount of wetland impacts and ranked the highest in each of the site comparison categories.

**TABLE 1  
ALTERNATE SITE COMPARISON**

<b>FACTORS</b>	<b>PREFERRED ALTERNATE</b>	<b>ALTERNATE 1</b>	<b>ALTERNATE 2</b>	<b>ALTERNATE 3</b>
AVAILABILITY	YES	YES	YES	YES
SIZE	5,621	1,816	9,344	3,343
EASE OF ACCESS	HIGH	HIGH	HIGH	MODERATE
LOCATION	HIGH	HIGH	HIGH	MODERATE
COST	MODERATE	MODERATE	MODERATE	MODERATE
UTILITIES	AT SITE	NEAR	NO	NEAR
RETURN ON INVESTMENT	HIGH	MODERATE	MODERATE	MODERATE
WETLAND IMPACT (ACRES)	9.66	51.71	14.5	11.3
LEAST ENVIRONMENTALLY DAMAGING PRACTICABLE ALTERNATE THAT MEETS OVERALL PROJECT PURPOSE	YES	NO	NO	NO

**5.1 No Action:**

Based upon current market projections for this part of the southeast, future housing needs will require developers who can propose and follow through on developing tracts suitable for large scale single-family housing. While the No Action alternative would result in no direct or indirect environmental impacts, this alternative would not meet the overall project purpose and would result in the lost opportunity to the





Applicant to satisfy the projected needs for housing in the years to come and the loss of investment opportunity. This alternative was dismissed by the applicant and was given no further consideration.

**5.2 Alternate Site 1:** This 1,816 acre site is located in Camden County, Georgia. The site contains +/-563 acres of wetlands and +/-1,252 acres of uplands. The site was available, met the minimum size requirement, and was located in close proximity to Interstate 95. The site was located in the identified geographic search area, and was available at a cost comparable to other large tracts. Water and sewer were near the site, but would have required additional piping to reach the site. The estimated return on investment was high, but at the cost of maximizing developable land by impacting a large amount of wetlands. In April of 2009, a Joint Public Notice was advertised by the Savannah District for a proposed mixed-use development on the subject property. The proposed site plan required 51.71 acres of impact to jurisdictional wetlands. Although this particular site plan contained more commercial/industrial buildings than what is proposed on the preferred site, it did contain a residential component, along with the possibility of modifying the site plan to allow for more residential development in place of commercial or industrial uses. Although the site was determined to be a practicable alternative, the amount of impacts necessary to meet the overall project purpose exceeded those of the preferred alternative.

**5.3 Alternate Site 2:** This 9,344 acre site is also located in Camden County, Georgia. The subject property contains +/-8,120 acres of upland and +/-1,224 acres of jurisdictional wetland. The site was available, far exceeded the minimum size requirement, and was located adjacent to Interstate 95. The site was located in the identified geographic search area, and was available at a cost per acre comparable to other large tracts. Water and sewer were not available, but the investment in such facilities either by the applicant, the City of Woodbine, or the City of Kingsland was determined to be economically viable over the projected build-out of such a large tract. The estimated return on investment was high, but would be realized over a much longer time period given the overall size of the tract. Given the expansive wetland system that bisects the subject property, it is estimated that 14.5 acres of wetlands would be impacted to provide roads, utilities, stormwater outfalls, and ditch fill for lot development. Although the site was determined to be a practicable alternative, the amount of impacts necessary to meet the overall project purpose exceeded those of the preferred alternative.

**5.4 Alternate Site 3:** This +/-3,343 acre site is located in Glynn County, Georgia. The site contains +/-2,227 acres of uplands and +/-1,104 acres of wetlands. The site was available, met the minimum size requirement, and was located in close proximity to Interstate 95, although not as readily accessible as Alternate Site 1 and Alternate Site 2. The site was located in the identified geographic search area, and was available at a cost comparable to other large tracts. Water and sewer were near the site, but would have required additional piping to reach the property. The estimated return on investment was high. In June of 2009, the Savannah District issued a 404 permit for a proposed mixed-use development on the subject property. The proposed site plan required 11.30 acres of impact to jurisdictional wetlands. Although the site was determined to be a practicable alternative, the amount of impacts necessary to meet the overall project purpose exceeded those of the preferred alternative.

**5.5 Proposed Site (Preferred Alternative):**

The preferred site, Altama, is located at the intersection of Interstate 95 and State Route 99, in Brunswick. It is a 5,621 acre site with +/-529 acres of wetlands located on the interior portion of the site, 12.57 acres of ponds, and +/-1,955 acres of swamp adjacent to the Altamaha River. The site was available, was located in the identified geographic search area, and was available at a cost comparable to other large development tracts. The estimated return on investment was high due to the low amount of wetland impacts and subsequent low cost of land preparation. This site would offer immediate access to existing infrastructure including I-95 and utilities, both of which are located adjacent to the site. Some of the other sites evaluated would have required additional construction to bring utilities to the sites. The preferred site represents the least environmentally damaging practicable alternate that meets the overall

project purpose, and therefore complies with Section 404(b)(1) guidelines.

**5.6 On-Site Alternatives** The preferred site represents the least environmentally damaging practicable alternate that meets the overall project purpose for those sites that were considered practicable alternatives. The proposed site plan site discussed in Section 4.0 requires 3.99 acres of impacts for roads, 2.92 acres of impact to ditches for lot development, 0.47 acre of ditch excavation for lagoon creation, and 2.28 acres of impact for stormwater structures. The proposed preferred plan represents the least amount of impacts necessary to practicably construct the project to meet the overall project purpose.

Prior to arriving at the proposed development plan, the Applicant prepared several versions of overall development plans attempting to meet the overall project purpose (Attachment H). As they plans were reviewed by the Applicant’s design team, modifications were made to consolidate and minimize impacts to the least amount necessary to achieve the project goal. Impacts to the large river swamp adjacent to the Altamaha River have been avoided altogether. Impacts for the minimal necessary amount of road crossings were located at existing crossings, and where feasible at the narrowest portion of the wetland to limit the road footprint impact area. Stormwater management outfalls were minimized in wetlands by utilizing the extensive amount of lagoons for the majority of the system, and releasing pre-treated stormwater into wetlands in fewer locations. Table 2 below depicts the minimization actions undertaken by the applicant to avoid and minimize wetlands on site to the maximum extent practicable in accordance with 404(b)(1) guidelines:

**TABLE 2  
ALTERNATE SITE PLANS IMPACT COMPARISON**

SITE PLAN VERSION	ROAD IMPACTS	DITCH IMPACTS		STORMWATER IMPACTS	LOT FILL IMPACTS	WETLAND EXCAVATION	TOTAL IMPACTS
		FILL	EXCAVATION				
PREFERRED SITE PLAN	3.99	2.92	0.47	2.28	0	0	9.66
ALTERNATE SITE PLAN 1	4.20	2.89	0.47	2.27	3.89	1.53	13.72
ALTERNATE SITE PLAN 2	4.54	3.36	0.47	2.27	10.08	1.53	22.25

Based upon this site plan criteria, the applicant has demonstrated that impacts to on-site wetlands have been avoided and minimized to the maximum extent practicable while still meeting the overall project purpose.

**6.0 THREATENED AND ENDANGERED SPECIES:**

Altama Plantation is located on the southern bank of the Altamaha River, west of I-95, in Glynn County, Georgia and is comprised of several different upland and wetland habitat types as described in Section 3.0 A comprehensive survey for listed species and habitats was conducted from September 2007 through March 2008 to investigate for the presence of species or suitable habitats for species listed in Glynn County, Georgia by the United States Fish & Wildlife Service. Additional surveys were conducted in 2010, 2013, and 2014

The majority of the subject property has been managed for pine timber production and therefore has been subject to normal mechanical site preparation techniques. There has been little ongoing fire maintenance. As a result, the majority of the upland portion of the subject property consists of new growth pine timber (<20 years) with a dense understory of saw palmetto (*Serenoa repens*) and gallberry (*Ilex glabra*). This upland habitat type is generally not conducive to the species listed for Glynn County, Georgia.

The majority of the freshwater forested wetlands consist of a mature closed canopy of bald cypress (*Taxodium distichum*), slash pine (*Pinus elliotii*), and red bay (*Persea borbonia*) and a dense understory of fetterbush (*Lyonia*



*lucida*). This habitat type is generally not preferred by species listed in Glynn County, Georgia. A few of the isolated grass ponds and forested wetlands were considered marginally suitable for breeding habitat for the flatwoods salamander (*Ambystoma cingulatum*). However, the surrounding terrestrial habitat, consisting of mechanically prepared pine plantation with a dense understory and lack of fire maintenance, is not conducive for their presence. A site specific investigation by consulting herpetologists John Palis & Dirk Stevenson was conducted in 2008 (Attachment D).

The freshwater tidal wetlands and brackish marshes of the Altamaha River swamp are conducive to habitation by the Bald Eagle (*Haliaeetus leucocephalus*) and wood stork (*Mycteria Americana*). A bald eagle's nest is located on the subject property. Although no longer listed as endangered, the eagle is still protected by other federal regulations. Appropriate buffers are in place at the nest site in accordance with the *National Bald Eagle Management Guidelines*, March 2007. There were no wood storks sited, nor is there any knowledge of any rookery sites on the subject property.

The upland sandhill habitat could potentially harbor the federally listed eastern indigo snake (*Drymarchon couperi*). There are several gopher tortoise burrows scattered throughout the subject property, with two (2) dense colonies (approximately 40 to 60 burrows) located in young long-leaf pine (*Pinus palustris*) plantations on the subject property. These areas, as well as the less dense burrow concentrations, were intensively surveyed for the presence of the indigo snake during the appropriate winter months beginning in 2008 (Palis & Stevenson) and in 2010 and 2011 by RLC personnel. In winter 2013, Palis conducted a follow up investigation (Attachment D), and RLC most recently conducted an investigation in late 2013. No specimens or evidence thereof were encountered, and it is likely that they do not exist on the subject property. The subject property as a whole offers only a small amount of marginal habitat.

The subject property borders on the Altamaha River, which could harbor the federally endangered shortnose sturgeon (*Acipenser brevirostrum*). There are no activities proposed in the river or wetlands adjacent to the river that would adversely affect this species.

The other species listed for Glynn County are not likely to occur on the subject property due to lack of suitable habitat. Overall, the project as proposed should not adversely affect any federally listed threatened or endangered species in Glynn County.

#### **7.0 CULTURAL RESOURCES:**

A Phase I cultural resources survey was conducted by Webb & Associates in 2011. The report, titled Phase I Cultural Resources Survey Altama Plantation Development Tract, Glynn County, Georgia, dated September 23, 2011, is included as Attachment E. All features found that were determined to be eligible for listing in the National Register have been avoided.

#### **8.0 STORM WATER MANAGEMENT:**

A storm water management concept plan has been created by Thomas & Hutton in accordance with state and local storm water management regulations.

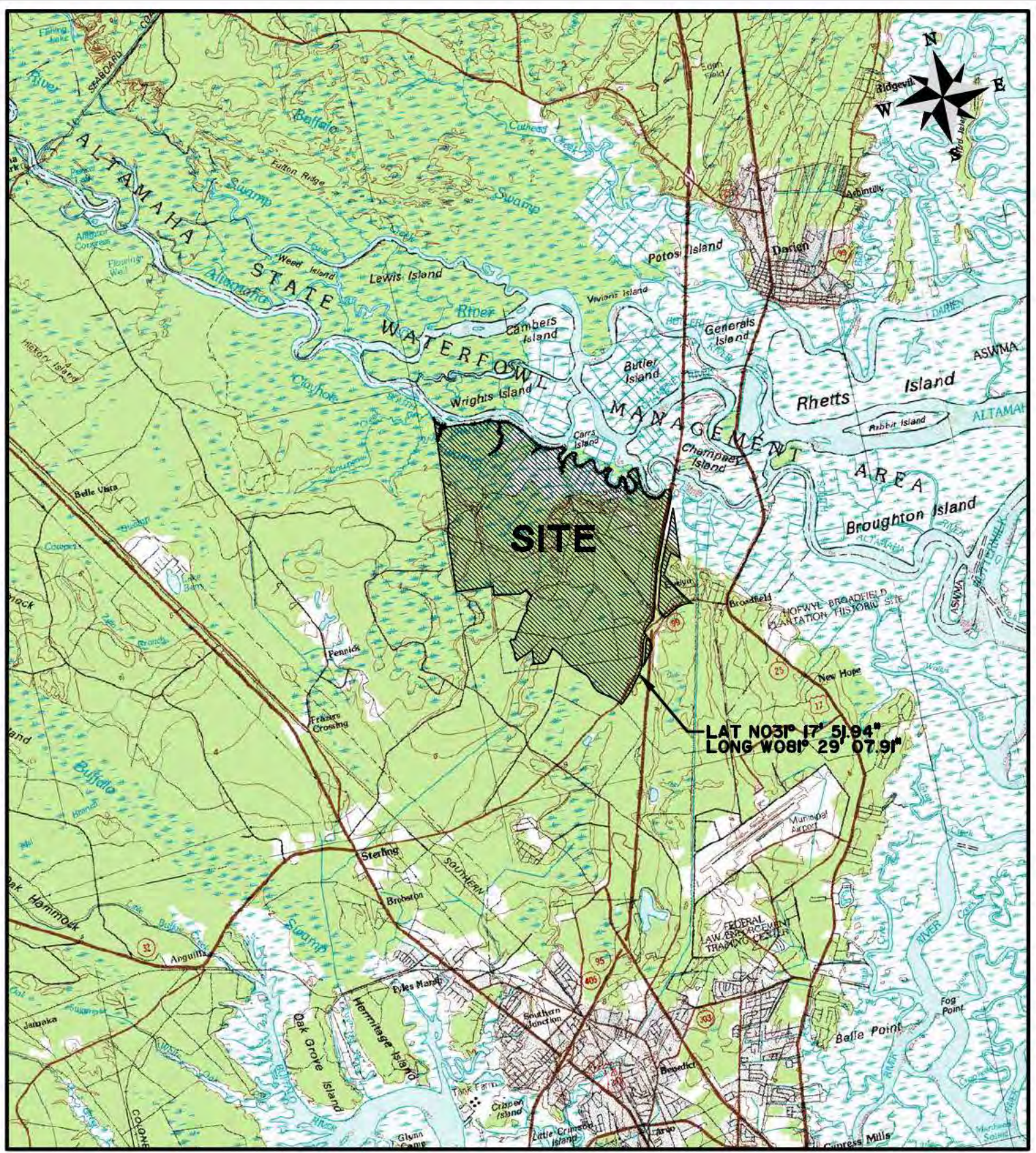
#### **9.0 COMPENSATORY MITIGATION:**

The Savannah District SOP was utilized to determine that 114.9 mitigation credits are necessary to offset the unavoidable wetland impacts associated with the project. The applicant is proposing the purchase the required mitigation credits from Wilkinson-Oconee Mitigation Bank, which is located in the primary service area for the project site. However, the applicant would reserve the right to assess all eligible banks in the primary service area at the time of purchase. Additionally, since large master-planned developments typically take considerable time to develop, the applicant requests the ability to purchase credits on an as-needed basis as development proceeds in distinct phases as determined by the applicant and USACE project manager. (See Attachment F, SOP Worksheets and Impact Site Data)

**10.0 CONCLUSION:**

The Applicant is proposing to construct a mixed-use development on the 5,621 acre preferred site to meet the projected housing demands in the Golden Isles region of coastal Georgia. The project will require impacts to 9.66 acres of jurisdictional wetlands to facilitate construction of roads, utilities, stormwater management structures, and limited lot fill in jurisdictional ditches. As compensatory mitigation for the proposed impacts, the applicant is proposing the purchase of 114.9 wetland credits from Wilkinson-Oconee Mitigation Bank. The proposed project represents the minimum required impacts to accomplish the overall project purpose. The applicant has satisfied 404(b)(1) guidelines as the preferred alternative is the least environmentally damaging practicable alternative. All development activities will be conducted using best management practices to prevent unintended or secondary impacts to wetlands and waters on and adjacent to the subject property.

Z:\24719\24719.0000\Engineering\Drawings\Wetland Management Plan\24719 Bill Sheets.dwg - Nov 20, 2013 - 3:01:03 PM



# ALTAMA

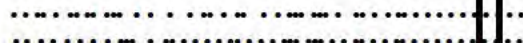
PROPOSED ACTIVITY:  
WETLAND MANAGEMENT PLAN

CLIENT:  
SLF-GA ALTAMA, LLC

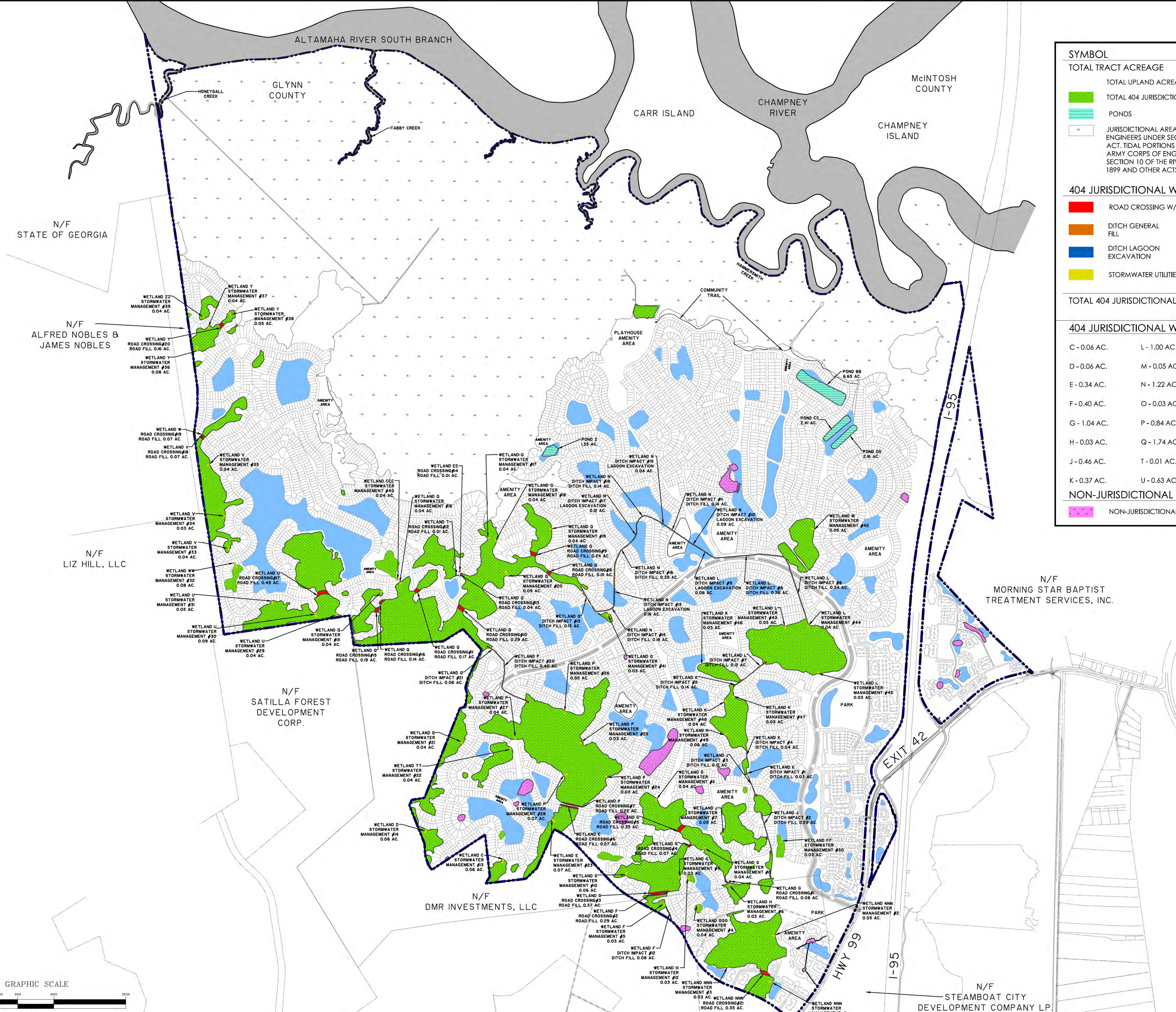
LOCATION: GLYNN COUNTY, GEORGIA  
DATE: 1/30/14  
JOB NUMBER: J - 24719.0000

SHEET: 1 OF 49  
SCALE: 1" = 1000'

**THOMAS & HUTTON**  
Engineering | Surveying | Planning | GIS | Consulting

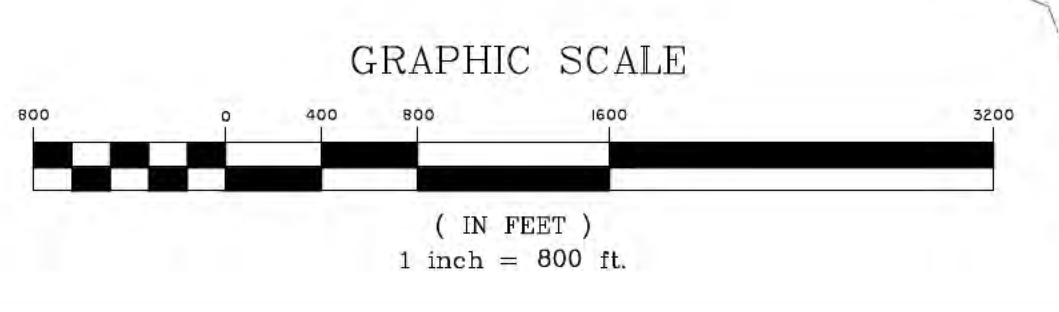


www.thomasandhutton.com  
Brunswick, GA | Columbia, SC | Charleston, SC  
Myrtle Beach, SC | Wilmington, NC



**LEGEND**

SYMBOL	DESCRIPTION	ACREAGE	
TOTAL TRACT ACREAGE		5,621.66 AC.	
TOTAL UPLAND ACREAGE		3,124.96 AC.	
TOTAL 404 JURISDICTIONAL AND ISOLATED WETLAND ACREAGE		529.03 AC.	
PONDS		12.57 AC.	
JURISDICTIONAL AREA OF THE U.S. ARMY CORPS OF ENGINEERS UNDER SECTION 404 OF THE CLEAN WATER ACT. TIDAL PORTIONS OF THIS AREA MAY ALSO BE U.S. ARMY CORPS OF ENGINEERS JURISDICTIONAL UNDER SECTION 10 OF THE RIVERS AND HARBORS ACT OF 1899 AND OTHER ACTS OF THE STATE OF GEORGIA.		1,955.10 AC.	
<b>404 JURISDICTIONAL WETLAND IMPACTS</b>			
ROAD CROSSING W/UTILITIES		3.99 AC.	
DITCH GENERAL FILL		2.92 AC.	
DITCH LAGOON EXCAVATION		0.47 AC.	
STORMWATER UTILITIES		2.28 AC.	
<b>TOTAL 404 JURISDICTIONAL WETLAND IMPACTS</b>		<b>9.66 AC.</b>	
<b>404 JURISDICTIONAL WETLANDS IMPACTED</b>			
C - 0.06 AC.	L - 1.00 AC.	V - 0.18 AC.	CCC - 0.04 AC.
D - 0.06 AC.	M - 0.05 AC.	W - 0.07 AC.	III - 0.03 AC.
E - 0.34 AC.	N - 1.22 AC.	Y - 0.33 AC.	NNN - 0.49 AC.
F - 0.40 AC.	O - 0.03 AC.	EE - 0.01 AC.	OOO - 0.04 AC.
G - 1.04 AC.	P - 0.84 AC.	FF - 0.03 AC.	
H - 0.03 AC.	Q - 1.74 AC.	TT - 0.04 AC.	
J - 0.46 AC.	T - 0.01 AC.	WW - 0.08 AC.	
K - 0.37 AC.	U - 0.63 AC.	ZZ - 0.04 AC.	
<b>NON-JURISDICTIONAL WETLANDS</b>			
NON-JURISDICTIONAL WETLANDS TO BE IMPACTED		20.49 AC.	



**U.S.A.C.E JURISDICTIONAL AND NON-JURISDICTIONAL WETLANDS MANAGEMENT PLAN OF ALTAMA**  
 GLYNN COUNTY, GEORGIA  
 PREPARED FOR:  
 SLF IV - GA ALTAMA, LLC  
 PREPARED BY:  
**THOMAS & HUTTON**  
 Engineering | Surveying | Planning | GIS | Consulting  
 50 Park of Commerce Way • PO Box 2727  
 Savannah, GA 31402-2727 • 912.234.5300  
 www.thomasandhutton.com  
 Brunswick, GA | Charleston, SC | Myrtle Beach, SC | Wilmington, NC  
 JOB NO.: 2-247192000      DATE: JANUARY 30, 2014  
 DRAWN: MGS      SCALE: 1" = 800'  
 REVIEWED: JLM      SHEET: WMP